Appendix A: Table of Historic England's comments on the Proposed Submission Draft Greater Cambridge Local Plan August 2026

Page	Section	Sound/ Unsound/ Comment	Comments
82	S/C/LCR: Land at Clifton Road (including Cambridge Junction and Cambridge Leisure)	Unsound	Whilst there are no designated heritage assets within the site, the site lies close to the New Town and Glisson Road Conservation Area. Any development of the site has the potential to impact upon the significance of the Conservation Area through development within its setting. We welcome the preparation of the HIA. We welcome criteria 18 and 19. We welcome the inclusion of the Spatial Framework. We have concerns about the references to taller than six residential storeys in criterion 20. For Clifton Road the HIA specifically recommends that height is limited 1- 2 storeys to roughly 6 storeys whereas the policy wording seems to encourage / permit development above 6 storeys. Reference to height should either be in line with the recommendations of the HIA or omitted from the policy wording. As currently worded, the policy is not justified by the evidence and has potential to cause harm to the historic environment. It is therefore not consistent with the heritage policies of the NPPF. In order to make the Plan sound, we recommend the following amendment to criterion 20 to read: Proposals <u>should generally be limited to two</u> ~~greater~~ than three commercial storeys within Clifton Road Industrial Estate or ~~taller than~~ six residential storeys within the Cambridge Leisure part of the site.~~,~~ <u>Any taller buildings</u> must create a positive contribution to the wider Cambridge skyline, justified through accurate 3D modelling and comprehensive landscape<u>, heritage</u> and visual impact assessment
92	S/C/SMS Garages between 20 St Matthews Street and Blue Moon Public House, Cambridge	Sound	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. We welcome the changes made to the policy wording. No further comments.
94	S/C/HTR 137 – 143 Histon Road	Sound	Whilst there are no designated heritage assets within the site boundary, the Castle and Victoria Conservation Area lies adjacent to the site. We welcome the changes made to the policy wording.

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			No further comments.
96	S/C/HGH Henry Giles House	Unsound	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. We welcome the changes made to the policy wording. For clarity, given that an HIA has already been prepared for this site we recommend that the word 'detailed' is inserted before Heritage Impact Assessment to avoid any confusion.
98	S/C/HRC: Horizon Resource Centre, 285 Coldham's Lane	Sound	There are no designated heritage assets within the site or nearby. No comments.
100	S/C/PDC: Cambridge Professional Development Centre, Foster Road	Sound	Whilst there are no designated heritage assets within the site, the site lies very close to the Trumpington Conservation Area. Any development of the site has the potential to impact the significance of the conservation Area through development within its setting. No further comments.
103	S/C/PPS: Police Station, Parkside	Unsound	The site is located within the Kite Conservation Area and close to other Conservation Areas (Central and Mill Road) as well as numerous listed buildings and Emmanuel College Registered Park and Garden. The site overlooks Parkers Piece. We welcome the changes made to the policy wording. For clarity, given that an HIA has already been prepared for this site we recommend that the word 'detailed' is inserted before Heritage Impact Assessment to avoid any confusion.
105	S/C/NCA: North Cambridge Academy, 108, Arbury Road	Sound	There are no designated heritage assets within the site or nearby. We welcome the preparation of the HIA. We welcome the changes made to the policy wording. No further comments.
107	S/C/ER: 1-99 Ekin Road and 1-8 Ekin Walk	Sound	There are no designated heritage assets within the site or nearby. We welcome the preparation of the HIA. We welcome the changes made to the policy wording. No further comments.

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109	S/C/DR: 2-28 Davy Road and Garage Blocks	Sound	There are no designated heritage assets within the site or nearby. We welcome the preparation of the HIA. No further comments.
111	S/C/HPC: 1-78 Hanover Court, 1-49 Princess Court and Garage at Newtown Garages	Sound	The site is located within the New Town and Glisson Conservation Area and close to a number of listed buildings including the Grade I The Church of Our Lady of the Assumption and the English Martyrs, Grade II* Wanstead House, and numerous GII listings. We welcome the preparation of the HIA. No further comments.
113	S/C/GER: Former Garage Block, East Road	Sound	Whilst there are no designated heritage assets within the site, the site lies close to the Mill Road Conservation Area and St Matthews Church (Grade II listed). We welcome the preparation of the HIA. We welcome the changes made to the policy wording. No further comments.
115	1– 33 Stanton House, Christchurch Street, Cambridge	Sound	Whilst there are no designated heritage assets within the site, the site lies adjacent to the Kite Conservation Area and Christ Church (Grade II) We welcome the preparation of the HIA. We welcome the changes made to the policy wording. No further comments.
117	Milton Road Garages	Sound	There are no designated heritage assets within the site or nearby. We welcome criterion 1a and reference to local context, contextually appropriate materials and skyline.
119	S/C/SCL: Land South of Coldham's Lane, Cambridge	Unsound	There are no designated heritage assets within the site or nearby. We welcome the preparation of the HIA. We welcome reference to St Andrews church. Part of the HIA refers to viewpoint 7 and part refers to viewpoint 10. The policy itself criterion 1b refers to Viewpoint F. Please check and clarify which viewpoint it is. The

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			strategic views from Lime Kiln Road (E) and also from Worts Causeway (J) are also likely to be affected. Therefore, these should also be referenced in the policy.
122	S/C/BRN: Land at Barnwell Road and Newmarket Road	Sound	There are no designated heritage assets within the site or nearby. We welcome the preparation of the HIA. We welcome the changes made to the policy wording. No further comments.
125	S/C/TRP: Travis Perkins, Devonshire Road	Sound	Whilst there are no designated heritage assets within the site, the site lies adjacent to the Mill Road Conservation Area. We welcome the preparation of the HIA. No further comments.
127	S/C/OPK: Parcel Com4, Orchard Park	Sound	There are no designated heritage assets within the site or nearby. No comments.
129	S/C/BFS: Brookfields	Sound	Part of this site lies within the Mill Road Conservation Area. Any development of the site has the potential to impact upon the significance of the Conservation Area. We welcome criterion 1a, 1b and 1c.
131	S/C/SRW: Station Road West	Sound	Whilst there are no designated heritage assets within the site, the site lies adjacent to the New Town and Glisson Road Conservation Area. The site is also close to the Grade II listed Railway Station. We welcome the preparation of the HIA. We welcome the changes made to the policy wording. No further comments.
133	S/C/BJH: Betjeman House, Hills Road	Sound	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. We welcome the preparation of the HIA.

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			We appreciate the site is under construction but welcome the reference to the scenario should the permission not be completed. We welcome the reference to the retention of the Flying Pig House.
135	S/C/OPM: Old Press/Mill Lane	Unsound	We note that the site boundary has been amended since the Regulation 18 version of the Plan. Therefore, unfortunately the revised policy wording for criterion 1a is now incorrect. Please amend as follows: 'Development must protect and enhance the setting, significance and character of the Historic Core, Central Conservation Area and any designated assets within, or in close proximity to, the site and their settings. Grade II Listed Buildings within the site include the Cambridge University Press (Pitt Press) and the Telephone Kiosks Outside Pitt Building~~,~~. ~~Cambridge University Centre, The Mill Public House, Mill Bridge and various houses~~. Listed buildings nearby include Queens College, Pembroke College and Chapel and St Botolphs Church (all GI), Little St Marys Church (GII*) and numerous GII listed buildings. Queens College GII Registered Park and Garden lies close to the site. A Heritage Impact Assessment must be prepared to inform any masterplanning and proposals for the site and to inform any heritage mitigation and enhancement measures.' Paragraph 3.1.62 therefore needs to be amended to correctly recognise the designated heritage assets. 'There are ~~over 10~~ two Grade II Listed Buildings within the site boundary ~~including (but not limited to)~~ the Cambridge University Press (Pitt Press) and the Telephone Kiosks Outside Pitt Building~~.~~ ~~Cambridge University Centre, The Mill Public House, Mill Bridge and various houses~~. There are also a number of listed buildings in close proximity to the site including several Grade I and Grade II* buildings. There are Buildings of Local Interest (BLI) located within the site. As a result of development proposals, the setting of Listed Buildings in close proximity to the site, the Cambridge Historic Core and, and the Central Conservation Area and its setting, should be protected and enhanced (where the opportunity to do so arises through the improvement of the surrounding public realm). Buildings of Local Interest (BLI) within the site (the Anchor Pub and Laundress Lane Warehouse), together with other buildings identified as making a positive contribution to the Central Conservation Area.'

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			The final sentence doesn't quite make sense and needs to be reworded. It would also benefit from being moved to before the previous sentence. Finally, in order to mirror the New Museums site policy, we recommend adding the following wording to the end of criterion 1a 'This must also be submitted with any application.'
138	S/C/NMD: New Museums, Downing Street	Sound	There are a number of designated heritage assets within the site boundary including part of the Central Conservation Area and a number of listed buildings including the Cavendish Laboratory of Experimental Physics, Mond Laboratory, The Arts School, The Laboratory of Physical Chemistry, and the Zoological Laboratory all listed at Grade II. The site is also surrounded by numerous listed buildings including Corpus Christ (Grade I), Pembroke (Grade II* and Grade II) and St Benet's Church (grade I). We welcome the changes made to the policy wording. No further comments.
142	Policy S/PA/CC: Cambridge City Centre	Sound	We welcome criterion 1c and 1d. No further comments.
145	Policy S/AMC: Areas of Major Change	Sound	We welcome criterion 4.
147	Policy S/AMC/NEC	Unsound	We broadly welcome the allocation of this 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. We appreciate that the site has been reduced to exclude parts of the WWTW. Whilst there are no designated heritage assets within the site, there are several Conservation Areas nearby including Riverside and Stourbridge Common, Fen Ditton, Baits Bite Lock and Horningsea as well as their associated listed buildings. The River Cam, the meadows and its setting are an important part of the wider setting of the City. The site also sits at an important gateway to the City and forms an important edge to the City.

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			Development within this area therefore has the potential to harm the significance of these assets through development within their settings as well as affecting the wider setting of the City. We recognise that an the HIA for North-East Cambridge has been prepared. However, this does not appear to have been included as part of the evidence base for this Plan. It is important to include this as part of the evidence base. Furthermore, to make the Plan sound, it is important to incorporate the recommendations of the HIA into the Policy. This includes recommendations such as increased landscaping along the eastern boundary. The HIA should also be referenced in the policy. There is currently no reference to nearby conservation areas and the River. In order to make the Plan sound, this should be included in the policy. Again, to make the Plan sound, there should also be a new criterion requiring careful consideration of impacts on the Conservation Areas and River as well as views into the City and an appropriate urban edge. We continue to have concerns about potential increases in heights in North-East Cambridge in both the existing Science Park and also the land to the east of Milton Road. There are various references to increased heights in the policy eg criterion 3b, 12b, but there is no reference to strategic views/setting of city and potential impacts heights on heritage assets etc. We remain concerned 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. Heights must be carefully managed through appropriate criteria in the policy. In order to make the Plan sound, this should be included in the policy.
158	S/AMC/AS: Abbey Stadium	Unsound	The site is located adjacent to the Riverside and Stourbridge Common Conservation Area, as well as a number of Grade II listed buildings and close to the Grade I Leper Chapel. We welcome the changes made to the policy wording. In order to make to make the Plan sound, for consistency with the NPPF, in criterion 1j, please replace the word Historic with Heritage.
161	S/AMC/BC: Beehive Centre	Sound	Whilst there are no designated heritage assets within the site, the site lies immediately adjacent to the Mill Road Conservation Area. We welcome the changes made to the policy wording.

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			No further comments.
164	S/AMC/EB: East Barnwell	Sound	There are no designated heritage assets within the area or nearby. No comments.
166	S/AMC/FBG: Fitzroy/Burleigh Street/Grafton Area	Sound	The site contains several designated heritage assets including the Arts Theatre Workshop and Store listed at Grade II* and 17 Fitzroy Street and 38 Newmarket Road both listed at garde II listed. Part of the Kite Conservation Area is included in the Policy Area. There are also numerous listed buildings nearby. We welcome the changes made to the policy wording. No further comments.
172	S/AMC/SCL: South of Coldham's Lane	Sound	Mill Road Conservation Area slightly overlaps this policy area along Burnside. We welcome the changes made to the policy wording especially criterion 4b and 4c. No further comments.
179	Policy S/PRIA: Public Realm Improvement Areas (PRIA) in Cambridge	Sound	We welcome the general aims of this policy. We welcome the changes made to the policy wording. No further comments.
180	S/PRIA/CRP Cambridge Retail Park	Sound	Whilst there are no designated heritage assets within the site, there are two listed buildings on the other side of Newmarket Road – 247 Newmarket Road and Cambridge Gas Company War Memorial, both listed at grade II. We welcome the changes made to the policy wording. No further comments.
183	S/PRIA/EG: Eastern Gate	Unsound	Part of this site lies within the Riverside and Stourbridge Common Conservation Area. There are also several Grade II listed buildings including the Church of St Andrew the Less, 247 Newmarket Road and Cambridge Gas Company War Memorial. There are numerous listed buildings nearby. We welcome criterion 2c and paragraph 3.1.162. The Policy currently makes little reference to the historic environment. Amend policy wording to include more reference to the historic environment. This should include nearby heritage assets and any requirements for heritage (either mitigation or enhancements) in the policy.

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187	S/PRIA/HRRS: Hills Road and Regent Street Corridor	Sound	The Policy Area lies within New Town and Glisson Road Conservation Area and the Central Conservation Area. There are numerous listed buildings along Regent Street and Hills Road, including the grade I listed Downing College and Church of Our Lady of the Assumption and the English Martyrs, the Grade II* Wanstead House and Grade II listed St Pauls Church, and numerous Grade II listings. The Botanic Gardens is a grade II* Registered Park and Garden. We welcome the changes made to the policy wording. No further comments.
190	S/PRIA/MC: Mitcham's Corner	Sound	The Policy Area lies within Castle and Victora Road, De Freville and the Central Conservation Area. We welcome the changes made to the policy wording. No further comments.
189	S/PRIA/MR: Mill Road	Unsound	Parts of the Policy Area lies within the Mill Road, Newtown and Glisson Road and Kite Conservation Areas. It includes part of the Mill Road Cemetery – a Grade II Registered Park and Garden - as well as the Cambridge City Branch Library and Gas Lamp both listed at Grade II. The Policy currently makes little reference to the historic environment. Although we appreciate that the policy mentions Mill Road Conservation Area, the other Conservation Areas and other assets should also be referenced. Amend policy wording to include more reference to the historic environment. This should include nearby heritage assets and any requirements for heritage (either mitigation or enhancements) in the policy.
191	S/PRIA/OPML: Old Press/Mill Lane	Unsound	There are a number of designated heritage assets within the site boundary including part of the Central Conservation Area and a number of listed buildings including Cambridge University Centre, The Mill Public House, The Mill The Mill Bridge and Paved Surround, Mill Haven - West House and Mill Haven - East House, Cambridge University Press (Pitt Press), Telephone Kiosks, 1 Mill Lane, House Adjoining Number 74 on The North, 74 Trumpington Street, 8-11 Little St Marys Lane, Number 1 Little St Marys Lane including gas lamp and Emmanuel Church all listed at Grade II. The site is adjacent to other listed buildings including Little St Mary's Church (Grade II*), Pembroke College and Pembroke College Chapel both listed at Grade I, St Botolph's Church also listed at Grade I as well as numerous Grade II listed buildings. This is a highly sensitive location in terms of heritage.

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			Development within this area therefore has the potential to affect the significance of these assets including through development within their settings. We welcome criterion 1 a and 1 c, but these should be expanded to properly reference the historic environment.
201	Policy S/CE: Cambridge East	Unsound	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 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. Development within this area therefore has the potential to affect the significance of these assets including through development within their settings. We welcome the preparation of the HIA. Section 5.5 helpfully summarises the key heritage sensitivity and Section 6 makes a number of recommendations. We broadly welcome criterion 9 and 10. However, they do not sufficiently reflect the recommendations of the HIA. The HIA recommendations include some strategic landscaping and areas of open space at the north-eastern edge of the site as well as a heritage setting for the airport buildings. These must be included within the policy wording and the Spatial framework (figure 61). We recommend that you amend the policy and figure 61 to incorporate the HIA recommendations in relation to strategic landscaping, open space to northeast of site and heritage setting for airport buildings so that the Plan is informed and justified by the evidence. Figure 53 Amend Scheduled Ancient Monument to Scheduled Monument (NPPF Preferred terminology). Amend throughout the Plan for consistency with the NPPF terminology.
217	Policy S/CBC: Cambridge Biomedical Campus (including Addenbrooke's Hospital)	Unsound	There are no designated heritage assets however there is a scheduled monument 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. There are also 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. Any development of this site has the potential to affect these heritage assets and their settings. We welcome the preparation of the HIA.

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			We welcome 14c, 16c.and 16d and 28. Strategic (Landscape) Enhancement Areas have been part of the previous Local Plan and yet there has been little change to the wider setting of the city in this broad area. It is imperative that future development of the Addenbrookes site is linked to positive offsite mitigation to help enhance the setting of the City and indeed views from heritage assets along the southern hills. This aspect of the Plan, and the link between development and mitigation must be strengthened to ensure that it is implemented. Whilst there have been some changes to the policy wording in relation to the SEA, it is still not clear how development within the CBC site will contribute towards this SEA. Whilst we welcome criterion 19e, we recommend that this should be in the Strategic Enhancement Area section (criterion 18) We note that the Nine Wells Monument listed structure and the scheduled monument are both outside the SEA. We recommend that they should both be brought into the strategic enhancement area to enable positive enhancement of the heritage assets as part of the wider enhancements around the CBC site.
234	Policy S/NWC: Eddington, Cambridge	Unsound	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. There are a number of designated heritage assets in the village of Madingley, including Madingley Conservation Area, Madingley Hall (Grade I),and its Grade II Registered Park and Garden, the Grade II* church of Mary Magdalene, as well as numerous Grade II listed buildings. We welcome the preparation of the HIA. We welcome paragraph 3.2.51 which provides helpful guidance in relation to height. We have concerns about the references to taller than five residential storeys in criterion 5a. The Council's HIA recommends development up to 5 storeys to be appropriate with some parts of the site needing a reduced scale of development. 'Development up to or less than 5 storeys, as currently approved is considered appropriate within the north-western part of the site. Development of the south-eastern part of the

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			site may infill a key area of separation between the approved schemes in the north-western part of the site and designated assets present within the study area. Minimising size and scale of development in this south-eastern area may be necessary, along with the inclusion of landscape buffers and screening. The site is also not considered appropriate for tall landmark buildings. Reference to height should either be in line with the recommendations of the HIA or omitted from the policy wording. As currently worded, the policy is not justified by the evidence and has potential to cause harm to the historic environment and so is not consistent with the NPPF. In order to make the Plan sound, we recommend the following amendment to criterion 5a to read: a. Create a varied and well-articulated skyline. Heights should generally be limited to no more than 5 residential storeys with evidence being submitted to demonstrate that any taller buildings of more than five residential storeys create a positive contribution to the wider Cambridge skyline, justified through comprehensive landscape, heritage and visual impact assessment' Development heights and scale should be minimised in the south-eastern area along with appropriate landscape buffers and screening around the edges of the site. Site not appropriate for tall landmark buildings.'
245	Policy S/WC: West Cambridge	Unsound	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). We welcome the preparation of the HIA. We welcome the changes made to the policy wording. 3.2.53 Amend reference to Schlumberger to Grade II* listed (not Grade II). Also, at end of that sentence add '...Conservation Area...and their associated listed buildings'.
252	Policy S/HHR: Land between Huntingdon Road and Histon Road	Sound	The site adjoins the Howes Place Conservation Area (designated 2024). We welcome the changes made to the policy wording. No further comments.

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260	S/EOC/NWO: Land north of Worts' Causeway	Sound	There are no designated heritage assets within the site. The Grade II listed Milestone lies just to the east of the site. We welcome the changes made to the policy wording. No further comments.
263	S/EOC/SWO: Land south of Worts' Causeway	Unsound	There are no designated heritage assets within the site. The Grade II listed Milestone lies just to the east of the site. We welcome the changes made to the policy wording. For accuracy, The Policy name is Policy S/EOC/NWO: Land north of Worts' Causeway when presumably it should be Policy S/EOC/SWO: Land south of Worts' Causeway
266	S/EOC/BS: Bell School, Babraham Road	Sound	There are no designated heritage assets within the site and none nearby. No comments
268	S/EOC/FRE: Fulbourn Road East	Sound	There are no designated heritage assets within the site. The Fulbourn Hospital Conservation Area lies to the northeast of the site. We welcome the changes made to the policy wording. No further comments.
270	S/EOC/IDH: Ida Darwin Hospital	Sound	There are no designated heritage assets within the site. The Fulbourn Hospital Conservation Area lies to the southwest of the site whilst the Settlement Site by Caudle Corner Farm Scheduled Monument lies immediately to the north of the site. Any development of this site has the potential to affect these heritage assets and their settings. There does not appear to be an HIA for this site. However, we appreciate that planning permission has been granted for this site and construction is progressing. We welcome criterion 1c.

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272	S/AMC/FH: Fulbourn Hospital Area of Major Change	Unsound	The site lies within the Fulbourn Hospital Conservation Area. The Settlement Site by Caudle Corner Farm Scheduled Monument lies to the north east of the site. Any development of this site has the potential to affect these heritage assets and their settings. There does not appear to be an HIA for this site. We broadly welcome criterion 1b and recommend the addition of the words '...and Caudle Corner Farm Scheduled Monument' to the end of the sentence. We broadly welcome criterion 1c but recommend the following modification '... Fulbourn Hospital Conservation Area and Caudle Corner Farm Scheduled Monument.'
	New Settlements		
279	Policy S/CBN: Cambourne North	Unsound	There are two listed buildings within the site area – New Inn Farmhouse and Barns to the north of New Inn Farmhouse. There are other designated heritage assets near the site including a grade II listed milepost. To the north of the site lie the Elsworth and Knapwell Conservation Areas and their associated listed buildings including the Grade II* All Saints Church. 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 scheduled monument, Overhall Moated site, also lies to the north. We welcome the changes made to the policy wording and to paragraphs 3.3.16, 17 and 25. In 14 ci We recommend that the policy should allow for the conversion/restoration of the farmhouse and barns and finding a suitable use together with a conservation management plan for the assets going forward. This criterion should also state that development should be excluded from a buffer area immediately surrounding these assets as shown in the framework plan. . In 14 d Areas of known archaeological sensitivity should be referenced in the policy using the recommended wording from the HIA Areas of potential high archaeological significance should be given the same consideration and protection as Scheduled Monuments. As such they should not be subject to development, and site layout should accommodate physical conservation of remains. In addition, the following wording is needed in relation to archaeological assessment A desk-based assessment should be undertaken to inform the masterplanning process. It is noted that field investigations are currently underway by East West Rail Co. in the south of the site as part of the DCO process

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			for the new railway line connecting Cambourne and Cambridge. The results of this investigation may inform a future listing review. Figure 78 We welcome the open space shown on the diagram around New Inn Farmhouse and Barns.
301	Policy S/CB: Cambourne	Unsound	Great Common Farmhouse listed at grade II lies within the site boundary, There are 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. There are other listed buildings to the west and the east of Cambourne. There are also a number of scheduled monuments in the area including Moulton Hills Roman Barrows, a ringwork and bailey castle and 17th century formal garden remains at Bourn Hall, Caxton moats – medieval moated site and another at Pastures Farm. Finally, there are two further registered parks and gardens in the area at Bourn Hall (Grade II) and Longstowe Hall (Grade II*). Any development of this site has the potential to affect these heritage assets and their settings. We welcome the changes made to the policy wording at criterion 3. The policy should also reference the two nearby Registered Parks and Gardens, Bourn Hall (Grade II) and Longstowe Hall (Grade II*)
316	Policy S/GF: Land adjacent to A11 and A1307 at Grange Farm	Unsound	A Bronze Age Barrow Cemetery lies within the site, 440m north west of Grange Farm Cottage. There are a number of designated heritage assets nearby including 8 Cambridge Road and Worsted Lodge Farmhouse, both listed at grade II, Great and Little Abington Conservation Area and the associated listed buildings including the Grade II * St Marys Church and numerous grade II listed buildings. To the north of the site lies Worstead Street (Via Devana), a Roman Road. The Roam Road lies along the northern edge of the Strategic Enhancement Area. To the west north-west of the site lies an icehouse. Any development of this site has the potential to affect these heritage assets and their settings.

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			We welcome the preparation of the HIA for the site. The HIA notes that there will be a high risk of residual harm to heritage given the scale and nature of the proposals. Therefore, it is essential that every opportunity is taken to mitigate impacts and also maximise enhancements for heritage. We welcome many of changes made to the policy wording Criterion 12f appears to include two separate criteria. We recommend these are separated for clarity. Criterion 21 a i. The policy reads 'Prevent Direct Access onto the SSSI'. This would appear rather strong. We appreciate the desire to manage recreational impact on the Roamn Road and therefore the desire to create alternative walking roues through the strategic enhancement area, but it would seem somewhat restrictive/limited to prevent any direct access onto the Roman Road which is a public right of way and part of a longer distance recreational route. Access can be beneficial, but it needs to be restricted/managed to the right level of use to ensure the monument remains sustainable. We recommend that the wording is amended to 'Carefully manage access onto the SSSI/ Scheduled Monument/PROW Roman and provide alternative walking/recreational opportunities within the Strategic Enhancement Area to minimise recreational pressure on sensitive ecological and heritage areas'. Figure 68 Spatial Framework: Delete Ancient – should just read Scheduled Monument. Figure 68 shows a dotted pink line for a potential northern access. We recommend that this is deleted for the reasons set out below. 3.3.53: This paragraph states that the SEA could accommodate infrastructure for the site. We are concerned that this could lead to inappropriate development within that buffer zone which is intended to protect the scheduled monument and its wider setting. We recommend that this sentence should be deleted. 3.3.55: the reference to the Barrows in this paragraph should be updated to identify them as a scheduled monument, following their recent designation. 3.3.57-58: The introduction of the potential idea of a northern access through the heritage buffer in this paragraph would not be acceptable to Historic England due to the likely level of harm caused to the wider setting of the Roman Road by the introduction of an access road which would be inconsistent with both the NPPF and the recommendations of the HIA.

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			The need for an access point in this location is not sufficiently justified by the evidence, and the potential impacts have not been explored through the heritage impact assessment. The proposal is contrary to the Regulation 18 Plan which demonstrated that the access to the site would be from the A1307. For these reasons, we consider that this element of the proposal is not sufficiently justified and not consistent with the NPPF. We therefore recommend that the final clause of the last sentence of paragraph 3.3.57and all of paragraph 3.3.58 should be deleted.
334	Policy S/NST: Northstowe New Town	Sound	Parts of the Longstanton Conservation Area lie within the site. There are also 8 Grade II listed pillboxes within the site. There are a number of other designated heritage assets nearby including Oakington and Westwick Conservation Areas and their associated listed buildings including the Grade I All Saints Church, St Andrews Church and St Michaels Church, both listed at Grade II*, and several Grade II listed buildings. We welcome the changes made to the policy wording
344	Policy S/WNT: Land north of Waterbeach	Sound	Whilst there are no designated heritage assets within the new settlement allocation itself there are a number of highly grade assets to the north of the site in the Strategic Enhancement Policy Area. Denny Abbey (scheduled monument, and 2 Grade I listed buildings and 2 Grade II listed building (barn and gate piers). To the south of the site is Waterbeach Conservation Area and its associated listed buildings. There are some listed milestones along the A10. We welcome the changes made to the policy wording No further comments
354	Policy S/BA: Bourn Airfield New Village	Unsound	There are no designated heritage assets within the site but there are some Grade II barns to the north of the Grange. I the Strategic Enhancement Area to the south of the site allocation. Great Common Farmhouse (also Grade II listed) lies to the west of the site. Bourn Village and Hall Conservation Area lies to the south of the site. We welcome the changes made to the policy wording Figure 72: This should also identify nearby heritage assets (much as the other Spatial Frameworks do)
	Rural Southern Cluster		
367	Policy S/WGC: Wellcome Genome Campus,	Unsound	We note that this policy now just relates to the expansion area. Therefore, the policy wording will need to be changed accordingly to reflect the appropriate heritage assets.

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	Expansion Land Hinxton		The expansion site (largely to the east of the A1301) includes part of the Hinxton Conservation Area. Whilst there are no listed buildings within the expansion area, there are a number nearby including the Grade II* Hinxton Hall, game larder, stables and North Lodge, all listed at Grade II, as well as Hinxton Conservation Area. St Johns Church, the Old Manor House and The Oak House, all listed at Grade II*, as well as numerous Grade II listed buildings lie within the wider Conservation Area. To the north of the site lies Hinxton Grange and Stables, both listed at Grade II. We welcome some of the changes made to the policy wording Criterion 7 should be amended to more accurately reflect what assets are within the site and nearby. We recommend the following wording: '~~b~~ a. Hinxton Conservation Area within and to the west of the site ~~east~~. Design mitigation…..' ~~a~~ b. ~~Grade II* Listed Hinxton Hall within the allocated area, as well as other nearby~~ Listed Buildings nearby including the grade II* Hinxton Hall and St Johns Church and various grade II listed buildings. We welcome paragraphs 3.4.17 and 3.4.18.
376	Policy S/BRC: Babraham Research Campus	Unsound	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. 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. Criterion 6: The Policy states that Babraham Hall is Grade II*. However, our records show this is listed at Grade II. Please amend for factual accuracy.
Other site allocations in the rural southern cluster			
388	Policy S/RSC/MF: Land at Maarnford Farm, Hunts Road, Duxford	Sound	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. No comments
390	Policy S/RSC/BR: Land south of	Sound	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.

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	Babraham Road, Sawston		We welcome the changes made to the policy wording. No further comments.
392	Policy S/RSC/FSS: Former Spicers Site, Sawston Business Park, Sawston	Sound	The site contains part of the scheduled monument. The scheduled monument known as 'Borough Hill' is a large multivallate (multi-ditched) iron age fort. This is an exceptional pre-historic site, of which there are less than a handful of surviving examples around the country. It is also on our heritage at risk register. We have previously raised concerns about the impact of the development on the significance of the designated asset. Our primary concern is the impact of the development upon the significance of the scheduled monument through a development within it setting. The closeness, scale and massing of the new development will significantly increase the quantum of the development in the area immediately adjacent to the monument. The setting of the monument will be irrevocably changed, and the significance of the asset will therefore be eroded and diminished. This development would therefore result in harm to this significance. We recognise that the Spicers site is a brownfield site and that some form of redevelopment of this site would be acceptable in principle. However, development will need to be very sensitive to the monument adhering to the recommendations of the HIA. We welcome the changes made to the policy wording. No further comments.
397	Policy S/RSC/CC: Comfort Café, Fourwentways Little Abington	Sound	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. No comments
Policy areas and Areas of Major Change in the rural southern cluster			
401	Policy S/PA/LN: South of A1307, Linton	Sound	We broadly support this policy area.
402	Policy S/AMC/WHD: Whittlesford Parkway Station Policy Area,	Unsound	The Chapel of Hospital of St John the Baptist is a scheduled monument and listed at Grade II*. The Red lion Hotel is listed at Grade II. We welcome criterion 2v but for accuracy and consistency with the NPPF the fifth word should be scheduled (not schedule). Please amend.

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	Whittlesford Bridge		
405	Policy S/AMC/GP: Granta Park Area of Major Change	Unsound	We welcome the reference to heritage assets in the policy. Criterion 1c The policy should also make reference to South Lodge (Grade II) and the nearby St Marys Church (Grade II*) Add reference to the need for a Heritage Impact Assessment The reference to Heights should be limited to lower than the surrounding treescape. We recommend that you amend criterion 1c to read: The design, including building heights, massing and materials, responds sensitively and positively to the existing built form and parkland setting, with development ~~responding positively to~~ set lower than the treeline, maintains and enhances connections with key landscape features, including the corridor of the River Granta, and avoids unacceptable adverse impacts on the Grade II* Listed Abington Hall, the adjoining Great and Little Abington Conservation Area, South Lodge (Grade II), the nearby St Marys Church (Grade II*) and other nearby designated heritage assets. Any development proposed in this policy area must prepare a Heritage Impact Assessment’;
407	Policy S/AMC/WGC: Wellcome Genome Campus, Hinxton Area of Major Change	Unsound	The Area of Major Change includes the Grade II* Hinxton Hall, game larder, stables and North Lodge all listed at grade II as well as Hinxton Conservation Area. St Johns Church, the Old Manor House and The Oak House all listed at Grade II* as well as numerous Grade II listed lie within the wider Conservation Area. To the north of the site lies Hinxton Grange and Stables, both listed at Grade II. We broadly welcome the proposed policy wording although recommend the following change to criterion i) to more accurately reflect the heritage assets within the Area i. The design, including building heights, massing and materials, responds sensitively and positively to the existing built form and parkland setting, maintains and enhances connections with key landscape features, conserves and enhances the significance of heritage assets including ~~unacceptable impacts on~~ the Grade II* Listed Hinxton Hall, several Grade II listed buildings, and Hinxton Conservation Area within the site as well as~~;~~ ~~and~~ nearby off-site heritage assets.
411	Policy S/AMC/IWM: Imperial War	Unsound	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

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	Museum, Duxford (inc. AvTech 1) Area of Major Change		Register. Often the best use for an asset is its original use. However, this clearly has implications for development in the surrounding area. We welcome the changes made to the policy wording. The potential uses for the land in the west end of the site should be set out in the policy and/or supporting text. Historic England is keen to support the ongoing use of the site as a museum which is an important visitor attraction, educational, commercial and aviation facility.
Rest of the rural area			
417	Policy S/SHF: Land north of A1307, Bar Hill (Slate Hall Farm)	Unsound	Whilst there are no designated heritage assets within the site, the grade II milestone is located nearby. The Grade II * All Saints Church at Lolworth and the Grange (Grade II) lie to the west of the site on slightly elevated ground. Whitehall Farmhouse lies to the north east of the site at the edge of Oakington. The Plan should be clear as to whether Slate Hall Farm is a NDHA or not. Please assess to determine if it meets the criteria of a NDHA and amend the Policy wording accordingly. Criterion 9 and 16 both refer to the NDHA. We welcome the changes made to the policy wording.
Other site allocations in the rest of the rural area			
425	Policy S/RRA/ML: The Moor, Moor Lane, Melbourn	Sound	We welcome the preparation of the HIA. We welcome the changes made to the policy wording. No further comments.
428	Policy S/RRA/H: Land at Highfields (phase 2), Caldecote	Sound	No comments.
429	Policy S/RRA/SCS: Land to the south of Cambridge Services, A14	Unsound	Whilst there are no designated heritage assets within the site boundary, there are a number of assets nearby, St Peters Church Boxworth and All Saints Church, Lolworth, both listed at Grade II* as well as a number of other listed buildings. Any development of this site has the potential to affect these heritage assets and their settings.

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			We welcome the preparation of the HIA. The HIA refers to the importance of managing heights in relation to heritage impacts. Employment uses have the potential for greater impact due to scale and massing. To that end the need for detailed heritage impact assessment should be included in criterion 1 d. References should also be made to nearby heritage assets in the policy. We recommend the following wording: d. To undertake a Landscape and Visual Impact Appraisal and a detailed Heritage Impact Assessment to fully assess landscape impacts and identify mitigation measures where necessary, including the careful arrangement and scale, bulk and massing of built form to ensure no unacceptable adverse impacts to long distance views, landscape character and the historic environment, including the Grade II* Listed Churches of All Saints, Lolworth and St Peters, Boxworth.;
434	Policy S/RRA/BBP: Land at Buckingway Business Park, Swavesey	Sound	Whilst there are no designated heritage assets within the site, there is a Grade II listed barn for the north-east of the site. There is also a cluster of listed buildings at Lolworth, including the Grade II* All Saints Church. We welcome the changes made to the policy wording. No further comments.
436	Policy S/RRA/SNR: Land to the north of St Neots Road, Dry Drayton	Sound	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. However, there is considerable vegetation and distance between the site and the proposed allocation. No further comments.
439	Policy S/RRA/OHD: Old Highways Depot, Twenty Pence Road, Cottenham	Sound	Whist there are no designated heritage assets within the site, the Cottenham Conservation area is next to the south-western corner of the site. The Grade I listed Church of All Saints is very nearby, as are two Grade II listed buildings. We welcome the changes made to the policy wording. No further comments.

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441	Policy S/RRA/NW: Norman Way, Over	Sound	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. 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. We welcome the preparation of the HIA. No further comments.
443	Policy S/RRA/CRH: Land adjacent to Cambridge Road (A10) and Mill Lane, Hauxton	Unsound	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. We welcome the preparation of the HIA. We welcome the changes made to the policy wording. There are opportunities for design to enhance the setting of the heritage assets. The HIA recommends an area of landscaped open space in the northern part of the site. This is shown in diagrammatic form in the HIA. This diagram should be included in the Local Plan.
446	Policy S/RRA/CH: Land at Compass House, Chivers Way, Histon and Impington	Unsound	Whilst there are no designated heritage assets within the site, Histon Conservation Area lies to the north of the site. The Grade II listed 82-92 Station Road also lies to the north of the site. The Mill Cottage Grade II and Impington Mill Grade II* lie to the south of the site. We welcome the changes made to the policy wording. The plan should be clear about the status of the potential NDHA. Please assess to determine if it meets the criteria of a NDHA and amend the Policy wording accordingly.
449	Policy S/RRA/CR: Land to the west of Cambridge Road, Melbourn	Sound	There are no designated heritage assets within and site. The Melbourn Conservation Area and associated listed buildings lies further to the south-west of the site. No further comments
Policy Areas and Areas of Major Change in the rest of rural area			
452	Policy S/AMC/PH: Papworth Hospital, Papworth Everard	Sound	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. We welcome the changes made to the policy wording.

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			No further comments
455	Policy S/AMC/FD: Fen Drayton Former Land Settlement Association Estate	Sound	The Fen Drayton Conservation area and associated listed buildings lies to the east of the site. We welcome the changes made to the policy wording. No further comments
458	Policy S/AMC/HIS: Mixed Use Development in Histon & Impington Station Area	Sound	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 as well as other listed buildings to the south (Impington Windmill Grade II* and Mill House Grade II). We welcome the changes made to the policy wording. No further comments
460	Policy S/AMC/GT: Optimisation of Gypsy and Traveller sites	Sound	The Chesterton Fen Road site is located across the river from the Fen Ditton and Riverside and Stourbridge Common Conservation Areas. We welcome the changes made to the policy wording. No further comments
440	Policy CC/RE: Renewable Energy Projects and Infrastructure	Unsound	Historic England is supportive of renewable energy development and supports the inclusion of a policy for renewable energy. We note that you have commissioned a Landscape Assessment – Part 2 Renewable Energy Development Assessment as part of the evidence base for the Local Plan. We note that this evidence has been used for the development of maps for solar and wind turbines which have then been used on the policies map. The assessment is mainly landscape focussed and does not appear to give detailed consideration to the historic environment (though there are some mentions of heritage e.g. church spires but more in relation to the wider landscape). 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,

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			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 to 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 LSA Layer key is clearer and more robust. We welcome the 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. Add criterion to read: 1e The historic environment (including archaeological remains) and the setting of heritage assets <u>(a detailed Heritage Impact Assessment will be required)</u>; Reference to the need for further site-specific assessment of proposals should be included on the key for the LSA layer. Further to recent discussions with the Council regarding the District Heat Network we recommend the following changes to Policy and supporting text. Add addition criterion to read <u>12) The design and composition of any District Heat Network infrastructure shall be of high-quality follow design principles and process set out in relevant District Heat Network documentation. New infrastructure shall respond positively to its character, context, surrounding heritage, and contribute to placemaking through the creation of public architecture to be celebrated.</u> Add additional supporting paragraph to read: <u>4.56 Future District Heat Networks will comply with appropriate design expectations throughout the city as set and agreed by GCSP. Proposals must be informed by a clear understanding of character, context, heritage, and future design briefs.</u>

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596	Policy GP/HD: Housing Density	Sound	No further comments
598	Policy GP/ST:Skyline and tall buildings	Unsound	Historic England is 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. Within 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 inclusion of a policy for tall buildings and the skyline. We welcome the addition of the reference to site-by-site basis in criterion 1a. In criterion 1b, we recommend replacing the word 'quantify' with 'articulate'. Quantify gives the incorrect impression of a numerical scale. **Appendix H** Paragraph H24 should read Advice note 4 (not 3) Please amend for accuracy. **Skyline and Tall Buildings Strategy** 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. We welcome the executive summary. We recommend the addition of the words on a <u>site-by-site basis</u> at the end of the first paragraph, second column, page II of Executive Summary to read …fully tested and <u>mitigated on a site-by-site basis</u>.
609	Policy GP/HE Historic Environment	Unsound	Historic England welcomes this policy. We welcome the positive strategy for the historic environment as set out here and elsewhere in the Plan. Criterion 1 – These should either be referred to as Heritage Impact Assessments or Heritage Statements. Please amend.

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			We welcome the changes to policy wording in criterion 2a and 2c. Criterion 2 c needs an additional word '…access to a wider range of heritage assets…' Paragraph 7.61 These should either be referred to as Heritage Impact Assessments or Heritage Statements. Please amend.
613	Policy GP/HA: Designated heritage assets	Unsound	Criterion 1 sets an inappropriate tone. The clear overriding message should be that harm should be avoided in the first instance. We recommend that you amend criterion 1 to make it clear that harm should be avoided in the first instance. Add additional text at start of criterion to read: 'Great weight should be given to the conservation of heritage assets. Harm should be voided in the first instance... 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 appreciate that you are laudably seeking ways to support heritage. 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 such a policy. Paragraphs 7.71 – 7.74 We recommend that these paragraphs should also be deleted for the reasons set out above.
618	Policy GP/ND: Non-designated heritage assets	Sound	We welcome the changes made to the policy wording. No further comments
620	Policy GP/CC Adapting heritage assets to climate change	Sound	We welcome the changes made to the policy wording. No further comments
622	Policy GP/AR: Archaeology	Unsound	We welcome the changes made to the policy wording. Paragraphs 7.91 and 7.92 repeat the need for scheduled monument consent. This seems to be unnecessary duplication, and we suggest deletion of the penultimate sentence of para 7.91.
624	Policy GP/SF: Shopfronts	Sound	No further comments

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722	Policy H/GT: Gypsy and Traveller pitches and Travelling Show people plots	Sound	No further comments
765	Policy I/DT: Digital and Telecommunications infrastructure	Sound	No further comments