



Historic England

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Date: 3 May 2016

Dear Inspectors,

**Local Plan Examinations; Cambridge City and South Cambridgeshire
Matters and issues for Cambridge City Local Plan Specific Hearing Sessions
Matter CC1 – Heritage Polices – Protecting and Enhancing the Character of
Cambridge
CC1A – Design and the Historic Environment**

Historic England (formally English Heritage) is primarily concerned with how the draft Cambridge City Local Plan would impact on the historic environment. We have previously submitted representations outlining a number of concerns and objections we identified within the draft Plan. Following detailed discussions with the City Council we are pleased to advise that the City Council has now agreed to a number of modifications to their draft Plan that have gone a long way to addressing our concerns, and these have enabled us to agree a Statement of Common Ground with the City Council. As a result we are withdrawing our objections to the Plan.

With reference to the Matters and Issues identified for examination, Historic England wishes to provide the following comments to assist in the examination process:

1A.3 iii Policies 56 to 58

Historic England has reviewed these policies and, in our opinion, they do not promote or impose particular architectural styles or tastes and are sufficiently flexible so as to allow for design innovation. We consider them to be appropriate for promoting local distinctiveness but also in accord with Paragraph 60 of the Framework.

1A.3 iv Policy 60

Historic England agrees that the definition of tall buildings in the policy should be consistent with the definition in paragraph F.9 of Appendix F of the Plan. Furthermore, we believe that the definition in Appendix F to be preferable to that set



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out in Policy 60 and that the Council has now agreed to this, as set out in our Statement of Common Ground.

1A.3 vi Policy 60 and Appendix F

Historic England has not requested that the view from the Coton footpath and from the M11 be included in paragraph F.20d and Figure F.2 of Appendix F, but we would have no objection to their inclusion.

1A.3 vii Policy 60 and Appendix F

Historic England agrees that it would be helpful for paragraph F.35 to make reference to the setting and significance of heritage assets and therefore we welcome the changes now proposed by the City Council in respect of this paragraph.

1A.3 viii Policy 60 and Appendix F

Overshadowing of the public realm, and in particular the historic public realm, is a concern of Historic England. We therefore welcome the change proposed by the City Council to paragraph F.41 to address this matter.

1A.4

Historic England welcomes the addition of a new paragraph and the supporting diagram (new Figure 7.1) to help demonstrate the Council's strategy for managing the city's historic environment.

1A.4 i Policy 61

Historic England agrees that the historic core should be identified by way of the map that the City Council has now introduced and that the historic core is necessarily different to the city centre (since areas current city centre such as the Grafton Centre are not part of the historic core).

1A.4 ii Policy 61

Following the clarification by the Council of the definition of heritage assets, Historic England does not agree that criteria a), b) d) and e) relate only to designated heritage assets as reflected in paragraphs 132 – 134 of the Framework. For example, we could envisage a number of instances where the loss of a building of local interest would result in harm to the character or appearance of the conservation area, and Section 72 of the Planning (Listed Buildings and Conservation Areas) Act 1990 does not differentiate between designated and non-designated assets when setting out the statutory desirability of preserving or enhancing the character or appearance of a conservation area. However, we would consider it appropriate to add a caveat that the more important the asset the greater the weight that should be given to its conservation (in order to ensure the Plan is in conformity with paragraphs 132 and 135 the Framework). These comments also apply to Policy 9 criteria c) as covered in our Statement of Common Ground with the Council.

1A.4 iii Policy 61

Historic England agrees that, in order to fully accord with statutory test, the wording of criterion a) should be amended to 'preserve or enhance' and that the second bullet



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point of paragraph 7.24 should be changed to 'character or appearance, and notes that the Council has incorporated this change within their proposed modifications.

1A.4 iv Policy 61

At the time that the 2006 Plan was adopted Government guidance on the Historic Environment was set out in PPG 15, and this included the recommendation that Outline applications would not normally be appropriate in conservation areas. That guidance is not repeated in the current Framework. But Paragraph 128 of the Framework sets out that local planning authorities should require applicants to set out in sufficient detail the potential impact of their proposal on the significance of any heritage asset affected. Historic England's preference would always be for applications in conservation areas to be submitted in Full rather than Outline, since then there can be no ambiguity over the impact of the proposal on the historic environment. However, we are aware of a number of instances where it has been possible, through the use of detailed parameter plans, to describe the scale, form and massing of a proposed development in sufficient detail to understand its impact without requiring a fully worked up architectural design. Therefore, so long as the City Council adheres to the guidance set out in Paragraph 128 of the Framework, it would not be necessary to always require a Full application for developments in conservation areas. But where an applicant fails to provide sufficient information to enable the impact on the historic environment to be properly assessed, then Historic England would expect the City Council to refuse the application.

1A.4 v Policy 62 and Appendix G

Historic England agrees that the changes now proposed by the City Council to Policy 62 will help ensure the Policy is in accord with paragraph 135 of the Framework

1A.4 vi Policy 62 and Appendix G

The year 1840 is used by Historic England in our Assessment Criteria for consideration of buildings for addition to the national list. The number of buildings surviving after this date increase significantly such that only the better examples are considered for listing, whereas before this date the numbers surviving are fewer, and almost all will merit consideration for listing.

1A.4 vii Policy 62 and Appendix G

Historic England would welcome a broadening of the scope of the local list to include structures, features and gardens.

Yours sincerely

Natalie Gates

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