

**Matter CC1A – Heritage Policies – Design and the Historic Environment**

**Policy 7 –  
The River Cam**

**Policy 60 and Appendix F -  
Tall Buildings and the Skyline in Cambridge**

**Policy 61 –  
Conservation and enhancement of the City’s historic environment**

**Cambridge City Council Respondent Personal Identification: 5295**

**Name of Representor: John Preston**

**CCC Representation Numbers: 27531  
27608  
27565**

**also referencing M2/5295  
27303**

**Date: 14<sup>th</sup> June, 2016**

**Cambridge City Council and South Cambridgeshire District Council  
Examination of Submitted Local Plans 2013**

# Statement by JOHN PRESTON MA(CANTAB) DipTP IHBC

## 1. Introduction

1.1 This statement covers Policy 7, Policy 60, and Policy 61. It also references strategic issues covered in my Statement M2/5295 and representation 27303, which were deferred from the M2 Hearings.

1.2 My primary focus is on the Plan's failure to demonstrate a positive historic environment strategy as required by NPPF Para 126, and as queried by the Inspector in relation to Policy 61.

1.3 My comments on Policies 7 and 60, although taken first in Matter order, are essentially secondary to the lack of a Historic Environment Strategy, as raised specifically in relation to these Policies in my representations 27531 and 27608.

**1.4 The Plan's failings in relation to para 126 of the NPPF are so serious that they are grounds for declaring the whole Submission Draft Plan unsound.** I do not want this to happen; what I want to see is the present Submission Draft amended to become a sound Plan which takes proper account of Cambridge's national and international historic environment significance.

**1.5 What is urgently needed is for the Plan process to be put on further hold while the City Council prepares the strategy required by para 126.** I raised this issue very clearly in Matter 2, when consideration of the historic environment was deferred. Had this not been the case, the City Council could have been asked to do this essential additional work during the recent recess.

## 2. Policy 7 – The River Cam

***1A1 i. In addition to criterion (b), should the policy specifically require new development to preserve or enhance the setting of the river within the historic core having regard to paragraph 2.71 of the policy and the findings of the Cambridge Historic Core Appraisal (2006)?***

2.1 Yes, but not only within the historic core. Most of the river frontage within the City boundary adjoins Conservation Areas, to which the statutory duty to preserve or enhance applies. The river only features incidentally within Conservation Area Appraisals. There should be a coherent assessment of the character, significance and issues of the whole river corridor, to update "River Cam: Environment and Conservation" (City Council 1971). This would be a vital part of the historic environment strategy required by NPPF para 126.

2.2 Policy 7 is weak because the pre-ambule to the listed criteria is inadequate. I suggest Policy 7 should open with the following statement:

**The River Cam is of such cultural significance to the history and heritage of Cambridge that it warrants special attention. Any development proposed adjacent to, or nearby the river must include the River Cam as a material consideration in the planning and design.**

**Specifically, development proposals along the River Cam should:.....**

2.3 I also suggest that Criteria a. and b. need to be strengthened:

**a) Include an assessment of views of the river employing verifiable photomontage or similar digital visualisation techniques to demonstrate that the proposed design and scale of the development will not have a deleterious impact on views to, along, and from the river both within Cambridge city and beyond.**

**b) Preserve or enhance the unique physical, natural and culturally distinctive cityscapes and landscapes of the River Cam, especially in the historic core and other conservation areas bordering the river , and where realistic to enhance the setting of the river.**

2.4 Para 2.68 needs to be amended to take full account of the historical and cultural interest of the river corridor. I suggest the following be added after "...heart of the city":

**The entire river corridor passing through Cambridge from Grantchester through Grantchester Meadows to Coe Fen, the Backs, Midsummer and Stourbridge Commons and on to Ditton Meadows and beyond out into South Cambridgeshire is of great historical and cultural significance.**

2.5 Para 2.70 needs to be amended to take proper account of current pressures and conflicts arising from overcrowding on the river.

2.6 Para 2.71 needs to be amended, or a diagram added, to show all the Conservation Areas bordering the river both within the City and adjacent to it. There is a significant view back along the river from the meadows at Fen Ditton to the turrets of King's College Chapel.

***1A1 ii Should the policy make specific reference to 'The Cam Too Project' given its close association with the river?***

2.7 No. The Cam Too Project does not form part of the Local Plan. I have not been aware of any public consultation on a specific proposal, and I could not find any details of the proposal to inform this response.

### **3. Policy 60 – Tall Buildings**

3.1 This Policy, and any consideration of the desirability of tall buildings, needs to be set within a historic environment strategy as noted in my representation 27608.

***1A.3 iv Should the definition of tall buildings in the policy be consistent with the definition in paragraph F.9 of Appendix F of the Plan?***

3.2 The policy should cover any building that breaks the existing neighbouring skyline.

***1A.3 v Policy 60 and Appendix F: Will the Council's Cambridge skyline guidance document remain relevant following the adoption of the Plan?***

3.3 The document will need to be amended to accord with the historic environment strategy required by NPPF para 126, with particular reference to the setting and significance of the whole city as a heritage asset, as well as its specifically designated areas.

3.4 Consideration needs to be given to impacts not only on identified key viewpoints, but also on how to cater for major unexpected impacts, and on how tall buildings are seen in serial vision. The issues are highlighted by Botanic House, Hills Rd: much effort was spent in trying to mitigate impacts on the adjacent II\* listed Botanic Garden, but with inadequate consideration of wider views, notably multiple impacts on Grantchester Meadows. Since submitting my representation, I became aware of David Jones' book "Hideous Cambridge" which also highlights (unforeseen) dominating impacts of Botanic House on small scale Conservation Area streets to the east.

***1A.3 vi Should the views of Cambridge's spires and towers from the Coton footpath and from the M11 be included in paragraph F.20d and Figure F.2 of Appendix F?***

3.5 Yes, and also views from Ditton Meadows and Fen Ditton to the north-east.

***1A.3 vii Should paragraph F.35 make direct reference to the setting and significance of heritage assets?***

3.6 Yes.

#### **4. Policy 61 - Conservation of the Historic Environment**

***1A.4 Does the Plan demonstrate a positive strategy for the conservation and enjoyment of Cambridge's historic environment as required by paragraph 126 of the Framework?***

**4.1 No. The Plan fails, prima facie, to meet even the most basic requirements of para 126 of the NPPF.**

4.2 Policy 61 fails to meet the requirements of para 126 in that it is purely regulatory, and only applies to development proposals. This is confirmed by the Council's proposed monitoring regime and implementation issue: "Quality of applications and of post consent implementation of works ". While this is vitally necessary, it is reactive, ad-hoc, and neither strategic nor in any way holistic in terms of managing, ameliorating and monitoring change in the historic environment.

4.3 Policy 61 is neither a strategy ("a plan of action designed to achieve a long-term or overall aim" - OED), nor "positive" because it is purely reactive. The possibilities of achieving historic environment enhancements, let alone priorities for such enhancement, through Section 106 Agreements are not considered.

#### **4.4 Notably in terms of para 126, the Plan**

- a) includes no strategy for conservation of the historic environment**  
(see paras 4.5 – 4.12 below)
- b) includes no strategy for enjoyment of the historic environment**  
(paras 4.13 – 4.15)
- c) does not identify heritage assets at risk or set out a strategy for dealing with them** (para 4.16)
- d) does not recognise the wider social, cultural, economic or other benefits that conservation of the historic environment can bring** (paras 4.17-4.18)

## **a) no strategy for conservation of the historic environment**

4.5 The conclusions in my M2 Statement (M2/5295), which highlighted the Plan's failure to satisfy NPPF para 126 at a strategic level, have since been massively reinforced by the actions of the City and County Councils and the City Deal Board [e.g. lack of environmental criteria exemplified by the Design Guide brief

[http://www.cambridgeshire.gov.uk/citydeal/downloads/file/223/design\\_guide\\_brief](http://www.cambridgeshire.gov.uk/citydeal/downloads/file/223/design_guide_brief)] and further information which has come to hand.

4.6 Notably, I have discovered that Cambridge was formally recognised in 1988 by the World Heritage Bureau as meeting the UNESCO criteria of Outstanding Universal Value. This was after the Cambridge Colleges and Backs were included in the UK's first Tentative List for World Heritage site status in 1986. Cambridge's nomination lapsed only because the UK Government failed to provide required documents regarding a buffer zone ([www.worldheritagesite.org/sites/twhs.php?id=523](http://www.worldheritagesite.org/sites/twhs.php?id=523)).

**4.7 It needs to be formally and explicitly stated in the Plan that Cambridge has internationally recognised World Heritage significance according to the UNESCO criteria. A headline statement to that effect is an essential prerequisite for a sound Plan, and for a historic environment strategy, and policies to safeguard and enhance that significance, compliant with para 126 of the NPPF.**

4.8 The City Council has demonstrably failed to take the historic environment sufficiently seriously within the Local Plan process. The absence of a strategy is coupled with failures to include Conservation Appraisals within the Local Plan evidence base, or to take any cumulative and strategic overview of significance or issues identified in them.

4.9 The extent to which the Council has turned away from any strategic approach to the historic environment is highlighted by comparing the 2006 Historic Core Conservation Area Appraisal to its vastly inferior draft 2016 replacement, the subject of a recent consultation <https://www.cambridge.gov.uk/consultations/have-your-say-on-the-historic-core-conservation-area-appraisal>. Most notably, the management plan element at the heart of the 2006 Appraisal's exemplary approach has been completely dropped.

4.10 This current situation contrasts sharply, and for the worse, with that in 2006. Then, the new Local Plan was supported by the Historic Core Conservation Area Appraisal which took an innovative and highly-praised (Regional RTPI Award) management plan approach, engaging a wide range of stakeholders in managing complex issues. Below it sat Conservation Plans for Council-owned open spaces, and owners of historic properties were encouraged to prepare their own Conservation Plans. This strategic approach to managing "enormous development pressures" identified as long ago as 2001 (well before the growth promoted by the 2006 Local Plan) was set out in the Council's Open Space Conservation Plans, e.g, for Coe Fen and Sheep's Green :

“1.1.1 The enormous development pressure being experienced by Cambridge has led to the need for a series of strategic studies to ensure that the essential character of the city is maintained.

1.1.2 At the broadest level is the *Landscape Assessment of Cambridge*, which looks at the geology and topography of Cambridge's environs and defines the different 'character areas' of the city. Although the *Historic Core Appraisal* is principally

concerned with the city centre, it builds on the findings of the Landscape Assessment to examine how the city centre sits within its setting and how the different character areas interface with and affect the core area.

1.1.3 The Historic Core Appraisal then looks in detail at the city and provides the strategic framework for protecting and improving the core environment. The individual Conservation Plans for the open spaces fit beneath this umbrella document. They will be complemented by similar plans for major buildings such as the Colleges, guidelines for the development of key sites, proposals for street enhancement and thematic studies on particular topics such as a 'Street Design Guide'. In this way a logical framework from the broad-brush to the site specific is developed to guide the future of the city."

4.11 This framework was further developed in the series of Suburbs and Approaches studies, until cancellation in 2012 (just before the tranche including Milton Road and Histon Road, both now very contentious in relation to City Deal proposals).

4.12 These Appraisals and Studies were intended to be the building blocks of a Historic Environment Strategy SPD (noted in Appendix 2 of my M2 Statement). Draft key issues for the SPD were identified through initial consultation as

- Significance
- Climate Change
- Growth
- Access and equalities
- Managing Change
- Quality of Change

Work on the SPD was later discontinued.

## **b) no strategy for enjoyment of the historic environment**

4.13 Growth delivery since 2006 has focused on the major growth areas, with little consideration of impacts of that growth on the rest of Cambridge, including the historic core. Consequent pressures which have diminished enjoyment of the historic environment include:

- intrusive new development (e.g. damaging impact of the Thompson's Lane hotel on Jesus Green; impacts of the Belvedere, Botanic House and the Marque on Grantchester Meadows);
- new infrastructure schemes: my M2 Statement noted the severe threat to the quiet enjoyment of Ditton Meadows from City Deal schemes (the Chisholm Trail, and notably the proposed Guided Bus route); since then there has been massive local concern about City Deal proposals for bus lanes (and loss of trees and verges) on main approach roads, including Milton Rd and Histon Rd, and cycle lanes on Hills Rd;
- ad-hoc provision of new stopping places, with particularly damaging intrusion on Parkside
- pressures for commuter parking in residential streets (highlighted repeatedly as an issue in the Conservation Area Appraisals).
- new cycle facilities to cater for ever-increasing demand, notably from West Cambridge into the centre, and new cycle stands cluttering up public space;
- overcrowding in the streets of the historic core and on the river
- loss of retail character and diversity in the historic core due to high rentals driving out independents
- intrusive and sometimes damaging commercial activity on historic spaces such as Parker's Piece (for which the 2001 Conservation Plan urgently needs updating).

4.14 The Plan has no strategy for addressing these issues, or for promoting enjoyment of the historic environment as required by NPPF para 126. Instead, there is an ongoing alarming assumption by the Councils and other major players that Cambridge can continue to grow, without harm to its character, provided that enough money is thrown at infrastructure: the environmental consequences and issues of environmental capacity are barely considered.

4.15 This assumption is evident not only in the draft Plan and in the lack of environmental criteria for the City Deal, but also in the exception sites being proposed by the Universities and Colleges, and in (e.g.): “The Case for Cambridge” <http://www.cambridgeahead.co.uk/wp-content/uploads/2015/10/CfC-Prospectus-printable-pdf.pdf> produced by a consortium of Councils, institutions and businesses, and the “Visions of Cambridge in 2065” Cambridge Foresight report (<http://www.csap.cam.ac.uk/media/uploads/files/1/foresight-project-report-logo-block.pdf> - note Jeremy Sanders’ vision for the University).

### **c) Heritage assets at risk?**

4.16 The draft Plan neither identifies heritage assets at risk nor sets out a strategy for dealing with them, as required by NPPF para 126. It does not mention heritage assets which are at risk through redevelopment or overdevelopment.

### **d) no recognition of wider social, economic and environmental benefits**

4.17 To satisfy NPPF para 126, the Plan needs to recognise, explicitly, that it is Cambridge’s continuing worldwide image and reputation as an historic city with a rich cultural heritage, that contributes directly to its continued growth and prosperity, and reinforces its international competitiveness in the high-tech sector, as well as its tourism opportunities.

4.18 Despite Cambridge’s global significance and its local importance, there is no current document, strategy, or SPD produced by the City Council that recognises this fundamental value of the city’s heritage or demonstrates the extent of the benefit that the city’s heritage plays in its economic, social, and environmental development. There is no evident Council commitment to address the pressures and conflicts that the growth agenda has created, both since 2006 and as now proposed in the draft Plan.

#### ***1.A4.i Policy 61: Is the “historic core” clearly defined in the Plan? Is it concurrent with the area delineated as the city centre on the Policies Map (July 2013)?***

4.19 It would be extremely helpful to have a separate map within the Plan clearly showing the historic core and all the individual conservation areas.

#### ***1A4ii Policy 61: Should the wording of the policy provide greater clarity in respect of the requirements for designated heritage assets and other heritage assets. For example, criteria (a), (b) (d) and (e) in particular would appear to relate principally to designated heritage assets as reflected in paragraphs 132-134 of the Framework? Similarly, in Policy 9, should criterion (c) differentiate between designated heritage assets and non-designated assets, as the text sets out the statutory test for the former?***

4.20 The same wording should cover all heritage assets.

***1A4iii Policy 61: In order to fully accord with statutory test, should the wording of criterion (a) be amended to “preserve or enhance” and the second bullet point of paragraph 7.24 be changed to “character or appearance”?***

4.21 Yes.

***1A4. iv Policy 61: Should the stricture requiring full planning applications only for proposed development in conservation areas contained in the extant 2006 Plan be included in the supporting text of the policy?***

4.22 Yes. Too many applications both include inadequate detail and have not been sufficiently thought through to enable proper assessments of their potential impacts. The requirement for full applications is a vital safeguard in development management for conservation areas.

John Preston 3 May 2016