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CC1/1801

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Matter CC1 – Heritage Policies – Protecting and Enhancing the Character of Cambridge

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

Cambridge City Council Respondent Personal Identification: 1801

CCC Local Plan

representor: Cambridge Past, Present & Future (CambridgePPF)

**Matter CC1 – Heritage
Policies**

CCC Representation Number: 26823

**CC1A – Design & Historic
Environment**

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**CC1B – Open Space & Natural
Environment**

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

Matter CC1: Policy 60 and Appendix F – Tall Buildings and the Cambridge Skyline

CCC Representation Number: 26823

Name of Representor: Cambridge Past, Present & Future (CambridgePPF) Number 1801

Issue 1A.3.iv:

Policy 60: *Should the definition of tall buildings in the policy be consistent with the definition in Paragraph F.9 of Appendix F of the Plan?*

Obviously there must be a common definition to avoid confusion. However, CambridgePPF has reservations about the **definition of tall buildings** given in Policy 60. We support the qualitative approach adopted in F.9 of Appendix F, but have reservations about its application.

“Tall” is somewhat misleading in that it implies a description based on height alone. Instead the policy should cover any **emergent building** – that is a building that for reasons of height, scale or mass breaks the skyline created by the existing buildings of the neighbourhood. A six storey building may not be “tall” if surrounded by other buildings of comparable height but a four storey building in a two-storey residential area will be intrusive. “Tall” is therefore a comparative term which must have a defined context.

Including specific height criteria, as in Policy 60 and F.10 of Appendix F, will merely encourage developers to design buildings up to this maximum height. There has been an incremental increase in the height of new buildings in Cambridge over the last few years which the 2012 Guidelines with their specific height criteria have done little to control.

It is self-evident that each development must be assessed on a case-by-case basis. Any building application that for reasons of height, mass or architectural design is intrusive in the setting of its surroundings should trigger the guidelines, irrespective of the actual height of the proposed building.

Policy 60, criterion c. recognises that the scale, mass, and architectural design of a building can be relevant to its overall sense of intrusion. This recognition should be included in the definition.

Policy 60 specifically includes the historic core but fails to make any mention of emergent buildings in Conservation Areas. There should be a **presumption against “tall buildings” (as defined below) in both the historic core and Conservation Areas.**

The inclusion of architectural quality in Policy 60 (criterion c) is welcome. Inevitably tall buildings will be highly visible and prominent, so they must also be of the highest quality architectural design. Cambridge already has its share of “Landmark Buildings” that despite the good intentions of the developer, all too often end up as an eye-sore.

By focusing on the immediate impact of a proposed building, Policy 60 also fails to take account of the impact of intrusive buildings on the wider cityscape. The definition should be extended to cover buildings that will have a deleterious effect on key views of the city, both from within and outside the city.

CambridgePPF therefore proposes the following definition that should be included in Policy 60 and should replace the definition in F9 of Appendix F:

In the Cambridge context, a tall building is defined as any structure that for reasons of height, scale, mass, or architectural design, breaks the existing skyline, or intrudes significantly into the surrounding built environment, or has a deleterious impact on a key view of the cityscape or the city skyline.

In elaborating how Policy 60 might be applied, Paragraph F.10 of Appendix F relies too much on height criteria and should therefore be deleted in its current prescriptive form. We therefore propose the following replacement text:

F.10 Each application will be considered on a case-by-case basis. Within the historic core and other Conservation Areas, there will be a presumption against new buildings that intrude on the historic environment for reasons of height, scale, mass, or architectural design. Such buildings will automatically trigger the need to address the criteria set out within the guidance, particularly buildings that due to their close proximity to heritage assets or potential impacts on key views, are likely to have a deleterious effect on the city skyline. Developers must present a compelling justification as to why a tall building is necessary giving exceptionally strong grounds for its acceptance. Within the city suburbs, buildings that emerge above the height of the surrounding neighbourhood or are intrusive for reasons of scale or mass, will also need to address the criteria. Wherever possible, emergent buildings that break the city skyline should be of the highest quality of architectural design and should be clustered in discrete locations rather than scattered around the city.

Issue 1A.3.v:

Policy 60 and Appendix F: Will the Council's Cambridge skyline guidance document remain relevant following adoption of the Plan?

Matters covered in the guidance document prepared in March 2012 that are still relevant should be incorporated with the guidelines set out in Appendix F to produce a single up-to-date set of guidelines for use by developers. The city skyline is of such significance that clarity must be ensured for the benefit of everybody. If further significant modifications are proposed, these must be subject to public consultation.

The overall approach of the 2012 guidance, and indeed of Policy 60 and Appendix F, is to control the pressure to build upwards if lateral growth is restricted by the Green Belt. CambridgePPF supports this general principle. Cambridge is a city with an international academic reputation manifest in the history and heritage of its architecture, and threatening this global status by excessive emergent buildings could jeopardise the city's continued success. CambridgePPF is not against "tall buildings" as such, but they should be excluded from the historic core and Conservation Areas. Where tall buildings are approved, they should be developed in local clusters, and we look to the City Council to give careful consideration to such an approach.

Issue 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.20.d and Figure F.2 of Appendix F?

A significant positive feature of Appendix F is its listing of the principle views of Cambridge. Paragraph F.20 should include the views from Coton footpath in this listing. Views from the M11 are likely to be masked by the new buildings of the North-West and West Cambridge sites.

Whilst Appendix F recognises the importance of views from both within and outside the city, this is inadequately reflected in Policy 60. The Policy should include a specific criterion relating to views, as follows:

- f. views - applicants should demonstrate through the use of verifiable photomontage or other digital visualisation techniques that key views of the city from both within and outside***

the city are not subject to adverse impact, including views of the city skyline and the River Cam. (This should be inserted as criterion d with existing d. and e. becoming e. and f.)

In addition, criterion a. of **Policy 8: Setting of the City** should include specific reference to conserving important views of the city and its skyline.

Issue 1A.3.vii:

Should paragraph F.35 make direct reference to the setting and significance of heritage assets?

Yes it should as the summary is incomplete without it. The impact of a new building on nearby heritage assets, the townscape, and skyline is covered in Policy 60 criterion b. and in F.33, and should therefore be included in F.35

In addition, the listing of features in Paragraph F.29 should include:

- ***Proximity to heritage assets and their setting***

Issue 1A.3.viii:

Should paragraph F.45 also make reference to the need to ensure that any overshadowing of the public realm should not cause unacceptable harm to amenity?

The matter of not overshadowing the public realm should be specifically included in paragraph F.46 as well as being “...appropriately landscaped, well lit, **and not overshadowed so as to impair the public enjoyment. The public realm should be comfortable to sit in or pass through, and needs....”** .

This raises the matter of the density of tall buildings which if too close together, can seriously diminish the enjoyment of the surrounding public realm. The guidelines in Appendix F need to make the point that the overall number of dwellings per hectare does not always correlate to the height of the buildings and that the residential density can be just as great, if not greater, from a well-designed scheme involving lower buildings of three or four storeys. The belief that Cambridge must grow vertically if it is precluded from growing laterally is mistaken – what Cambridge needs are high quality, low height, residential schemes that sit comfortably with their surroundings.

Other Considerations Regarding Tall Buildings and the Cambridge Skyline:

- CambridgePPF supports the general approach adopted by Policy 60 and Appendix F of wishing to control building heights in Cambridge. There has been a general incremental rise of overall heights experienced within the city over the last few years and this must be controlled. The city’s housing shortage cannot be resolved simply by building taller – we need well-designed, high quality, low-rise residential developments that do not detract from the city’s heritage assets.
- Because of their prominence, tall buildings must be of the highest quality in terms of their architectural design and use of materials
- Tall buildings are best sited in clusters in appropriate places, and not scattered around the city. Clusters of tall buildings in a few well-chosen sites away from the city centre could make a contribution to both residential and employment needs, and we look to the City Council to identify such sites. Tall buildings can play a valuable role in regeneration schemes and developing a sense of place.
- There should be a presumption against tall or intrusive buildings in the historic core or Conservation Areas.
- The concept of “enhancing” the city skyline through the development of a tall building carries significant risk. As Cambridge has already discovered to its cost, all too often

Landmark Buildings, despite the high expectations proposed by the developer, end up by having a detrimental impact, especially if located close to heritage assets. The exhortation to “enhance” included in Policy 60 and Appendix F must be qualified by the requirement for the highest quality standards of both architectural design and the palette of finishing materials.

- vi. The guidelines should make it clear to any potential developer that the necessity for a tall or massive building must be justified. All too often the real reason is the desire by the architect to make a statement that may not be appropriate to its setting. There must be exceptionally strong reasons for acceptance.
- vii. The impact of tall buildings on views of the city, both from within and from around the margin, is of such importance that it warrants inclusion as a criterion listed in Policy 60. Views of the historic city centre and of the River Cam corridor must be protected.
- viii. Particular attention must be paid in the consideration of applications for tall buildings to their impact on local communities. Tall blocks of residential flats are notorious for the lack of any sense of community. The services and facilities to create a vibrant community must be incorporated in the core planning application and not just treated as a S106 add-on.