

Statement of Common Ground as agreed between Cambridge City Council and Historic England

Cambridge Local Plan 2014 - Examination in Public

May 2016

1. Purpose

1.1 During the preparation of the Cambridge Local Plan, Historic England expressed concerns about a number of issues in relation to policies and proposals that could impact upon the historic environment. The purpose of this Statement of Common Ground is to inform the Inspectors and other parties about the areas of agreement between Cambridge City Council and Historic England in relation to detailed policy wording and supporting explanatory text within the Cambridge Local Plan 2014: Proposed Submission¹ document.

2. Background

- 2.1 Historic England is an independent grant-aided body governed by Commissioners. It was established with effect from 1 April 1984 under Section 32 of the National Heritage Act 1983 and initially operated under the title of English Heritage. From 1 April 2015, its operational name changed to Historic England. Historic England is a statutory consultee on all aspects of the historic environment and its heritage assets. Historic England, as English Heritage, submitted representations to the Cambridge Local Plan 2014: Proposed Submission.
- 2.2 This Statement of Common Ground reflects the agreed position between Cambridge City Council and Historic England following discussion and exchange of correspondence.
- 2.3 During Proposed Submission consultation, Historic England made thirty representations to the Cambridge Local Plan 2014: Proposed Submission, of which two (Reps 27345 and 27418) were in support of the Plan. The registered objections were:
 - 27353 on Policy 5: Strategic transport infrastructure
 - 27371 on Policy 7: The River Cam
 - 27374 on Policy 8: Setting of the City
 - 27375 on Policy 9: The City Centre
 - 27378 on Policy 11: Fitzroy/Burleigh Street/Grafton Area of Major Change
 - 27390 on Policy 13: Areas of Major Change and Opportunity Areas -General Principles
 - 27391 on Policy 16: Cambridge Biomedical Campus (Including Addenbrooke's Hospital) Area of Major Change
 - 27395 on Policy 17: Southern Fringe Areas of Major Change
 - 27397 on Policy 18: West Cambridge Area of Major Change

¹ RD/Sub/C/010

- 27401 on Policy 20: Station Area West and Clifton Road Areas of Major Change
- 27409 on Policy 25: Old Press/Mill Lane Opportunity Area
- 27412 on Policy 43: University Faculty Development
- 27422 on Policy 56: Creating Successful Places
- 27427 on Policy 57: Designing New Buildings
- 27432 on Policy 60: Tall Buildings
- 27435 on Policy 61: Conservation and Enhancement of Cambridge's Historic Environment
- 27448 on Policy 62: Local Heritage Assets
- 27450 on Policy 63: Works to a Heritage Asset to Address Climate Change
- 27458 on Policy 85: Infrastructure Delivery, Planning Obligations and the Community Infrastructure Levy
- 27462 on Appendix A: The Development Plan for Cambridge
- 27456 on Appendix B: Site U2 New Museums, Downing Street
- 27567 on Appendix B: Site R44 Betjeman House
- 27582 on Appendix C: Designations Schedule
- 27589 on Appendix D: Southern Fringe Area Development Framework
- 27598 on Appendix F: Tall Buildings and the Skyline
- 27605 on the Glossary
- 27611 on Section One
- 28298 on Section Seven

3. Areas of Common Ground

3.1 This section of the Statement of Common Ground identifies issues raised within Historic England's representations and addresses them in turn. Their representations are primarily related to policies in the Local Plan and associated appendices. The Statement deals, where feasible, with matters relating to appendices with the relevant policy.

Policy 5: Strategic transport infrastructure

- 3.2 Historic England sought amendment to the policy in that, in their opinion, it appeared to support all schemes identified in the Transport Strategy for Cambridge and South Cambridgeshire including the proposed A142 Ely Bypass. The Ely bypass has since been granted planning consent and it is understood that construction is likely to commence later in 2016.
- 3.3 Historic England confirms that, as planning consent has been granted, the objection (Rep 27353) is withdrawn.

Policy 7: The River Cam

3.4 Historic England stated that criterion d) of the policy, referring to the renaturalisation of the river, would not be appropriate in many central areas of the city. The Council has proposed, in its Matter CC1 Hearing Statement, modifications to Policy 7 that would overcome this representation. On this basis, Historic England withdraws its objection in Representation 27371 on condition that the modification in is included in the final Plan.

Policy 8: Setting of the city

- 3.5 Historic England sought amendments to Policy 8 to include a commitment to the preparation of a historic environment strategy for the city.
- 3.6 Historic England are content that the proposed modification to insert a new paragraph and illustrative diagram following paragraph 7.22, as contained in the Council's Matter CC1 Hearing Statement, addresses the comments in relation to the historic environment strategy. Historic England therefore withdraws representation 27374 on the condition that the definition is proposed as a minor modification to the Local Plan.

Policy 9: The City Centre Glossary Appendix C: Designations Schedule

- 3.7 Historic England sought:
 - i. a clarification of the interpretation of "heritage assets";
 - ii. an explanation included in the supporting text to state that the more significant the asset the greater weight that will be given to its preservation and/or enhancement; and
 - iii. a suggestion that, in Appendix C, the statutorily designated heritage assets be listed separately.
- 3.8 Proposed modifications referred to in the Council's Matter CC1 Hearing Statement include the amendment of the description of a Heritage Asset in the Glossary. Historic England is content that this minor modification would overcome representations 27375 and 27605.
- 3.9 Part ii) is dealt with in paragraph 3.57 below.
- 3.10 The Council's Matter CC1 Hearing Statement proposes an explanatory introduction paragraph as a modification to Appendix C. Historic England, following discussion with the Council, is satisfied that this modification would overcome representation 27582 and withdraws the representation subject to its inclusion in the Local Plan. Note: For the sake of clarity, Historic England wishes to add a sentence to the end of the Council's Matter CC1 Hearing

Statement against Appendix C. This is as follows: 'Not all Parks and Gardens identified in the Council's Designation Schedule are included in the National Register of Parks and Gardens.' The Council has agreed to this modification.

3.11 Historic England also withdraws Representation 27375 and 27605 on condition that the proposed modifications (in respect of i) and iii) above) are included in the Local Plan and because matter ii) is adequately dealt with in respect of the Council's proposed modifications to Policy 61 referred to below.

Policy 11: Fitzroy/Burleigh Street/Grafton Area of Major Change

- 3.12 Historic England requested that the supporting text to Policy 11 should offer some guidance in respect of the height of any major redevelopment on this site rather than leave that to the 'Tall Buildings and Skyline' policy.
- 3.13 The Council is proposing a modification to criterion b) of the policy to include reference to the character and setting of the historic core and the need for development proposals to have regard to the setting of nearby listed buildings. It is not considered that the supporting text should include guidance on heights of the development, as how proposals for tall buildings are dealt with is addressed in Policy 60 and Appendix F.
- 3.14 Historic England supports the proposed amendment of criterion b) and withdraws representation 27378 on the condition that the amendment is proposed as a modification to Policy 11 of the Local Plan. This modification will be addressed as part of the Council's Matter CC2A statement.

Policy 13: Areas of Major Change and Opportunity Areas - General Principles

- 3.15 Historic England requested that amendments be made to the final part of the policy and to part k) together with inserting additional sentences into paragraph 3.24.
- 3.16 The Council's Hearing Statement for Matter 9: Areas of major change / major development areas on the edge of Cambridge proposed modifications to the final part of Policy 13 as requested by Historic England. Historic England supports these modifications and withdraws the objection in relation to the policy.
- 3.17 In respect of paragraph 3.24, additional sentences to be included at the end of the paragraph as a minor modification have been agreed by the two parties, but were not referred to in the Matter 9 Hearing Statement. The additional wording is:

In, or adjoining conservation areas, development should preserve or enhance the character and appearance of the area concerned. Buildings that make a positive contribution to local townscape should generally be retained and integrated into development.

3.18 Historic England confirms that this amendment would overcome the objection and, subject to its inclusion in the list of proposed minor modifications, would withdraw the representation (Rep. 27390). This minor modification has been included in the Council's Matter CC1 statement.

Policy 16: Cambridge Biomedical Campus (Including Addenbrooke's Hospital) Area of Major Change

- 3.19 Historic England sought a specific reference to the key views, especially of and from the chalk hills, in criterion a) of the Policy.
- 3.20 The two parties have agreed a definition of "chalk hills" and that it should be included in the Glossary of the Local Plan.
- 3.21 This minor modification has been included in the Council's Matter CC1 statement.
- 3.22 Historic England withdraws representation 27391 on condition that the definition is proposed as a minor modification for inclusion in the final Local Plan.

Policy 17: Southern Fringe Areas of Major Change

Appendix D: Southern Fringe Area Development Framework

- 3.23 Historic England sought specific reference for the key views, the omission of reference to the distinctive gateway in criterion g) and reference in criterion g) to a high quality urban edge, transition from rural to urban and to views from the south and south-east.
- 3.24 The Schedule of Proposed Changes following Proposed Submission Consultation (March 2014) proposes a modification (PM/3/007) to criterion g) of Policy 17 as follows:

g. create a distinctive gateway to the city <u>and a high quality urban edge</u> as approached by road from the south and respect key views;

3.25 Historic England supports this proposed modification and, subject to the agreed definition of "chalk hills" as contained in Appendix 2 of the Council's Matter CC1 statement being included in the final Local Plan, withdraws representations 27395 and 27589.

Policy 18: West Cambridge Area of Major Change

3.26 Historic England sought the strengthening of the policy in relation to building heights and that building proposals of up to 4 storeys will need to be justified

in the context of further analysis of views and masterplanning for the site as a whole.

- 3.27 The Schedule of Proposed Changes following Proposed Submission Consultation (March 2014) proposes a modifications to Policy 18 (PM/3/008; PM/3/009; and PM/3/010) which were referred to in the Matter 9 Hearing Statement.
- 3.28 Historic England does not object to the proposed modifications and withdraws representation 27397 subject to the inclusion of these in the Plan.

Policy 20: Station Area West and Clifton Road Areas of Major Change

Appendix B: Site R44 - Betjeman House

- 3.29 Historic England sought amendments to this policy and Appendix B to seek retention of the Flying Pig public house and to have special regard to the setting of the Botanic Gardens.
- 3.30 The current position in relation to this site is that Betjeman House, Broadcasting House, Botanic House and the public houses are already the subject of an extant and partially implemented planning permission. The consent (06/00552/FUL) is for redevelopment to provide mixed use scheme comprising 156 residential units (including 40% affordable housing); B1 office use; retail / food and drink (Classes A1; A3 and A4 uses, including retention of 'Flying Pig' Public House), and new community use, together with associated basement car parking and servicing; amenity space (external and internal) with associated hard and soft landscaping; including re-location of the war memorial and provision of public art respectively. If another planning application were to be submitted for this site which involved the loss of The Flying Pig, it should be noted that the site is safeguarded as a public house within Appendix C of the Cambridge Local Plan 2014.
- 3.31 Historic England notes that there is an extant and partially implemented permission which retains the Flying Pig PH. We note also that that any future application that proposed the loss of the Flying Pig would need to take account of the fact that the PH is safeguarded within Appendix C of the 2014 Local Plan. However, Historic England would also expect consideration of any such application to consider the positive contribution that the existing building makes to the character and appearance of this part of the conservation area (in accordance with paragraph 72 of the 1990 Planning (Listed Buildings and Conservation Areas) Act). The Council agrees that there are structures on this site that, by virtue of their character, quality and location, make a positive contribution to the character and appearance of the conservation area even though they are not listed. The Flying Pig PH is one such building and, in accordance with Policy 61 b) regard would need to be had to the harm the

loss that the building would cause to the character or appearance of the conservation area.

3.32 The Council and Historic England agree that it would be helpful to provide reference to the historic park and garden in the 'provisional issues identified' section for Site R44 Betjeman House in Appendix B: Proposals Schedule. A minor modification to that schedule is proposed thus:

"Not applicable Development adjacent to Grade II* historic park and garden at Cambridge University Botanic Gardens needs careful consideration."

- 3.33 Historic England welcome reference to Grade II* registered park and garden in the minor modification and, subject to it being included in the final Local Plan, conditionally withdraws representations 27401 and 27567.
- 3.34 These modifications will be addressed in the Council's Matter CC2C statement.

Policy 25: Old Press/Mill Lane Opportunity Area

- 3.35 Historic England sought reference in the supporting text to a commitment to review the parameters in the SPD as part of the Local Plan process, and to ensure that such development would be appropriate in the context the NPPF.
- 3.36 The University has commenced pre-application discussions to bring forward this site. It is acknowledged that an SPD was adopted for the site in 2010 but a revised Historic Core Conservation Area Appraisal is in the process of being prepared which will be more up-to-date in certain aspects relating to the development of this site. As such, the City Council agrees that where appropriate, if the SPD and Appraisal differ, the Appraisal, once it has been formally adopted by the Council, should take precedence in considering development proposals for this site. A minor modification is proposed to paragraph 3.103 to state this.
- 3.37 Historic England is satisfied that this clarification by the Council has addressed the issue and we therefore withdraw our objection to Policy 25.

Policy 43: University Faculty Development – New Museums Site

Appendix B: Site U2 - New Museums, Downing Street

3.38 Historic England were concerned that this site was included in the plan given the apparent limited opportunities for change. Demolition of buildings which contribute positively to the conservation area would be contrary to policy 133 of the NPPF. The scope for sensitive development should be identified, and development should not harm the heritage assets on the site.

- 3.39 Cambridge City Council has produced a New Museums Site Development Framework in support of draft Local Plan policy 43 in order to help all parties involved (such as the Council and the University of Cambridge) deliver extensive site improvements. These include:
 - improved university facilities;
 - changes to the public realm;
 - providing better access for all; and
 - adopting more sustainable forms of development while respecting the site's heritage and surroundings.
- 3.40 Following a six week consultation period, the final New Museums Site Development Framework was agreed at the Council's Development Plan Scrutiny Sub-Committee on 14 March 2016, in anticipation of the adoption of the Local Plan, and it was agreed that it should be carried forward for adoption as a Supplementary Planning Document at the same time as the Local Plan is adopted.
- 3.41 Historic England notes that the first phase of works to the Arup building is now nearing completion and planning permission has been granted for phase II. Given our engagement in the production of the Development Framework, we withdraw our objection to this Policy (Rep. 27412) and Appendix B; Site U2 (Rep. 27456).

Policy 56: Creating Successful Places

- 3.42 Historic England were concerned as to whether the policy provides sufficient guidance given that other policies and guidance in the plan (policy 60 and Appendix F, some site allocations) suggest tall buildings/landmark buildings may be acceptable.
- 3.43 The Council considers that the local plan should be read as a whole and that adequate guidance in respect of how tall buildings proposals are to be considered are contained in Policy 60, which itself is proposed for amendment following discussion with English Heritage. It is therefore not appropriate to address tall building issues in Policy 56.
- 3.44 Historic England notes that the Council's comments about the need to consider the Plan as a totality, and that tall buildings are dealt with in Policy 60. In the light of the agreed refinements to Policy 60, Historic England withdraws its objection to Policy 56.
- 3.45 Further, Historic England does not wish to comment on the aspect of policy 56 raised by the Inspector in Matters and Issues 1A.3 i). However, Historic England notes the question raised by the Inspector on Policies 56 to 58 inclusive in Matters and Issues 1A.3 iii). In Historic England's opinion, these

policies do not promote a single architectural style. Policies 56 h), 57a), 58a), 58b), 58c) and 58d) are concerned with local distinctiveness and do not prescribe a specific architectural style.

Policy 57: Designing New Buildings

- 3.46 Historic England support this policy but have some concern as to whether the policy provides sufficient guidance given that other policies and guidance in the plan (policy 60 and Appendix F, some site allocations) suggest tall buildings/landmark buildings may be acceptable. It would be helpful, in this chapter, to refer to background evidence documents to enable consideration of this matter for instance, the Cambridge Green Belt Study (LDA, 2002), and recent updates. The LDA study addresses the linkage between the urban edge and the historic core; the Local Plan would benefit from being more explicit on how perception of the city in the landscape is important to the character of Cambridge.
- 3.47 The Council considers that the local plan should be read as a whole and that adequate guidance in respect of how tall buildings proposals are to be considered are contained in Policy 60, which itself is proposed for amendment following discussion with English Heritage. It is therefore not appropriate to address tall building issues in Policy 57.
- 3.48 Historic England notes that the Council's comments about the need to consider the Plan as a totality, and that tall buildings are dealt with in Policy 60. In the light of the agreed refinements to Policy 60, Historic England withdraws its objection to Policy 57.
- 3.49 Further, Historic England notes the question raised by the Inspector on Polices 56 to 58 inclusive in Matters and Issues 1A.3 iii). In Historic England's opinion, these policies do not promote a single architectural style. Policies 56 h), 57a), 58a), 58b), 58c) and 58d) are concerned with local distinctiveness and do not prescribe a specific architectural style.

Policy 60: Tall Buildings

Appendix F: Tall Buildings and the Skyline

3.50 Historic England considers it undesirable to specify a building height in the historic core where other considerations such as the historic legibility and character of the conservation area should be accorded great weight. In particular, the area is defined by the spires and towers relating to colleges and churches; such buildings have historically been dominant, and should continue to be so. The significance of the historic core is set out in the Council's historic core character appraisal, which should be used to assess development. The following changes were sought:

- Omit the words 'or exceed 19m within the historic core (see Section Three, on City Centre) or 13m outside it';
- Amend part b) to read: 'Tall buildings will not be permitted within the historic core. Where proposals are made outside the historic core, the potential for impacts on the historic character and significance of Cambridge, as well as any localised impacts on the character and townscape of the particular location, will be assessed carefully. The dominance of the city's spires and towers should remain unchallenged.';
- Omit the penultimate sentence of the policy referring to maximum heights;
- Define the historic core for the purposes of this policy;
- The evidence base for determining the location of tall buildings should be referred to; and
- Other considerations such as the historic legibility and character of the conservation area should be accorded great weight.
- 3.51 Historic England requested that the guidance that forms Appendix F is reviewed including criteria 1 (location), 2 (historic impact), 4 (amenity) and 5 (public realm).
- 3.52 The Council has engaged in considerable discussion with Historic England on this matter. As a consequence, modifications are proposed to Policy 60, paragraphs 7.16 to 7.19 and Appendix F, as set out in the Council's Matter Statement CC1. In summary, the Policy 60 modifications:
 - Change the definition of a tall building to accord with the definition as contained in Appendix F;
 - Remove reference to building heights;
 - Amend criterion b) in order that impact can be assessed in a manner that conforms with the NPPF;
 - Provides a reference to the latest tall buildings guidance published by Historic England in 2015;
- 3.53 The supporting paragraphs 7.17 to 7.19 are replaced by six new paragraphs that provide a more appropriate context for the modified policy and a link to Appendix F.
- 3.54 Appendix F is proposed to be modified in a number of areas including:
 - the inclusion of a map at Figure F.1 to identify the extent of the historic core referred to in the policy;
 - reference to the latest tall buildings guidance published by Historic England in 2015; and

- identifying that the appropriate conditions for tall buildings identified in paragraph F.31 would not generally be appropriate within the historic core due to the higher level of sensitivity in this area resulting from the presence of a significant number of highly graded heritage assets.
- 3.55 On the basis of the modifications proposed by the Council, Historic England is now prepared to withdraw its objection to Policy 60.

Policy 61: Conservation and Enhancement of Cambridge's Historic Environment

- 3.56 Historic England were concerned that the policy it is not distinctive to Cambridge, or proactive in its approach to the historic environment of the city. A number of changes were sought to the policy and supporting paragraphs, as detailed in representation 27435.
- 3.57 The Council proposed modifications PM/7/003; PM/7/004; and PM/7/005 at the time the Local Plan was submitted for examination. Further modifications are proposed to Policy 61 and supporting paragraphs in the Council's Matter Statement CC1 following discussion with Historic England officers. Further minor modifications are proposed by the City Council in respect of paragraph 7.23 to explain that the higher the significance of the heritage asset, the more weight will be given to its preservation and/or enhancement. This modification has been proposed in response to Historic England's representation against Policy 9 (representation 27375).
- 3.58 Historic England welcomes the clarification that is brought to Policy 61 through the Council's proposed modifications, including the modification made in response to our representation against Policy 9. Historic England is therefore prepared to withdraw its objection to both Policy 9 and Policy 61.

Policy 62: Local Heritage Assets

- 3.59 Historic England sought an amendment to the wording of Policy 62 to read: 'The Council will actively seek the retention of local heritage assets...'
- 3.60 The Council's Matter Statement CC1 includes this request as part of a proposed modification to the policy.
- 3.61 Historic England agrees with the change proposed by the Council and, on that basis, is prepared to withdraw the objection (Rep. 27448).

Policy 63: Works to a Heritage Asset to Address Climate Change

3.62 Historic England sought amendments to the policy to ensure that it takes account of the significance of heritage assets in a proportionate manner.

- 3.63 The Council proposed modification PM/7/007 at the time the Local Plan was submitted for examination which respond to these concerns.
- 3.64 Historic England notes the changes proposed by the City Council and, on that basis, is prepared to withdraw the objection (Rep. 27450).

Policy 85: Infrastructure Delivery, Planning Obligations and the Community Infrastructure Levy

- 3.65 Historic England sought the inclusion of 'heritage assets', in the list on page 228 of the Local Plan, of items that will be eligible to receive s106 contributions.
- 3.66 The Council included reference to the use of section 106 contributions towards the conservation or enhancement of heritage assets in its draft Planning Obligations Supplementary Planning Document, which was subject to public consultation from 2 June to 14 July 2014 but will not be adopted until the outcome of the Local Plan examination is known. The policy was considered at the examination in Matter 5 where there was no further discussion on this point.
- 3.67 Subject to the adoption of the draft Planning Obligations Supplementary Planning Document, Historic England is now willing to withdraw our objection to Policy 85. It is the intention of the Council to adopt the draft Planning Obligations Supplementary Planning Document at the appropriate juncture.

Appendix A: The Development Plan for Cambridge

- 3.68 Historic England sought, in connection with the list of SPDs listed in paragraph A.2, the preparation of a Historic Environment Strategy SPD and an updated Historic Core SPD.
- 3.69 The Council has prepared an updated Historic Core Appraisal and, as explained above in relation to Policy 61 and the supporting paragraphs, a modification is proposed to the plan to refer to the structure and content of the Historic Environment Strategy for Cambridge.
- 3.70 Historic England note the proposed changes to Policy 61 and the recent preparation of an updated Historic Core Character Appraisal and are prepared to withdraw the objection (Rep.27462).

Section One

3.71 Historic England recommended that Scheduled Ancient Monuments (SAMs) and Historic Parks and Gardens on Historic England's Register should be marked on the policies map, as a heritage asset that policy 61 applies to.

- 3.72 The Schedule of Proposed Changes following Proposed Submission Consultation (March 2014) proposes a modification (PM/C/001) which suggests that a new paragraph C.1 is included at the beginning of Appendix C: Designations Schedule for clarity.
- 3.73 Historic England notes the proposed insertion of new paragraph C.1 and, subject to that modification being incorporated into the plan, withdraws the objection (Rep. 27611).

Section Seven

- 3.74 Historic England stated that it would be helpful, in this chapter, to refer to background evidence documents to enable consideration of this matter for instance, the Cambridge Green Belt Study (LDA, 2002), and recent updates. The LDA study addresses the linkage between the urban edge and the historic core; the Local Plan would benefit from being more explicit on how perception of the city in the landscape is important to the character of Cambridge. The representation repeated the comments made against Policy 57 and referred to above.
- 3.75 The Cambridge Green Belt Study (LDA, 2002) has been updated by the Cambridge Inner Green Belt Boundary Study of November 2015 as referred to in the Council's Matter Statement CC1. That document forms part of the evidence base for informing the implementation of Policies in Section Seven of the Plan.
- 3.76 Historic England welcomes the preparation of the Cambridge Inner Green Belt Boundary Study of November 2015 and Historic England therefore withdraws its objection on this matter.

4. Conclusion

- 4.1 Cambridge City Council and Historic England agree that matters of concern originally raised in representations have been and continue to be addressed. Therefore, on the basis of this statement and the inclusion of the modifications now proposed by the Council, Historic England conditionally withdraws the following representations:
 - 27353 on Policy 5: Strategic transport infrastructure
 - 27371 on Policy 7: The River Cam
 - 27374 on Policy 8: Setting of the City
 - 27375 on Policy 9: The City Centre
 - 27378 on Policy 11: Fitzroy/Burleigh Street/Grafton Area of Major Change
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- 27462 on Appendix A: The Development Plan for Cambridge
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- 27598 on Appendix F: Tall Buildings and the Skyline
- 27605 on the Glossary
- 27611 on Section One
- 28298 on Section Seven

AGREEMENT

Signed by:

Sara Saunders

Sara Saunders on behalf of Cambridge City Council

Dated: 3 May 2016

Natalie Gates

Natalie Gates on behalf of Historic England

Dated: 3 May 2016