



Historic England

Ms Fiona Bradley
Greater Cambridge Shared Planning
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Direct Dial: 07554 437321

Our ref: P01513293

5 September 2022

Dear Ms Bradley

**T&CP (Development Management Procedure) (England) Order 2015
& Planning (Listed Buildings & Conservation Areas) Regulations 1990**

**LAND NORTH OF CAMBRIDGE NORTH STATION, MILTON AVENUE,
CAMBRIDGE, CB4 0AE
Application No. 22/02771/OUT**

Thank you for your letter of 24 June 2022 regarding the above application for planning permission. On the basis of the information available to date, we offer the following advice to assist your authority in determining the application.

Summary

This is a hybrid planning application for a major mixed-use development (to include residential and commercial uses) at the above site. Historic England has been consulted on the basis that the proposed development has the potential to affect the setting of various heritage assets including highly-graded listed buildings, conservation areas, and Registered Park and Gardens.

This follows our extensive involvement in pre-application discussions concerning this site with the applicant and other relevant parties, as well as our involvement with the emerging North Cambridge Area Action Plan. On the basis of what has been provided and our own understanding of the site and its context, we consider that the proposed development would harm the significance of Biggin Abbey, the Stourbridge Common and Fen Ditton Conservation Areas and more generally, compromise the important relationship between Cambridge city and the surrounding countryside.



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Correspondence or information which you send us may therefore become publicly available.





Historic England Advice

Significance

Although there are no designated heritage assets within the application site, our records reveal that the following designated heritage assets lie within 1.5 km radius of the site:

- 10 listed buildings at grade I and II*
- 42 listed buildings at grade II
- 2 scheduled monuments
- 5 conservation areas

This however is not an exhaustive list of all those assets that might be affected as assets beyond this radius such as Anglesey Abbey PAG may also be affected. We note the accompanying Heritage Statement, which provides some useful analysis and observations, and also the set of visualisations which provide a useful indication of the possible visual effect and likely impact. Much of the assessment seems fair and we agree that not all of those heritage assets that have been identified would be likely to have their significance affected.

Having considered the proposal we are particularly concerned with the effect on the following heritage assets.

Riverside and Stourbridge Common Conservation Area

This is a large conservation area that stretches between Victoria Bridge right up to the city boundary and includes the river, its frontages and towpaths along with the characteristic green open spaces which are a key element of how the conservation area is experienced and appreciated. It abuts Fen Ditton conservation area with which it forms a linear 'green corridor' which penetrates the city east to west, bringing the countryside into the heart of the busy city.

Fen Ditton Conservation Area

The historic core of Fen Ditton village is set on rising ground to the east of the River Cam valley. The principal historic building is the parish church of St Mary the Virgin (grade I listed) with a landmark west tower. The church stands at the junction of High Street and Church Street to the west of the church is Fen Ditton Hall, the substantial relic of a once larger Jacobean House (grade II*).

Fen Ditton is separated from Cambridge by Ditton Meadows and Stourbridge Common, which occupies the land to the east of the Cam. Although modern development can be seen on the edges of the common it is small in scale, and the scale of open landscape survives. Like Granchester Meadows to the southwest of the town, Ditton Fields along with the other sequence of common land and open spaces contributes to the distinct relationship between town and country which is an attractive part of Cambridge's historic character.

Baits Bite Conservation Area

The conservation area abuts the north end of Fen Ditton Conservation Area It is characterised by watermeadows with drains and open fenland now in agricultural





use. It includes the river on its western side and the lock which is listed at grade II. The C14 farmhouse known as Biggin Abbey lies on the eastern side of the conservation area. It was part of the Bishop of Ely's residence and the site was originally moated. It sits on elevated ground allowing long views across to the west and south, and is listed at grade II*.

All of these conservation areas adjoin to form a continuous chain, which reaches from just south of Milton to the City Centre. The river, towpaths and fields are very well used by runners, rowers, cyclists and walkers alike and the designation is recognition that the riverside meadowland spaces are an important component of the historic character of the city and its environs.

Impact

The proposal comprises:

- An Outline for the construction of three new residential buildings of between four to eight storeys, two commercial buildings of five storeys, and associated car and cycle parking and infrastructure works;
- A Full Application for the construction of three commercial buildings of four and seven storeys associated car and cycle parking, a multi-storey car and cycle park and associated landscaping and infrastructure works.

The site is allocated in the South Cambridgeshire Local Plan 2018 (policy SS/4) for mixed-use development, including employment, commercial, retail, leisure and residential uses. We therefore acknowledge that the proposal is broadly in conformity with the policy and that this lends a certain amount of weight in its favour. Notwithstanding this, we have the following concerns in terms of the impact that the proposed development would have upon the historic environment.

We are however particularly concerned at the scale and massing and design of the proposed buildings, and the visual impact that they would have. The proposed buildings range from 14 metres up to a maximum of 30 metres with additional height of between 3 to 4.5 metres to account for rooftop plant. Whilst we note the assertion that they have been *carefully articulated...to avoid an urbanising wall of development*, the accompanying visualisations - particularly 6, 8, 9, 15, would seem to suggest otherwise. We consider the buildings have a solid, block-like appearance, which we believe only serves to compound the visual impact for the worse. We have raised these concerns previously when we commented on the emerging AAP, and believe that a reduction in scale and massing is necessary in order to ameliorate the negative visual impact.

We are also concerned to note that building S04, by the application's own admission, exceeds the heights that are benchmarked in the AAP. We are not convinced that this height increase is necessary or justified, and believe that it should be revised.





Whilst we acknowledge that there are indeed locations within the conservation areas where the development would not be seen or experienced, we believe that the development would actually appear as much more than mere brief glimpses through gaps and above tree tops. In our opinion the development would be readily visible and would feature prominently within some of the more rural views across the river, and meadowland.

As we observed from our site visit, the existing neighbouring buildings such as the hotel are clearly apparent and have a distinct presence and visual impact from various locations within the Baits Bite Lock and Fen Ditton conservation areas, as well as from the public footpath that passes close to Biggin Abbey on its north side. We therefore believe that the proposed buildings would bolster and consolidate the sense of a strident, urban sprawl within what has historically been a low-lying hinterland.

This would constitute a permanent change to the essential visual quality of the wider setting of these heritage assets, and would have a negative effect upon the way in which they are experienced and appreciated.

We understand that landscaping is also proposed to help assimilate the development and soften its impact. Whilst this may be successful in helping to soften the appearance of the development in local townscape terms, we are not convinced that it would be very effective in mitigating the visual effects of the development in terms of long-views given the large scale of these buildings. We would also question whether there is in fact sufficient space for planting along the eastern boundary with the railway track.

In our view the proposal is at odds with policy HQ/1 Securing High Quality Design of the SDC local plan specifically a, b and d; and policy 9 of the Action Area Plan.

Impact upon Anglesey Abbey registered park and garden

We are disappointed to note that the view from the termination of Coronation Avenue has not been fully assessed. We are concerned that the wider panoramic vista from the end of the Avenue may be interrupted by views of taller buildings and we are concerned that, contrary to policy 194 NPPF, it has not been conclusively demonstrated that this would not be the case.

Policy context

The importance attached to setting is recognised by the Government's National Planning Policy Framework (NPPF) and in guidance, including GPA3 The Setting of Heritage Assets 2nd edition (published by Historic England on behalf of the Historic Environment Forum, December 2017). The NPPF defines the setting of a heritage asset as, 'The surroundings in which a heritage asset is experienced. Its extent is not fixed and may change as the asset and its surroundings evolve. Elements of a





setting may make a positive or negative contribution to the significance of an asset, may affect the ability to appreciate that significance or may be neutral' (Annex 2).

As the proposal would affect the setting of listed buildings, the statutory requirement to have special regard to the desirability of preserving the setting of a listed building (s.66 (1), 1990 Act) must be taken into account by the local authority when making its decision.

Our advice reflects guidance in the good practice advice notes produced by Historic England on behalf of the Historic Environment Forum in GPA 2; Managing Significance in Decision Taking in the Historic Environment and GPA 3; The Setting of Heritage Assets.

Paragraph 189 advises that heritage assets are an irreplaceable resource that should be conserved in a manner appropriate to their significance...

Paragraph 199 states that "when considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset's conservation (and the more important the asset, the greater the weight should be)".

Paragraph 200 develops this further "any harm to, or loss of, the significance of a designated heritage asset (from its alteration or destruction, or from development within its setting), should require clear and convincing justification".

Paragraph 202 then states that where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal.

Historic England's position

We conclude that the scale and massing of the proposed development would result in profound changes to the wider setting of designated heritage assets, most notably the riverside conservation areas which we believe make a positive contribution to the visual quality and historic character of the city.

Whilst the applicant has acknowledged that the development would have some impact on the historic environment, we believe that they have underplayed both the contribution that the riverside conservation areas make to the local distinctiveness and character of the city, and also the effect that the development would have upon that character.

We believe that the interruption of the development in wider views from across the river would have a negative effect upon the way that it is experienced and appreciated. We therefore judge that the proposed development would result in an overall moderate level of less than substantial harm to the significance of Fen Ditton, Baits Bite Lock and Riverside and Stourbridge Common Conservation areas, and we object to the development in its present form.





We are also concerned that this planning application precedes the submission for examination and adoption of the North Cambridge Area Action Plan.

Recommendation

Historic England objects to the application on heritage grounds.

We consider that the application does not meet the requirements of the NPPF, in particular paragraph numbers 194, 200.

In determining this application you should bear in mind the statutory duty of section 66(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990 to have special regard to the desirability of preserving listed buildings or their setting or any features of special architectural or historic interest which they possess; and section 72(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990 to pay special attention to the desirability of preserving or enhancing the character or appearance of conservation areas.

Your authority should take these representations into account in determining the application. If you propose to determine the application in its current form, please inform us of the date of the committee and send us a copy of your report at the earliest opportunity.

Yours sincerely

Neville Doe

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