

Matter SC4 – Natural and Historic Environment

Sub-Matter SC4D Policy NH/15: Heritage Assets and Adapting to Climate Change

Representation Number: 58923

Representation Identification: 20942

Examination in Public of the SCDC Submitted Local Plan 2013

Written Statement from Cambridge Past, Present & Future

25th November, 2016

CambridgePPF is in the process of agreeing a Statement of Common Interest with South Cambridgeshire District Council on those Policies included under Matter SC3 and SC4 where CambridgePPF has made Representations. At the time of submitting these Written Statements, our responses to the Issues raised by the Inspector have been modified in the light of changes to the Policies proposed by the Council as part of the negotiation of the Statement of Common Ground.

Matter SC4 Natural and Historic Environment
SC4D Policy NH/15: Heritage Assets and Adapting to Climate Change
Representation 58923

Issue v.:

Does the wording of Policy NH/15 fully reflect the approach of the NPPF particularly in addressing the balance of climate change benefits against the potential harm to the heritage asset? Could the policy be better worded in this regard?

- CambridgePPF believes the wording of Policy NH/15 does not fully reflect the approach of the NPPF and is too weak. To bring it into alignment, CambridgePPF believes that paragraph 1 of the policy requires a condition to the effect that the sustainable use does not cause harm to the heritage asset
- Paragraph 2 of the policy talks loosely about “adequately safeguarding” which is too weak. We also believe reference should be made to heritage character, and propose the change of wording presented below.

Issue vi.:

The NPPF does not make direct reference to ‘historic buildings’ but rather the historic environment, listed buildings, and heritage assets. Should the wording of Policy NH/15 be revised to provide greater consistency with the NPPF?

- Historic buildings comprise only an element of the broader historic environment so the wording should be changed to bring the policy into alignment with the NPPF

Statement of Common Ground:

- Discussions with the Council are continuing although several matters have already been agreed
- CambridgePPF is seeking to amend Clause 1 of Policy NH/15 as follows:
“.....supported as a sustainable resource provided such re-use does not cause harm to the heritage asset.” This matter is still under discussion.
- The Council agrees to the strengthening of the text of Clause 2 by replacing ‘...adequately safeguard...’ with ‘...effectively safeguard...’
- The Council argues that ‘character’ does not reflect the NPPF which focuses on the ‘significance’ of heritage assets. ‘Character’ is more appropriate for Policy NH/14. CambridgePPF agrees this point.
- CambridgePPF’s concern that adapting heritage assets to climate change through, for example, energy efficiency measures should not cause damage to the assets. There could be occasions when the implementation of the first paragraph could cause damage to the heritage significance by adapting the building to climate change. Wording for an additional paragraph in the supporting text is under discussion. CambridgePPF believes that Paragraph 6.62 should be strengthened as follows:

“Harm to heritage assets must be avoided whenever possible, especially substantial harm to or total loss of significance of the designated asset. When changes or alterations are proposed to heritage assets as an adaptation to climate change which will have a potentially negative effect, then alternative solutions that cause no or less harm should be identified. Where conflict between.....”