

Appendix A: Table of Historic England's comments on the Draft North East Cambridge Area Action Plan

Page	Section	Support/ Object/Com ment	Comments	Suggested Change
13	Question 1	Object	<p>What do you think about our vision for North East Cambridge?</p> <p>We welcome the regeneration of this area of Cambridge and recognise the exciting opportunity that this brings to develop a modern and distinctive new community for the city. We welcome the aspirations to create a real sense of place and also to firmly integrate the area within the surrounding communities. There is however no mention of the historic environment and the importance of drawing on, reflecting, protecting and enhancing that through new development. Please amend to include reference to that in your vision.</p>	<p><i>We suggest that you amend the vision to include reference to the historic environment and the importance of drawing on, reflecting, protecting and enhancing that through new development. .</i></p>
15	Question 3	Comment	<p>Are the new 'centres' in the right place and do they include the right mix of activity?</p> <p>Is it worth including provision for places of worship?</p>	
16	Question 4	Object	<p>Do we have the right balance between new jobs and new homes?</p> <p>We continue to be concerned about the sheer scale of residential and employment growth on the site and the capacity of the site to absorb such growth as an appropriate density for the City and its setting (more on this in question 6)</p>	<p><i>We look forward to continuing to work with you regarding densities, heights, scale and massing on this site. We look forward to seeing the report that you are commissioning in this regard.</i></p>
17	Question 5	Comment	<p>Are we are planning for the right community facilities?</p> <p>Is it worth including provision for places of worship?</p>	
18	Question 6	Object	<p>Do you think that our approach to distributing building heights and densities is appropriate for the location?</p> <p>We welcome the on-going work you are undertaking in relation to building heights, densities and setting in relation to the historic environment. As you know, we are very concerned about the current building heights and densities being proposed within this area as part of the Area Action Plan. We are also concerned that decisions regarding height and density</p>	<p><i>We look forward to continuing to work with you regarding densities, heights, scale and massing on this site. We look forward to seeing the report that you are commissioning in this regard.</i></p>

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			are evidence-based and informed by the evidence, not simply justified by retrospective evidence. We look forward to continuing to work with you on this aspect of the Plan.	
19	Question 7	Object	Are we planning for the right mix of public open spaces? We suggest that it might be appropriate to include planting/landscaping along the western edge of Chesterton Fen to soften the edge of the railway and built for of the development in views across the river and from the Fen Ditton Conservation Area, as well as softening the edge of the city and its overall setting.	<i>Include planting along the western edge of Chesterton Fen to soften the edge of the railway and built development.</i>
36	Strategic Objectives	Object	Strategic Objectives There is still nothing within the strategic objectives about the importance of the historic environment and in particular that development of this area protects and enhances the wider setting of the city of Cambridge as well as responding to individual heritage assets such as the conservation areas etc. Please include reference to this in your objectives	<i>Include reference to the historic environment in the objectives, in particular, the need to protect and enhance the wider setting of the city of Cambridge as well as responding to individual heritage assets such as the nearby conservation areas etc.</i>
39	Figure 10	Support	We welcome the landscape buffer shown on figure 10 along the edge of Chesterton Fen. We consider this important in softening the edge of the built development and protecting the setting of the City more generally.	
48	Figure 13	Object	A small point but increased floor to ceiling heights will inevitably increase overall building height. We need to be careful about how building heights are expressed in terms of storeys or metres as clearly floor to ceiling heights will have a bearing on this. This will need to be factored into any work on taller buildings and heritage currently being undertaken.	<i>Factor in ceiling heights in work on taller buildings and heritage impact</i>
60	Policy 4c	Object	Flood Risk and Sustainable Drainage Whilst we broadly welcome the inclusion of a policy in relation to sustainable drainage reference should be made to the need to consider archaeology in the design and layout of sustainable	<i>Include reference to buried archaeology in relation to SuDs.</i>

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			<p>drainage systems.</p> <p>Archaeology is an irreplaceable resource and should be conserved in a manner appropriate to its significance. Where a site on which development is proposed includes or has potential to include heritage assets with archaeological interest, local planning authorities should require developers to submit an appropriate desk-based assessment and, where necessary, a field evaluation. Reference could be made to this in sections 4.1 and 5 and Appendix A.</p> <p>Buried waterlogged archaeology may be at particular risk from changes in the water environment. Consideration should be given to the most appropriate course of action to protect buried waterlogged archaeology through the design of Sustainable Drainage Systems. Waterlogged deposits, such as peat have the potential to preserve organic remains that are relatively rare in the archaeological record. They are of great importance for the information they provide about everyday objects such as drinking and eating vessels (wooden bowls, leather bottles, horn cups), clothing (fabric, shoes), modes of transport (boats, trackways) and equipment of subsistence (fishtraps). To maintain the preservation of organic materials, it is essential that the conditions which contributed to their survival (waterlogged; anoxic) remain the same. While saturated with water, oxygen is excluded which limits the presence/action of most soil fauna (insects, moulds, and micro-organisms) and fungi which feed on organic matter. The lowering of the water-table in an area could result in the remains becoming exposed to oxygen, which can enhance the degradation and loss of any remains that are present. We suggest that the SPD should discuss how these sorts of sites will be managed, which makes</p>	

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			<p>reference to the Historic England 'Preserving Archaeological Remains' guidance (2016): https://historicengland.org.uk/images-books/publications/preserving-archaeological-remains/</p> <p>Reference should be made to the Ciria SuDS Manual which offers more guidance.</p> <p>See our comments on historic environment policy framework in respect of archaeology</p>	
77	Policy 6a	Object	<p>Distinctive design for North East Cambridge We welcome the reference in the first paragraph to Cambridge's heritage and townscape qualities and the unique characteristics of Cambridge and Cambridgeshire. Criterion e could be elaborated to include reference to local building materials and vernacular. For example, Cambridge brick is an obvious response to the historic building materials in the area and can be used to enable new development to both respond to, and be better absorbed into, the local environment.</p>	<i>Elaborate criterion e to include reference to local building materials and vernacular</i>
79	Design Codes	Object	<p>Design Codes We welcome reference to a design code for the area which will help to create a well-designed place that sits well within the landscape and responds to local heritage. These paragraphs could be further improved by specifically referencing the historic environment and local building materials etc.</p>	<i>Include reference to historic environment, building materials and local vernacular</i>
86	Policy 7	Object	<p>Legible Streets and Places Legibility is important in any new community. The use of existing landmarks and key views into an out of the development can be an important aspect of this design process. A criterion should be added to specifically highlight the opportunities for key views to be used to enhance legibility within the development e.g. to church spires and other</p>	<p><i>Add criterion to protect key views or landmark buildings e.g. churches to increase legibility</i></p> <p><i>Add criterion in relation to role of trees, landscaping and green infrastructure in protecting and</i></p>

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			<p>landmark buildings that may be seen from within the site.</p> <p>Trees and landscaping play an important role in helping to protect and enhance the setting of the City. Reference should be made to this in the policy.</p>	<p><i>enhancing the setting of the wider City and historic environment.</i></p>
103	5.4 Density, heights, scale and massing and Policy 9	Object	<p>Density, heights, scale and massing</p> <p>We continue to express our significant concerns regarding the current proposed heights and densities for North East Cambridge. We reiterate the importance of thoroughly testing this approach with respect to impact on heritage assets, the historic environment and the wider setting of the city.</p> <p>We understand that you are commissioning some further work to explore this aspect in more detail which we very much welcome. However, it will be important that this work truly shapes your proposals and that you respond to that, rather than merely justifying a particular approach. It is important that you explore other ways to increase densities rather than simply through height.</p> <p>The comparative height examples are really helpful in illustrating what might be proposed (as indeed the comparison green space figures were also very useful). Of course, it is not just height, but also massing, that will be critical.</p> <p>We welcome the requirement in the policy for proposals to include appropriate landscape and visual assessment as well as heritage impact assessment and massing studies, together with the wider skyline and heritage assets. We welcome the specific reference in the policy to Fen Ditton Conservation Area and other heritage assets.</p>	<p><i>We look forward to continuing to work with you regarding densities, heights, scale and massing on this site. We look forward to seeing the report that you are commissioning in this regard.</i></p>
107	Figure 23		Residential densities	<i>Include examples of comparative</i>

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			<p>We continue to have significant concerns that the densities shown on this Plan are simply too high for the Cambridge context. We also note that there seem to be some discrepancies between the densities in figure 2 and the building heights in figure 21. E.g. an area shown as 5-6 storeys also having a density of 350dph.</p> <p>It might be useful to have some comparative examples of densities in much the same way as you have done for heights and green spaces.</p>	<p><i>densities in Cambridge and elsewhere.</i></p> <p><i>Verify the mapping of figures 21 and 23 which would appear to show some discrepancies.</i></p>
135	6.1 Jobs	Comment	<p>Employment Land Clearly Covid 19 is having a major impact upon employment patterns and places of work. It seems likely that some of the changes experienced during this time may lead to lasting impacts. It will be important that plans are flexible enough to cope with this changing circumstance and the changing nature of employment workspace requirements including within the home.</p>	<p><i>Ensure that plans are flexible enough to cope with the changing circumstance in relation to employment patterns and the changing nature of employment workspace requirements including within the home.</i></p>
175	Policy 15	Comment	<p>Use Classes Amend references to use classes in line with new use classes.</p>	<p><i>Amend references to Use Classes</i></p>
	Policy omission – The Historic Environment	Object	<p>Historic Environment Policy omission Whilst we appreciate that the historic environment is addressed to some degree in the design and heights policies, it is our view that the Plan would benefit from a specific policy for the historic environment.</p> <p>We fully acknowledge that there are no designated heritage assets within the site boundary. There are however heritage assets in the vicinity and, given the scale of the proposed development, there is the potential for development of this area to impact on the setting of those heritage assets. Those include assets located within the historic core of Cambridge,</p>	<p><i>Include a policy for the Historic Environment including heritage assets, the wider setting of the historic city and approach to archaeology within the site.</i></p>

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			<p>the character and appearance of the central conservation area (and in particular the eastern arm that extends along the river corridor immediately to the south of this site) and the conservation area of Fen Ditton to the east of the site, including the wider setting of the many listed buildings that lie within that conservation area. We have also been exploring with you the potential for wider impacts on assets such as Anglesey Abbey.</p> <p>In addition, there will be non-designated heritage assets including (unknown) archaeology which will need to be addressed. While we appreciate the site is largely brownfield, there may still be archaeology to be explored and addressed within the site,</p> <p>We appreciate that this Plan sits under the Cambridge City and South Cambs Local Plans and to that end can draw on the historic environment policies therein.</p> <p>However, we consider that there is also a case for a specific historic environment policy to address this particular strategic site. The policy should cover nearby heritage assets and the need to conserve and where appropriate enhance these, discuss the wider setting of the historic city and should make clear the approach to archaeology within the site (we suggest further discussion with the County Council in this regard).</p>	