

TOWN AND COUNTRY PLANNING ACT 1990 (as amended)  
Town and Country Planning (Inquiry Procedure) (England) Rules  
2000

APPENDICES  
TO PROOF OF EVIDENCE OF  
CHRISTIAN BRADY  
GREATER CAMBRIDGE SHARED PLANNING  
HERITAGE MATTERS

APPEAL BY BROOKGATE  
LAND NORTH OF CAMBRIDGE NORTH STATION

April 2023

PLANNING INSPECTORATE REFERENCE:

APP/W0530/W/23/3315611

LPA REFERENCE: 22/02771/OUT

## Contents:

Appendix A – Consultation Response to the Planning Application.....	2
Appendix B – Extracts: Riverside & Stourbridge Common Conservation Area Appraisal .....	7
Appendix C – Extracts: Fen Ditton Common Conservation Area Appraisal .....	10
Appendix D – NEC AAP policy 9. Density, heights, scale & massing.....	13
Appendix E – Harmometer.....	12
Summary - .....	14

## Appendix A – Consultation Response

### Historic Environment

#### Conservation Officer's Consultation Response

Reference Number:	22/02771/OUT
Proposal:	<p>a) An outline application (all matters reserved apart from access and landscaping) for the construction of: three new residential blocks.....etc</p> <p>b) b) A full application for the construction of three commercial buildings for Use Classes E(g) i (offices) ii (research and development), providing flexible Class E and Class F uses.....etc</p>
Site Address:	Land North of Cambridge North Station Milton Avenue Cambridge
Case Officer:	F Bradley
Responding Officer:	C Brady
Date:	Oct 2022

#### Comments:

##### The Heritage Assets

There are no heritage assets on the site itself but close to it, the Riverside & Stourbridge Common Conservation Area (City of Cambridge) and Fen Ditton Conservation Area (SCDC) are affected as is the Listed building called The Biggin. My comments relate to these heritage assets but begin with a short extract immediately below about the broader relationship to the City.

##### The Significance of the key Heritage Assets

Cambridge Local Plan 2018 Section Seven: *Protecting and enhancing the character of Cambridge*

7.1 An essential aspect of Cambridge's attractiveness as a place to live, work, study and visit is its character. This character stems from the interplay between its rich architecture and the spaces between buildings. Trees and high quality public realm also play a significant role. The interface between the urban edge and the countryside is a key component of how the city is appreciated in the landscape and contributes to the quality of life and place.  
(My underlining)

##### Riverside & Stourbridge Common Conservation Area

There is a conservation area appraisal. The area covered by this Appraisal is the stretch of the River Cam from Victoria Bridge north-eastwards to the City boundary.

It comprises the river frontages and towpaths and the adjacent meadows (including Midsummer and Stourbridge Commons); the 'Brunswick area', north of Maid's Causeway and the north side of Newmarket Road towards the Leper Chapel and the former Barnwell Junction.

The boundary includes land either side of the railway river crossing ie Stourbridge Common and the western Ditton Meadows. These are two of the three large open spaces deemed in the conservation area appraisal to be amongst the key characteristics of the conservation area. The river corridor forms the Northern boundary here.

It borders other Conservation Areas to the west, and south. On the northeast side, beyond the City boundary, are the Bait's Bite and Fen Ditton Conservation Areas, which lie in South Cambridgeshire District.

The river, its landscape setting and its use, are central to the significance of this conservation area. The landscape becomes rural as Fen Ditton is approached. A backcloth of trees surrounds the open commons, softening and at times hiding the built-up areas beyond.

#### Fen Ditton Conservation Area

The conservation area appraisal comments:

3.2 The village has an unmistakably rural feel with its grass verges, large trees and its bucolic riverside setting. The riverside spaces are all open areas of grassland interspersed with very few buildings and some houseboats. This creates a very definite edge to the village and approaching from the west, the Church of St Mary the Virgin and the Old Rectory rise magnificently above the water meadows from behind a canopy of mature trees.

3.5 The village has two distinct character areas - Green End (the site of the original settlement) which stretched along the river between The Biggin and the church, and the expanded Medieval village which runs from High Ditch Road to the church.

4.3 The original settlement at Fen Ditton was principally a strip that ran parallel to the river, with Biggin Abbey at the north and the church at the extreme southern end.

The role of the river and setting is also commented on at:

5.4 Attractive water meadows lie between the village and the river and these, combined with the surrounding fields serve visually to separate the village from the city. This separation is enhanced by the boundary of the River Cam and the fields on the west bank.

Vistas across the river (eg from the footpath running between Green End toward Bait's Bite Lock) towards the West are a feature noted on the appraisal map.

### The Biggin (Listed grade II\*)

This highly graded, nationally designated, farmhouse of the late C14 - C17 is a surviving part of the residence of the Bishops of Ely and was once moated. It lies in a largely rural open landscape and consequently, this setting adds considerably to its character. This is appreciated in views from for instance, the footpath between Horningsea Road and Baits Bite Lock.

### **The Proposals Impact on Heritage Assets and their settings.**

These comments relate to the Eastern side of the site which will be more openly apparent from distances and “natural” landscapes.

The descriptions above highlight the importance of the relationship between these areas and the river corridor, open space and views of meadows and fenland and views across these as components of the significance of the various heritage assets and their settings in the landscape.

Though the impacts affect a limited number of views or vistas from or around these assets, *the components affected are of fundamental importance to their character. For this reason, the degree of change involved – even if limited, has the potential to be of significant impact on the perception of these heritage assets as sitting within a non-urban landscape.*

The existing hotel building and the nearby office building under construction already demonstrate how such buildings intrude on the settings of the heritage assets. However, the proposed development would form a further urbanising element via intensification of the urban backdrop.

The proposed applications building heights and unfavourable comparison with those indicated by the AAP have been set out in for instance, the GCSP Landscape Officer’s response with reference to the submitted Parameter Plan 6 – Building Heights Plan.

That the promoted development of the NECAAP would also be visible from viewpoints is recognised in the NEC HIA which seeks to mitigate the effect. Such mitigation would clearly be less successful with taller buildings or buildings more consistently rising to maxima (such as those the subject of the current application) intended to be exceptions - not all the buildings can be landmarks. Where building height is exacerbated by the massing of numbers of buildings of height together, impacts will be greater. There may be additional visual impact from these being lit during darkness.

### **Mitigation**

The visual impact of the height, mass and bulk of buildings on the surrounding landscape, especially when viewed from Fen Ditton CA. Buildings S6 and S7 are two large buildings creating a near continuous roofscape of similar height. These adverse effects will not be effectively mitigated.

The proposed buildings looming up behind the eastern edge buildings will tend to negate the impact of the limited setbacks / height changes etc that have been incorporated to try to minimise the prominence of these track-side blocks.

I note that despite the application for the eastern edge buildings being a full application, the elevations for buildings S6 and 7 the drawings are indicated to be “illustrative” which presumably applies to the materials and palette as well as elevational treatment.

### **Conclusion**

The effects on Fen Ditton and Riverside & Stourbridge Common Conservation Areas would be on the important riverside setting of these conservation areas. The proposals would generate increased visibility and presence of urbanising elements of development within of the conservation areas and would affect the experience of their rural character. The intensification of development would affect the riverside setting which is a fundamental characteristic of the Conservation Areas and sensitive to change. Therefore, additional negative impact ought to be assigned considerable weight.

This leads to the view that the proposals result in more than a very minor detrimental alteration to the rural setting of the Fen Ditton and Riverside & Stourbridge Common Conservation Areas which affects their significance because the appreciation of the relationship between these areas and the river corridor, open space and views of meadows and fenland is affected. Whilst this is considered to result in “less than substantial harm”, I consider this to be at a moderate level ie a higher level of harm than the “very lowest end of this scale” suggested with the application.

Harm already done to heritage assets does not provide any justification for these proposals. There is no basis in local or national policy for accepting harmful impacts on heritage assets because a lesser level of harm has already been done.

### **Policy & NPPF**

With regards to the local planning policy, development needs to meet the criteria within the South Cambridgeshire district Council’s Local Plan (2018) policy NH/14: Heritage Assets. I consider that the proposals do not “sustain and enhance” nor “respond to local heritage character” as required by this policy.

Referencing the Cambridge City Local Plan:

Policy 61: Conservation and enhancement of Cambridge’s historic environment

To ensure the conservation and enhancement of Cambridge’s historic environment, proposals should:

a. preserve or enhance the significance of the heritage assets of the city, their setting and the wider townscape, including views into, within and out of conservation areas; etc.

I consider that the proposals do not meet the requirements of this policy.

NPPF

“Harm” to a heritage asset can include that from development within its setting (NPPF para 200).

I consider that paragraph 202 applies ie that the development proposal will lead to “less than substantial harm” at a moderate level of this scale, to the significance of designated heritage assets / their settings (and this harm should be weighed against the public benefits of the proposal).

End.

## Appendix B

**Riverside & Stourbridge Common Conservation Area Appraisal – Extracts from the Appraisal that describe the relationship with the River setting.**

### 1.3 Location

The area covered by this Appraisal is the stretch of the River Cam from Victoria Bridge north-eastwards to the City boundary. It comprises the river frontages and towpaths and the adjacent meadows (including Midsummer and Stourbridge Commons); the 'Brunswick area', north of Maid's Causeway and the north side of Newmarket Road towards the Leper Chapel and the former Barnwell Junction Station.

### 3.1 General Character

The Riverside and Stourbridge Common section of the Central Conservation Area comprises the River Cam flowing east from Victoria Bridge, north-eastwards to the City boundary. The river runs parallel to the former causeway and main road to Newmarket, lying to the south, with its terraced streets mostly of two or sometimes three storey gault brick houses.

Between the two are commons and open fields, except for an area north-eastwards from Elizabeth Bridge, where the terraced housing comes close to the river.

### 3.2 Landscape Setting

A backcloth of trees surrounds the open commons to the south, softening and at times hiding the built-up area beyond. Mature trees criss-cross the commons and riverside willows follow the stream. North-eastwards, the landscape becomes rural as Fen Ditton is approached through the Green Belt, yet much of it is well within the urban bounds of a City. It forms part of a green wedge, which penetrates to the heart of Cambridge – further westwards forming Jesus Green and eventually The Backs, before passing yet further beyond the City via Coe Fen and Sheep's Green to Grantchester Meadows.

Page 9 (end): The character of the river has thus



changed. It is recreational for racing boats and barges are now used for cruising or as houseboats. The towpaths provide informal recreation for the City, whilst traditional grazing takes place on the commons.

## 4 Spatial Analysis

The Riverside and Stourbridge Common Conservation Area is dominated by the three large open spaces along the River Cam: Midsummer Common with Butt Green, Stourbridge Common and Ditton Meadows. There are two urban areas. Firstly the Brunswick 'estate' just to the east of Butt Green and its continuation along Newmarket Road, forming the southern edge to Midsummer Common and, secondly the residential area east of Elizabeth Bridge to Stourbridge Common and including the area around Barnwell Junction, the Leper Chapel and the former Globe public house, and the adjacent old paper mill.

### 4.4 Boathouses on the North side of the River Cam

The stretch of the northern bank of the Cam, between Victoria and Elizabeth Bridges, is where the majority of the boathouses are situated.

## 6 Trees, Landscape and Open Spaces

The landscape of the Conservation Area is relatively flat with land rising modestly southwards on river terraces. There are three major open spaces, Midsummer Common with Butt Green, Stourbridge Common and Ditton Meadows. In that order, going west to east, they become progressively more rural.

Page 32: Midsummer Common is bounded on the south by housing and on the north by boathouses.

It is characterised by informal recreation along towpath and river.

Stourbridge Common is separated from Midsummer Common by the Riverside houses. Along with Ditton Meadows, it is more rural in character than Midsummer

Common, with well screened, low buildings on its edge.

Beyond the railway bridge, Ditton Meadows is countryside, but still accessible to the town and paths well used by cyclists and walkers. The river is close to the start of the bump races which run upstream, yet it is quieter and buildings on the north side more sparse. Beyond are views to St Mary's Church in the village of Fen Ditton and further still is open countryside and arable fields.

As well as being well used by commuters, these commons are important for recreational purposes as residents and visitors alike meander along the river towpaths.

## 7 Key Characteristics of the Conservation Area

1. The River Cam and its bridges – visually important, important for formal sport and informal recreation, important for wildlife.
2. The Conservation Area is dominated by three large open spaces, Midsummer Common with Butt Green, Stourbridge Common and Ditton Meadows.
3. A backcloth of trees surrounds the commons, softening and at times hiding the built-up area beyond.
4. The commons form part of a green wedge which penetrates the City east to west.
5. The Commons are important open spaces visually, for informal recreation and for wildlife. They bring countryside into the heart of a busy City, but there are opportunities for visual improvements to boundaries and other areas to preserve and enhance the setting of the commons.
- 6-10 re history and buildings.

## Appendix C

### Fen Ditton Conservation Area Appraisal – Extracts from the Appraisal that describe the relationship with the River setting:

Overview.

3.1 Fen Ditton is an essentially linear village which has resulted in a very narrow, serpentine form with an almost complete absence of backland development, the only exceptions being a few modern houses.

3.5 The village has two distinct character areas - Green End (the site of the original settlement) which stretched along the river between The Biggin and the church, and the expanded Medieval village which runs from High Ditch Road to the church.

4.3 The original settlement at Fen Ditton was principally a strip that ran parallel to the river, with Biggin Abbey at the north and the church at the extreme southern end. Much of the importance of Fen Ditton was due to the river traffic and wharves which were built between the River Cam and the village.

### TOWNSCAPE ANALYSIS

7.1 The water meadows that border the Cam, enclose the village's western side where they are called Longreach Meadows and form a linear open space separating Fen Ditton from the river. The space opens up at the south-western end of the Conservation Area boundary and Ditton Meadows are very important to the setting of the Hall Farm buildings. Views of moored houseboats and River Cottage are gained looking northwards, upstream.

High Street (south side)

7.3 High Street rises perceptibly from a small space at its west end adjoining the water meadows which border the Cam, towards what is now the hub of the village at the junction with Church Street, where a small obelisk shaped war memorial sits on a triangular grass island.

Ditton Hall is Grade II\* Listed

7.7 The setting of the hall is important as it is on rising ground overlooking Ditton Meadows, apparently isolated from the village and yet ultimately connected with High Street by its substantial garden walls

7.8 At this point High Street is joined by Church Street from the northeast in the space in front of the church gate. From here High Street follows the course of the

former Fleam Dyke, running east to connect with High Ditch Road. Opposite the war memorial, Wadloes Footpath leads south to become a narrow, well treed passage that eventually connects with paths to the river. Soon after it leaves High Street there are views of the impressive gables of Ditton Hall and then some long views to the edge of Cambridge city across the fields.

#### Green End (east side)

7.59 Northwards there is a generally suburban character to the area of bungalows and houses set back from the road. Development stops at the junction with Field Lane, and Green End becomes a track running across the fields. The land rises slightly and there are pastoral views to the river, but also to the A14 trunk road and a line of pylons.

#### Green End (west side)

7.61 Returning along Green End, southwards, the road becomes metalled again at its junction with Field Lane. The first field on the west side of the road is still open grazing land, giving views to the river and beyond to the commercial development on the northern fringe of Cambridge. The Conservation Area runs to the river, and follows its course southwards.

7.67 To the south of No. 19, a well treed track leads down to the riverside area which adjoins the extensive grounds of the Plough Inn. There are various pleasure-craft and some houseboats moored in this area, and the area has an informal yet working air to it, a reminder of when the river played a central role in village life. Looking back to the rear elevations of the houses in Green Road, their raised position on the north-south bluff becomes far more apparent.

7.68 The Plough Inn, in contrast, is sited below the road level, and relates more to the river. .... From some points on the roadway there are views over the site to the northern fringe of Cambridge on the west side of the river.

8.1 Scale: A mix of scales co-exist e.g. higher Victorian two storeys next to single storey. Only the grander buildings such as St Mary Virgin Church, Ditton Hall and The Old Rectory rise to 2½ storeys.

## Appendix D – Harmometer



## Appendix E – NEC AAP Policy 9: Density, heights, scale and massing

Development proposals should be of an appropriate height, scale and massing in order to create distinctive high-quality buildings which make a positive contribution to the existing and emerging context when considered from immediate, mid-range and long-range views. **Taller buildings**, and those in prominent locations, should respond appropriately and sensitively to the local setting, **add to the attractiveness and interest of the skyline and landscape**, **and be responsive to the historic wider setting of the City and related heritage assets.**

Development proposals should adhere to the maximum building heights identified on Figure 22. The identified heights allow for localised increases in height in specific locations across North East Cambridge to help define key centres of activity within the area and help with wayfinding. Any proposals that seek to create tall buildings (as defined below) by virtue of overall height or massing or a combination of will need to follow the assessment criteria and process identified in the Cambridge Local Plan (2018) Appendix F or successor.

Where applicable, the net residential development densities shown on Figure 24 should be used to inform schemes coming forward. Broadly, densities will increase around highly accessible parts of the Area Action Plan area, such as the District Centre, through the intensification of appropriate uses and well-designed building forms.

All proposals will be assessed against Appendix F of the Cambridge Local Plan (or successor) as well as the following criteria:

- a) Location, setting and context – applicants will need to assess the impact of their development proposals on the historic environment (heritage assets or other sensitive receptors), key views and landscape setting as well as existing and emerging townscape at North East Cambridge and its surroundings. Development proposals must clearly demonstrate that they do not negatively impact on the character of Cambridge, as a city of spires and towers emerging above the established tree line.
- b) Exemplary design – using scaled drawings, sections, accurate visual representations and models, applicants will need to demonstrate that the scale, massing, architectural quality, detailing and materials of proposals create elegant and well-proportioned buildings that create well-articulated, finer grain and human scale development forms. In the case of taller structures, proposals should also ensure good separation between adjacent buildings, to create well-articulated additions to the Cambridge skyline.
- c) Amenity and microclimate – applicants will need to demonstrate that there are no adverse impacts created by their proposals, including cumulative impacts, on neighbouring buildings and open spaces in terms of the diversion of wind, overlooking or overshadowing, glare and that there is adequate sunlight and daylight within and around the proposals.
- d) Public realm – applicants will need to show how the space around buildings will be detailed, including how a human scale is created at street level.
- e) Airport Safeguarding Assessment - where required, this assessment will be needed to understand the implications of buildings over 15m) on the operational requirements of Cambridge Airport.

## Summary

### **Proof of Evidence of Christian Brady Greater Cambridge Shared Planning**

APPEAL: LAND NORTH OF CAMBRIDGE NORTH STATION  
PLANNING INSPECTORATE REFERENCE: APP/W0530/W/23/3315611  
LPA REFERENCE: 22/02771/OUT

I am the Historic Environment Team Leader for Greater Cambridge Planning Service and have many years' experience working as a Local Authority Conservation Officer.

I became involved in the case from pre-application through to providing the GCSP Heritage response to the full / Outline application.

My evidence focuses on Reason for Refusal 2 – Impact on heritage assets. The evidence I have prepared shows why the proposals are considered by the Council to be harmful to the setting of the Fen Ditton and the Riverside & Stourbridge Common Conservation Areas.

At section 6, I refer to relevant legislation, heritage policy and guidance in the context of which a decision on this appeal must be made.

I outline the significance of the Conservation Areas and their setting in section 7 and note the influence the site and its development would have on setting.

At section 8 my proof then goes on to assess the impact of the proposed development on the significance of the Heritage Assets and their setting. This would be a harmful impact due to the scale and massing of the buildings proposed. The significance of the assets is such that the level of harm should be assessed as greater than a low level of harm.

in the following section 9, I comment on the effectiveness of the mitigation proposals

Finally, in section 10 I conclude that in the terminology of the National Planning Policy Framework, the proposals would result in a moderate level of “less than substantial harm” and that the appeal scheme is contrary to South Cambridgeshire Local Plan policies NH/14 and HQ/1, the NPPF and principle C2 ‘Value heritage, local history and culture’ of the National Design Guide.