

Called-in Planning Application, PIN reference APP/Q0505/V/25/3360616

RAILPEN LTD

Steven Handforth, Msc, IHBC

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BIDWELLS

HERITAGE PROOF OF EVIDENCE STEVEN HANDFORTH MSC, IHBC

1.0 Introduction

Witness

- 1.1 I am Steven Handforth BA (Hons), MSc, IHBC. I have a Master's degree in Historic Building Conservation with distinction, and I am a full member of the Institute of Historic Building Conservation. I currently run my own heritage practice having worked previously for over sixteen years' in the public, private and charity sectors. I have direct experience of working as a conservation officer, having previously worked at Walsall Council and Westminster City Council. I have extensive experience of providing heritage advice in the historic environment and have acted as an expert witness at many Hearings and Inquiries.
- 1.2 I have undertaken numerous significance and impact assessments where I have analysed the impacts new developments will have on the historic environment. This work includes dealing with physical impacts, setting, townscape and view assessments. I have worked on various schemes across the south-east, including sites within Dacorum, Braintree, Croydon, Westminster, Bexleyheath, Epsom and Ewell. Many of the projects I am involved in include complex heritage issues that require a detailed understanding of the significance of a place to inform its capacity for change without harming its core values.
- 1.3 Some examples of projects I have been involved in and helped gained planning permission for include:
- 2, 4, 6, 8 Danson Road, Bexleyheath: Construction of new 70 bedroom nursing home in the setting of a grade II listed Registered Park and Garden;
 - Woodcote Grove, Epsom: New residential development in the Chalk Lane Conservation Area, adjacent to the Grade II* Mansion and Grade II listed stable block;
 - 160-164 Hurlingham Road, Hammersmith and Fulham: Demolition and reconfiguration of a locally listed stable block for a part 5, part 4 and part 2 storey building providing office and flexible retail/cafe floorspace;
 - 268-282 Vauxhall Bridge Road, Westminster: The demolition of 19th and 20th century historic buildings and construction of a new hotel comprising 137 keys and replacement housing, adjacent to the setting of the Westminster Cathedral Conservation Area;
 - 1-7 Foxley Lane, Purley: Provision of 39 new units in the setting of a Grade II listed library;
 - Berkhamsted School: The provision of a new Sixth form centre to Berkhamsted School, requiring the demolition of positive buildings in a conservation area adjacent to the Grade I listed school house; and
 - 132 Station Road, Haringey: Construction of six new dwellings in a highly sensitive location within the Wood Green Conservation Area.
- 1.4 My statement provides an assessment of the identified heritage assets in accordance with the requirements of the National Planning Policy Framework. My evidence then provides an analysis of the potential impacts of the scheme and a critique of the Council's reasons for refusal and officer's report.

Statement of Truth

- 1.5 The evidence which I have prepared and provide for this application (reference APP/Q0505/V/25/3360616) in this Proof of Evidence (PoE) is true and has been prepared and is given in accordance with the guidance of my professional institution. I confirm that the opinions expressed are my true and professional opinions.



Scope of Evidence

- 1.6 I am instructed by the applicant, Railpen, in respect of the proposed redevelopment of the Beehive Centre ("the Application Site").
- 1.7 My Proof of Evidence is submitted in response to an application (ref: 23/03204/OUT) for

Outline application (with all matters reserved) for the demolition of existing buildings and structures and redevelopment of the site for a new local centre (E (a-f), F1(b-f), F2(b,d)), open space and employment (office and laboratory) floorspace (E(g)(i)(ii) to the ground floor and employment floorspace (office and laboratory) (E(g)(i)(ii) to the upper floors, along with supporting infrastructure, including pedestrian and cycle routes, vehicular access, car and cycle parking, servicing areas, landscaping and utilities. (The Development is the subject of an Environmental Impact Assessment)

being called in by the Secretary of State.

- 1.8 A detailed Heritage Statement (HS) (Bidwells; CD2.40a-d) was prepared in August 2024 and submitted as part of the original application. The Heritage Statement, which focused on above-ground built heritage only, contained a detailed appraisal of the Site, an assessment of the heritage significance of the development currently on the Site, and an assessment of the impact of the proposed development on such significance.
- 1.9 My Proof of Evidence considers the content and findings of the Heritage Statement and deals with the heritage issues raised in the consideration of the planning application in the context of national and local policies.
- 1.10 The remainder of my evidence is structured as follows:

Section 2: Sets out the background to my proof.

Section 3: Identifies the relevant policy and guidance that I apply in reaching my conclusions.

Section 4: Identifies the relevant built heritage assets that may be affected by the proposals

Section 5: Provides an assessment of the impact of the proposals.

Section 6: Provides my summary and conclusions.

2.0 Background

The Application Scheme (LPA ref: 23/03204/OUT)

- 2.1 The Application scheme went to the Cambridge City Planning Committee in February 2025 with a recommendation for refusal on daylight and sunlight. Following this meeting the putative Reason for Refusal from Committee was as follows:

By virtue of the scale, massing, and positioning of the maximum building parameters, the proposed development fails to keep potential reductions in daylight and sunlight to a minimum in St Matthew's Gardens, Silverwood Close and other adjacent properties and gardens. The extent and degree of harm would be both wide ranging, significantly adverse and acutely felt by existing occupants. Many habitable rooms would feel poorly lit, colder, and gloomier, particularly where living rooms are concerned. Multiple gardens would also feel less pleasant and enjoyable, due to the significant increase in overshadowing that would be experienced. Moreover, the proposed development would be overly dominant and imposing on neighbouring properties, particularly in St Matthew's Gardens and Silverwood Close, resulting in an oppressively enclosed outlook. The overall harm to residential amenity would be significantly adverse and permanent, contrary to policies 55, 56, 57 and 60 of the Cambridge Local Plan (2018) and paragraph 135 (f) of the National Planning Policy Framework (2024).

- 2.2 The heritage team at the council identified harmful impacts to numerous heritage assets through changes to their settings as a consequence of the proposed development. Heritage however, was not considered as a putative Reason for Refusal due to the planning benefits of the scheme outweighing any harm caused. The Application scheme was called in by the Secretary of State (SoS) on 12th February 2025.

The matters the SoS wishes to be informed about are:

- a) The extent to which the proposed development is consistent with Government policies for Building a strong, competitive economy in NPPF (NPPF Chapter 6);
- b) The extent to which the proposed development is consistent with Government policies for Ensuring the vitality of town centres in NPPF (NPPF Chapter 7);
- c) The extent to which the proposed development is consistent with Government policies for Achieving well-designed places in NPPF (NPPF Chapter 12);
- d) The extent to which the proposed development is consistent with the development plan for the area; and
- e) any other matters the Inspector considers relevant.

- 2.3 This Proof of Evidence deals with built heritage and seeks to help inform the SoS in respect to matters d and e above.

The Application Site

- 2.4 The Application Site is located to the east of the historic core of Cambridge adjacent to the railway line. This area was still in use as fields, known as East or Barnwell Field, up until 1807, when the Enclosure Act occurred and much of the common field was bought by the University and colleges.
- 2.5 For much of the site's history, the land and wider area was open fields on the edge of the city. Development of the area only really commenced following the construction of the railway in 1845.
- 2.6 The tithe entry for the site states that, in the mid-19th century, it was owned by Corpus Christi College, who appear to have occupied the majority of the area, although some small strips of land were rented to local farmers.
- 2.7 The introduction of the Eastern Counties railway line encouraged the development of the surrounding area in the mid-19th century. The site, however, remained in agricultural use into the 20th century.
- 2.8 By the 1950s, some development had begun to be erected on and adjacent to the site including Silverwood Close to the north-west of the site. Much of the site itself remained as open space although some railway sidings had been constructed in the north and a large structure had been built in the south-west corner, accessed from Sleaford Street.
- 2.9 In the late 1960s, the Co-op supermarket chain had been given permission to build a discount warehouse on the site to enable its customers to shop somewhere that was easy to park. This new building was known as Beehive 1.
- 2.10 The OS map of 1970 (figure 4- Appendix 1) shows the Co-op warehouse in the north of the site. The map also shows that the south of the site had been further developed in the mid-20th century. Here, the site was occupied by builders' yards, warehouses, a factory, a dairy, and a bakery. Outside of the site boundaries, an instrument works had been established to the west of Silverwood Close.
- 2.11 During the 1980s and 1990s, further retail units were added to the Beehive Centre and the site gradually became an out-of-town retail park. The site has been in its current form since at least the late 1990s. The former instrument works located to the north-west of the site was redeveloped in 2001-2006 under application C/01/0257. It is now the St Matthew's Gardens residential estate.

3.0 Heritage Legislation, Policy and Guidance

Legislation

- 3.1 The site does not contain, or physically impact, any listed buildings/structures, nor is it within a conservation area. As such, only Section 66(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990 is relevant to this application in that it states that development should have “special regard to the desirability of preserving the building or its setting”.

National Planning Policy Framework

- 3.2 The revised National Planning Policy Framework (NPPF) was published in December 2024.

Designated heritage assets

- 3.3 Paragraphs 207-219 contain policies for addressing potential impacts on designated heritage assets (such as listed buildings and conservation areas). Paragraphs 214 and 215 discuss different levels of harm caused to heritage assets and require a balance to be applied in the context of heritage assets, including the recognition of potential benefits accruing from a development.

Non-designated heritage assets

- 3.4 In the case of non-designated heritage assets, paragraph 216 requires a local planning authority to make a *balanced judgement* having regard to the scale of any harm or loss and the significance of the heritage asset.
- 3.5 This approach to the balancing of material issues emphasises the need for there to be a robust assessment of the relative significance of a non-designated asset, such that the resultant impact can be understood in the context of that significance.
- 3.6 There are no other statutory or national policy ‘tests’ that relate to the impact of development on non-designated heritage assets: the planning balance is to be made with reference to paragraph 216.

Planning Practice Guidance

- 3.7 The Planning Practice Guidance (PPG) has a chapter entitled ‘Historic environment’, the latest version of which was published on July 23rd 2019. The PPG provides more detailed guidance on the policies in the NPPF.
- 3.8 In respect of heritage decision-making, the PPG stresses the importance of determining applications on the basis of significance and explains how the tests of harm and impact within the NPPF are to be interpreted. In relation to non-designated heritage assets, the PPG is specific about the place of non-designated heritage assets in the planning process. Notably, the second paragraph (Paragraph: 039 Reference ID: 18a-039-20190723), added in the 2019 revision, provides further clarity on the need for selectivity when identifying non-designated assets and that only a “minority” of buildings hold sufficient interest to warrant the identification.

Local Policy

Cambridge City Council Local Plan

- 3.9 The Cambridge Local Plan sets out the City Council's policies to guide development and land use within the city up to 2031. The document was formally adopted on 18th October 2018. The heritage related policies which are relevant to this project are:

Policy 60: Tall buildings and the skyline in Cambridge

Any proposal for a structure that breaks the existing skyline and/or is significantly taller than the surrounding built form will be considered against the following criteria:

b. impact on the historic environment – applicants should demonstrate and quantify the potential harm of proposals to the significance of heritage assets or other sensitive receptors (view of, backdrop and setting), assessed on a site-by-site basis but including impact on key landmarks and viewpoints, as well as from the main streets, bridges and open spaces in the city centre and from the main historic approaches, including road and river, to the historic core. Tall building proposals must ensure that the character or appearance of Cambridge, as a city of spires and towers emerging above the established tree line, remains dominant from relevant viewpoints as set out in Appendix F;

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;

b. retain buildings and spaces, the loss of which would cause harm to the character or appearance of the conservation area;

c. be of an appropriate scale, form, height, massing, alignment and detailed design which will contribute to local distinctiveness, complement the built form and scale of heritage assets and respect the character, appearance and setting of the locality;

d. demonstrate a clear understanding of the significance of the asset and of the wider context in which the heritage asset sits, alongside assessment of the potential impact of the development on the heritage asset and its context; and

e. provide clear justification for any works that would lead to harm or substantial harm to a heritage asset yet be of substantial public benefit, through detailed analysis of the asset and the proposal.

Policy 62: Local Heritage Assets

The Council will actively seek the retention of local heritage assets, including buildings, structures, features and gardens of local interest as detailed in the Council's local list and as assessed against the criteria set out in Appendix G of the plan.

Where permission is required, proposals will be permitted where they retain the significance, appearance, character or setting of a local heritage asset.

Where an application for any works would lead to harm or substantial harm to a non-designated heritage asset, a balanced judgement will be made having regard to the scale of any harm or loss and the significance of the heritage asset.

Relevant Case Law/Call in Applications

- 3.10 The conclusions of the **Barnwell Manor** judgment (Barnwell Manor Wind Energy Ltd v (1) East Northamptonshire DC & Others [2014] EW Civ 137) demonstrates that the provisions of section 66 should be granted “considerable importance and weight” in planning judgements. However, the findings continued that “the SoS should still take account of the actual severity of any change, or scale of change as the Mayoral SPG puts it, and so the extent of impact, as well as the relevance to its significance, and the importance of the asset.” The findings of the Barnwell Manor case were reinforced by the judgements of the Forge Field (Forge Field Society & Others v Sevenoaks DC & Interested Parties [2014] EWHC).
- 3.11 **South Lakeland DC v Secretary of State for the Environment [1992] 2 WLR 204** establishes that the requirement for preservation does not result in a presumption against any change within an area. Rather, the requirement for the preservation of an area’s character and appearance can be met through a development which does not result in any harm.
- 3.12 In **R (Palmer) v Herefordshire Council ([2016] EWCA Civ 1061)**, Lord Justice Lewison concluded that “the decision maker may legitimately conclude that although each of the effects has an impact, taken together there is no overall adverse effect”. This approach was confirmed in **City & Country Bramshill Ltd v Secretary of State for Housing, Communities and Local Government & Ors [2021] EWCA Civ 320** where an internal heritage balance was carried out where elements of heritage harm and benefit are first weighed up to establish whether there is any overall heritage harm. Therefore, a development can have both positive and negative impacts upon a heritage asset, as well as neutral impacts.
- 3.13 In the **Edith Summerskill House** application, which was called in by the Secretary of State (APP/H5390/V/21/3277137), the process of assessing impacts on setting was set and highlighted that unless the asset concerned derives a major proportion of its significance from its setting, then it is very difficult to see how an impact on its setting can advance a long way along the scale towards substantial harm to significance.

Guidance

- 3.14 The following guidance is relevant to this Application:
- Historic England, ‘The Setting of Heritage Assets’ – Historic Environment Good Practice Advice Planning Note 3 (GPA 3) (2017)
 - Historic England, ‘Conservation Principles: Policies and Guidance’ (2008)
 - Historic England, ‘Managing Significance in Decision Taking in the Historic Environment’, Historic Environment Good Practice Advice (GPA) in Planning (Note 2) (2015)
 - Historic England ‘Local Heritage Listing: Identifying and Conserving Local Heritage’, Historic England Advice Note 7 (2nd edition, 2021)
 - Historic England, ‘Statements of Heritage Significance: Analysing Significance in Heritage Assets’, Historic England Advice Note 12 (2019).

- 3.15 In terms of approach to identifying the heritage assets and potential effects, Historic England's GPA3 guidance is the most helpful. This states:
- Historic England recommends the following broad approach to assessment, undertaken as a series of steps that apply proportionately to the complexity of the case, from straightforward to complex:*
- Step 1: Identify which heritage assets and their settings are affected*
- Step 2: Assess the degree to which these settings make a contribution to the significance of the heritage asset(s) or allow significance to be appreciated*
- Step 3: Assess the effects of the proposed development, whether beneficial or harmful, on that significance or on the ability to appreciate it*
- Step 4: Explore ways to maximise enhancement and avoid or minimise harm*
- Step 5: Make and document the decision and monitor outcome.*
- 3.16 I have undertaken this approach to my proof.

4.0 Identification of Assets

Agreed Assets affected

4.1 Following an assessment of all the identified assets and the proposals it has been agreed with the Local Planning Authority (LPA) that the following assets are affected by the proposals:

- Mill Road Conservation Area
- Christ Church – Grade II
- Jesus College – Grade I
- All Saints Church – Grade I
- Castle and Victoria Road Conservation Area
- Central Conservation Area

Assessment of Agreed Assets

4.2 Below is a summary of the significance of the above assets as well as the contribution the site, in its current form, makes to their settings.

ASSET	SUMMARY OF SIGNIFICANCE	CONTRIBUTION OF SETTING	CONTRIBUTION OF SITE TO SETTING
Mill Road Conservation Area	The built form of the area is predominantly laid out on an almost grid like-street pattern. Many of the buildings area are terraced, two storey houses built between the late 19th century and the early 20th century. This creates a consistent and horizontal feeling to the area. They tend to be positioned directly on or very near to the back of the pavement, resulting in an enclosed, small-scale urban character which creates a funnelled and inward facing focus to the streetscape. The primary material palette is yellow or white gault brick with some details picked out in red brick. Rooflines generally run parallel to the highways and tend to be slated. Within the consistent runs	The setting is formed by the wider city of Cambridge providing a strong context for the conservation area. There are elements of this setting, particularly the industrial/commercial sites, which do not positively add to this and are adverse in their impact. However, when taken overall, the setting is considered to make an overall positive contribution to the significance of the conservation area.	The site is located to the west of the St Matthew's part of the conservation area. In most instances, there is no awareness of the site in its current form from within the asset due to the effect of intervening built form and street enclosure. However, the south-west parts of the site are located directly adjacent to the designation's boundary. Here, the commercial character and use contrast with the residential character of the conservation area. In addition, the orientation of the buildings on site, particularly in the south-west corner where service yards dominate, results in the site turning its back on the conservation area, feeling very separate and unwelcoming when viewed

	of terraces there are other buildings, all in differing uses, which give the streetscape some punctuation and provide views/focal points along streets. There are also examples of modern infill development within the area. The conservation area is set within a very urban context with Victorian and 20th century buildings lining the surrounding roads. There are numerous examples where development is seen above the rooflines of the terraces. The conservation area is a neatly-detailed, consistent and well-preserved example of a late-Victorian suburb. This suburb is set within an ever-evolving urban context. Overall, the conservation area is considered to hold a good level of significance.		or approached from the asset. The buildings on the site are of their time and of no architectural merit. As such, the site in its existing form is considered to form an overall adverse aspect of the Mill Road Conservation Area's setting.
Christ Church	Evidence shows the church dates to the 19th century. The aesthetic value of the church rests in its Tudor Revival style and construction materials. The craftsmanship of the building is of high quality and raises the architectural and aesthetic values. Of particular note, are the turrets with domical ogee caps at each corner, referencing the roof line of King's College Chapel. Attractive views of the building can be gained along Newmarket Road as well as wider views from Castle Mound. The building has a distinctive architectural character and retains its authenticity as a	The setting of the church is formed by the church grounds in which it sits and its connection with the surrounding residential streets. This creates a clear context for the church which is beneficial to its understanding. Beyond this is the wider historic city which strengthens this context. Although there are elements of this setting which make a neutral or adverse contribution, for example the Grafton Centre, the overall setting is considered to make an overall positive contribution to the significance of the building.	The site is circa 610m southeast of the church. As a result of the low scale nature of the site, there is a limited awareness of it in views to from and across the church. Therefore, in its current form, the site is considered to make a neutral contribution to the setting of the asset.

	place of worship in the community. As a result of this illustrative, associative and communal value, the overall historic value of the church is considered to be good.		
Jesus College	Jesus College is comprised of a range of Grade I and II listed buildings. The chapel is the oldest part of the college buildings, dating from the 12th and 13th centuries. It was almost entirely refaced in the 19th and 20th centuries and was restored by A.W.N. Pugin in 1846-9. The building demonstrates its history and evolution in the materials of its construction. These materials possess high aesthetic merit and show detailing and features of interest from a number of centuries. Views of the building can be gained along Jesus Lane, but it is the wider views, in particular Castle Mound, which place the building within its historic context as part of the City. In this view, the Chapel tower does not rise significantly within the skyline due to its relatively lower height (when compared to All Saints Church for example) but does form part of the incidental examples of towers and spires which can be seen from this vantage point. The chapel has a significant level of historic and communal value particularly as a result of its intrinsic connection with the development and prominence of Cambridge as an important city within England. The chapel is	The setting of the chapel is formed by its immediate grounds and built form of Jesus College. The extended setting is formed by the wider city which provides a clear context for the college buildings. This setting is considered to make an overall positive contribution to the significance of the building although it is noted that there are elements within this, particularly the wider setting, which make an adverse contribution.	The site is <i>circa</i> 1.26km south-east of the chapel. Due to distance and intervening built form between the two, there is no direct relationship between the site and Jesus College. In wider views, where the college is seen in the context of the site, as a result of the low scale nature, there is a limited awareness of it in these views. In its current form, the site is considered to make a neutral contribution to the setting of the asset.

	therefore considered to hold a very high level of significance.		
All Saints Church	All Saints Church was designed by G F Bodley and was built 1863-1870. It is built of brick faced with ashlar and has tiled roofs. The church is decorated in an early 14th century Decorated style. The tower is an important Cambridge landmark and one of the tallest structures in the city and is visible in key views such as from Castle Mound. The design of the tower is based on St Oswald's Church, Ashbourne, Derbyshire, and has a projecting north-east stair turret with an external doorway. There is an embattled parapet at the top of the tower and rising from it a tall broach spire. The church has a significant connection with the history and development of the City. The church is a distinctive built feature which performs a prominent role in the environment of people living nearby, and strong spiritual role alongside. The longevity and quality of the structure provides an authenticity and connection with the past which creates a strong image for local communities and within the wider area. For all these reasons, the church possesses a very high level of significance.	The setting of the church is formed by its immediate churchyard and grounds. The extended setting of the church is formed by the wider city. This combined setting makes an overall positive contribution to the significance of the building.	The site is <i>circa</i> 1.28km south-east of the church. There is no direct relationship between the site and the church due to distance and intervening built form. As a result of the low scale nature of the site in its current form, there is a limited awareness of it in views of the church spire, in particular from Castle Mound which is a key viewpoint. In its current form, the site is considered to make a neutral contribution to the setting of the asset.
Castle and Victoria Road Conservation Area	The designated area includes the 19th century residential development around Victoria Road and Chesterton Road, Histon Road cemetery, Edwardian development north-east of	The area is bounded by the Historic Core Conservation Area to the south, Storey's Way Conservation Area to the northwest, and the West	The site is located <i>circa</i> 1.56km to the south-east of the conservation area. It is a considerable distance away, approximately 1.5km, and from within most of the area it is not considered to be a

	Huntingdon Road, and the Roman settlement and site of the Norman Castle around Castle Hill. It is a predominantly urban area, with the small green space of Castle Mound having a distinct contrasting character. The area surrounding Castle Mound holds a high level of archaeological significance, being the site of the walled Roman town and the medieval castle that was re-fortified by Oliver Cromwell. The motte of the Norman castle survives and is a landmark site in the area. The conservation area is considered to hold a good level of significance.	Cambridge Conservation Area to the west. The conservation area is located in the highest part of Cambridge, the castle being positioned here due to its defensive advantage. From the top of Castle Mound there are panoramic views across the historic city. The setting is considered to make an overall positive contribution towards the significance of the conservation area.	meaningful or recognisable part of the wider setting of the conservation area. The site does feature as a minor element in certain panoramic views across the city from Castle Mound; however, due to the relatively low-lying nature of the site, it is not a prominent feature in these views. Overall, the site is considered to make a neutral contribution to the setting of the conservation area in its current form.
Central Conservation Area	At its simplest, the city can be viewed as a series of rings. The central area is the commercial core, surrounded by the colleges, university and residential buildings and beyond this are the river and open spaces. The defining topographical characteristic of central Cambridge is that it is very flat. The taller buildings, such as St John's and King's College Chapels, therefore become prominent landmarks within the cityscape. Due to its historical, evidential, cultural and aesthetic value, the significance of the Central (Historic Core) Conservation Area is considered to be high.	The setting is formed by the wider city of Cambridge. This provides a strong context for, and demonstrates the historic evolution of, the historic core. The wider setting is therefore considered to make an overall positive contribution to the setting of the conservation area overall, although there are elements within this which are considered to provide either a neutral or adverse contribution.	The site is located <i>circa</i> 910m east of the conservation area. Due to the relatively low scale nature of the site in its current form, there is little or no awareness of it in views from and across the central core of the conservation area. As such, in its current form, the site is considered to make a neutral contribution to the setting of the asset.

Disputed Assets affected

4.3 In the SoCG the LPA have identified these additional assets as being affected. This is a matter of dispute between the parties which is discussed within the next section.

- Mill Road Cemetery (Registered Park and Garden)
- Kings College Chapel - Grade I
- St Mary the Great Church - Grade I
- St John's College - Grade I
- University Library - Grade II
- Kite Conservation Area
- Riverside and Stourbridge Common Conservation Area

Assessment of Disputed Assets

4.4 Below is a summary of the significance of the above assets as well as the contribution the site, in its current form, makes to their settings.

ASSET	SUMMARY OF SIGNIFICANCE	CONTRIBUTION OF SETTING	CONTRIBUTION OF SITE TO SETTING
Mill Road Cemetery	Mill Road Cemetery is a Registered Park and Garden. It was opened by the Bishop of Ely in 1848. During the 19th century, the rapid growth of Cambridge put the city's churchyards under considerable pressure. The cemetery contains large mature trees and is an area of ecological interest. It has varied tombstones, some of which are listed, and winding pathways which create a pleasant place to walk and relax in. The Park & Garden is considered to hold a good level of significance.	The site is bounded to the north, east and south by the gardens of private houses, and to the west by the grounds of Anglia Ruskin University. The ground is level and entirely enclosed by a low brick wall, with limited views into the site from the surrounding gardens and houses due to the presence of mature boundary vegetation. The residential setting of the cemetery adds positively to its understanding and context and makes an overall positive contribution to the significance of the building.	Due to the intervening built form, there is no awareness of the site either within or across the cemetery. As such, the site in its current form is considered to make a neutral contribution to the setting of Mill Road Cemetery.
King's College Chapel	Evidence shows the building dates to the mid-15th century and retains a large number of features both internally and externally which are of significant interest, and some exceptional including the fan-vault which is the largest in Europe.	The setting of King's College Chapel is formed by its immediate context within the King's College grounds. Beyond this is the historic core of Cambridge. This setting makes an overall positive	The site is located circa 1.7km east of the chapel. Due to the relatively low scale nature of the site in its current form, there is no awareness of the site from the chapel itself. In views across the city towards the site, where King's College

	The aesthetic value of the building rest in its detail design and construction materials. The craftsmanship of the building is of substantial quality Attractive views of the building can be gained along Kings Parade as well as numerous locations around the city it has a distinctive architectural character which is replicated on other important buildings within Cambridge. It has a significant connection with the history and development of the Cambridge. The church is a distinctive built feature and is seen as an iconic symbol of Cambridge and is considered to hold a very high level of significance.	contribution to the significance of the building.	Chapel can be seen, there is also a limited awareness of the site. As such, in its current form the site is considered to make a neutral contribution to the setting of the asset.
St Mary the Great Church	The Church of St Mary the Great is Perpendicular in style with embattlements throughout, with low pitched roofs. It is constructed from rubblestone with some ashlar, with dressings of oolitic limestone. The interior is faced largely in clunch. The church is on the site of an earlier Saxon church, with the foundations dating from 1010. Following a fire in 1290, the church was rebuilt in the early 14th century and the chancel dates from this period. The rest of the church was rebuilt entirely from the late 15th century, completed in 1606. Prior to the construction of the Senate House in the mid-18th century, the church was used as an official gathering place for	The church is located in the centre of the medieval city, set at the edge of the marketplace, emphasising the historic links between the two places of gathering. It also has close links to the University, with the 18th century Senate House, where graduations take place, directly opposite, and many colleges, including King's and Trinity in close vicinity. As such the setting of the Church of St Mary the Great is considered to make an overall positive contribution to its significance.	The site is approximately 1.6km to the east of the Church of St Mary the Great. As a result of the distance and intervening built form there is a limited visual connection between the receptors. As such, it is considered that the site in its current form has a neutral contribution on the setting of the Church of St Mary the Great.

	university meetings and debates. Overall, the Church of St Mary the Great is considered to hold a very high level of significance in heritage terms. It is still in use as a place of worship and is considered to be a landmark within the city, giving it high spiritual and communal value, alongside its continued historic status as the University Church.		
St John's College	St John's College is formed by the buildings surrounding the First, Second and Third Courts. The Chapel dates to 1863-9 and is designed by Sir Gilbert Scott with a very tall nave and tower. The chapel replaced a smaller chapel which had been built as part of the original construction of the College courtyard (the First Court). The Chapel was not originally conceived as having a tower but Henry Hoare who was an alumnus of the College, offered to pay for the cost of adding this to the design. St John's College is considered to hold a very high level of significance.	The setting of St John's College is formed by its immediate grounds as well as the surrounding historic core of Cambridge. The setting provides a context and understanding of the College and is considered to make an overall positive contribution to its significance.	The site is located circa 1.65km east of the Chapel. Due to the relatively low scale nature of the site in its current form, there is no awareness of the site from the college or chapel itself. In views across the city towards the site, in particular from Castle Mound, there is also a limited awareness of the site due to this lower scale nature. As such, in its current form, the site is considered to make a neutral contribution to the setting of the asset.
University Library	The University Library was designed by Sir Giles Gilbert Scott. Construction of the library began in 1931 and was completed in 1934. The structure is faced with two-inch handmade bricks 'of a lightish Indian red' from Great Missenden, Buckinghamshire, while	The immediate setting of the library is formed by a number of surrounding College buildings set within a landscape setting. The extended setting is formed by the city of Cambridge to the east and the open fields to the west. Overall, the setting of the building make an overall	The site is located 2.3km east of the library. Due to the relatively low scale nature of the site in its current form, there is no awareness of the site from the library. In addition, in views across the library towards the core of Cambridge, there is also a very little awareness of the site. As such, in its current

	the stone used for cornices and dressings is Clipsham or Weldon. The roofs - and the top surfaces of the cornices — were laid with special small Lombardic tiles. The same, rather exotic treatment and dramatic vertical emphasis was given to the tower, 157 feet high, where, at a high level, gallery-like openings are flanked by figures at the four corners representing the Four Winds of Heaven carved by E. Carter Preston, the sculptor used by Scott at Liverpool. When considered overall, the University Library is considered to hold a good level of significance.	positive contribution towards its significance.	form, the site is considered to make a neutral contribution to the setting of the library.
Kite Conservation Area	The area is mainly residential and is based on a grid pattern of streets characterised by historic terraces in a cohesive townscape. The streets typically feature Georgian terraces of two or three storeys, built of gault brick with slate roofs. In some grander streets the houses have basements, bay windows and stone front steps. Nearly all of the houses are built on the back of the pavement or only slightly set back, and many have back gardens often containing mature trees. Most of the earliest buildings are now Grade II listed, and many others are on the City Council's list of Buildings of Local Interest. Overall, the conservation area is considered to hold a good level of significance.	East Road lies to the east of the conservation area, effectively forming a boundary (also the southern section of the Area extends across East Road to include Petersfield). It is a main traffic route and has many large-scale buildings such as the Crown Court, Anglia Ruskin University and student accommodation, a mid-20th century housing estate, and the buildings around the Grafton Centre complex. East Road therefore marks a sudden change in character when exiting the conservation area, and 'cuts off' the area from the Mill Road Conservation Area to the east, whereas historically the two areas would have been a natural continuation from one another. Despite elements of the setting of the area being considered to be negative,	The site is located circa 500m east of the conservation area and is visually and physically separated by the intervening built form of both the Grafton Centre and the Mill Road Conservation Area. As a result of this separation, the site is considered to make a neutral contribution to the setting of the asset, in its current form.

		overall the setting includes both the medieval historic core of Cambridge and significant 19 th century development, as well as several significant green spaces. Therefore, the setting overall is considered to make an overall positive contribution to the significance of the conservation area.	
Riverside and Stourbridge Common Conservation Area	The conservation area covers the stretch of the River Cam from Victoria Bridge north-eastwards to the city boundary. It comprises the river frontage and towpaths and the adjacent meadows, the north side of Maids Causeway and the north side of Newmarket Road towards the Leper Chapel. The historical development of the Riverside and Stourbridge Common area is linked to the history of Barnwell and its common fields. The conservation area is considered to hold a good level of significance.	The setting of the conservation area includes the suburbs of Chesterton to the north and Barnwell to the south-east, and Jesus Green to the west. The Kite Conservation Area and the Grafton Centre are to the south. A “backcloth of trees” surrounds the commons to the south, which softens views of the urban setting beyond. The wider setting is therefore considered to make an overall positive contribution to the setting of the conservation area overall, although there are elements within this which are considered to provide either a neutral or adverse contribution.	The site is located <i>circa</i> 340m south-east of the conservation area. The commercial character of the site contrasts with the residential nature of the area. There are a significant number of modern developments between the two resulting in limited visual interaction between the two. As such, the site is considered to be a neutral aspect of the conservation area’s setting.

- 4.5 In finalising the Heritage Assets Topic Paper requested by the Inspector, the Council indicated that it had taken third party advice from heritage consultancy Place Services in connection with this matter. In section 5 of the Topic Paper which identifies assets in dispute, the Council maintains the list of disputed assets set out above. However, in section 6 of the Topic Paper the Council appears to indicate it considers the development will harm the significance of further heritage assets as set out in the table at paragraph 6.3 of the Topic Paper.
- 4.6 It would appear that the reason for this is not linked to any heritage assessment undertaken by the Council but only to the results of the Environmental Statement. It should be noted that the conclusions of the Environmental Statement are based on tables that provide an indicative potential effect on the heritage assets’ settings and significance. The table does not allow for nuances, rather it is a binary approach. For example, there could be considerable or major change in the setting of a heritage asset that result in no impact to significance. This could be a result of that part of the setting providing no contribution to significance. The Environment

Statement table however would likely identify this as harmful, and the higher graded the asset is, the higher the harm. Whilst this approach is not uncommon for Environmental Statements, I do not use it within my heritage assessments. Historic England's GPA3 Guidance provides a much more intuitive and accurate assessment procedure which I have adopted as part of my assessment.

- 4.7 If contrary to the SoCG, the Council's expert is of the view that there is such harm to these additional heritage assets, I will address this in rebuttal. However, for the reasons set out above I believe this is an error on the part of the Council's expert in the Topic Paper. For the avoidance of doubt, I do not consider that harm is caused to the significance of the further assets set out in paragraph 6.3 of the Topic Paper.

5.0 Impacts on identified assets

Agreed Assets – differing harm levels

- 5.1 The methodology used in the Heritage Statement and in the Environmental Statement Chapter 7: Cultural Heritage has found a variety of indirect potential effects of the proposed development on the setting of heritage assets. The question in this case is where the potential effects identify less than substantial harm, where on the scale does this harm level sit.
- 5.2 It should be made clear that the aspects of harm relating to effects on setting do not directly infer impacts on significance. Whilst the setting of a heritage asset can be a fundamental contributor to its significance, it should be noted that ‘setting’ itself is not a designation. The value of setting lies in the contribution it makes to the significance of an asset.
- 5.3 Impact on setting is measured in terms of the effect that the impact has on the significance of the asset itself – rather than setting itself being considered as the asset. It is apparent that the proposals will result in a degree of ‘change’ to the setting of the assets but, in accordance with Historic England’s *The Setting of Heritage Assets – Planning Note 3*, ‘change’ does not in itself imply harm, and it can be neutral, positive or negative in effect.
- 5.4 A development can have both positive and negative impacts upon a heritage asset, as well as neutral impacts. In the *R (Palmer) v Herefordshire Council* ([2016] EWCA Civ 1061 case, Lord Justice Lewison concluded that “*the decision maker may legitimately conclude that although each of the effects has an impact, taken together there is no overall adverse effect*”. This approach was confirmed in *City & Country Bramshill Ltd v Secretary of State for Housing, Communities And Local Government & Ors* [2021] EWCA Civ 320 where an internal heritage balance was carried out where elements of heritage harm and benefit are first weighed up to establish whether there is any overall heritage harm. When assessing the impact of a proposal, whilst it is clear that heritage benefits and heritage harms do have individual impacts upon an asset’s significance, when taken together, the proposals could legitimately be considered not to have an adverse overall impact on the significance of the asset.
- 5.5 In this case, the matters in hand are a perceived harm that the increase in massing and scale of the site will have on the contribution that setting makes to the significance of each relevant heritage asset, weighed against the heritage benefits brought forward by the scheme (namely design landscape improvements to the edge of the Mill Road Conservation Area). Once this internal heritage balance has been undertaken, if there is residual heritage harm remaining, this is then weighed against the public benefits of the scheme.

Immediate setting (Mill Road Conservation Area)

- 5.6 Following a desk-based and on-site assessment the heritage asset within the immediate context of the site which is affected by the proposals is the Mill Road Conservation Area. It is agreed by both parties that the impact on this asset is ‘less than substantial’ in nature. However, it is where on the scale of less than substantial range which is disputed, with the Council finding a lower end of less than substantial harm.
- 5.7 The relevant visualisations for Mill Road Conservation Area are: **AVR 04, AVR 07, AVR 08** (Appendix 3, figures 8-10)

Table 1 - Agreed assets (immediate context) summary of impact

ASSET	TYPE	CONTRIBUTION OF SETTING SIGNIFICANCE	IMPACT ON SETTING	IMPACT ON SIGNIFICANCE	LPA IMPACT ON SIGNIFICANCE
Mill Road	Conservation Area	Positive	Negligible adverse	Lowest level of LTSH	Lower end of LTSH

- 5.8 The site is considered to make a negligible adverse contribution to the setting of the conservation area. This is as a result of the limited-quality buildings on site, which relate poorly to their context in style, materiality and orientation. The site has no frontage which faces the conservation area creating an inward-facing, shed-like development.
- 5.9 The scale of the proposals is an increase to that of the existing buildings on site however, they form part of an opportunity to comprehensively masterplan the whole site to form a development that relates more positively to its surroundings. The introduction of taller buildings within the site will result in a partial reduction in the ability to appreciate the openness above the existing low-height structures from some vantage points making it appear more prominent. It should be noted that, as one moves around the conservation area, views of the site differ and, in many cases, is not apparent.
- 5.10 The south-western boundary of the site has a more direct visual relationship with the conservation area. Here, the scheme will replace the two large industrial units located on the south-western boundary of the site with new buildings, of varying height and set behind a green buffer, and a large park. The landscaping creates a buffer between the conservation area and the proposed development and results in the proposed built form sitting further back from the York Street junction. This ensures that there is a clear spatial definition between them and the proposed built form, and the rooflines of the terraces are seen with the skyline behind them.
- 5.11 The site has historically always had a separate character to the conservation area and the wider historic core of Cambridge. It has never aesthetically integrated with it and has always been an island site on the edge of the city core.
- 5.12 Although the proposed structures will be more prominent, the massing being stepped in height helps to break down the perceived visual impact. In addition, the Design Code helps to seek a sensitive design to ensure these new elements will be less visually contrasting than the existing retail sheds and will be set within an enhanced landscape context.
- 5.13 Impact on setting is measured in terms of the effect that the impact has on the significance of the asset itself – rather than setting itself being considered as the asset. Indeed, within the Inspector's report from the appeal for Edith Summerskill House, APP/H5390/V/21/3277137, the process of assessing impacts on setting is described in paragraph 12.50 as follows:
- In cases where the impact is on the setting of a designated heritage asset, it is only the significance that asset derives from its setting that is affected. All the significance embodied in the asset itself would remain intact. In such a case, unless the asset concerned derives a major proportion of its significance from its setting, then it is very difficult to see how an impact on its setting can advance a long way along the scale towards substantial harm to significance.*
- 5.14 The significance of the conservation area is primarily found in its historic and architectural interest as a neatly-detailed, consistent and well-preserved example of a late-Victorian suburb. Whilst there will be a change to the setting of the conservation area, through the careful

consideration of the parameter plans and design code, the proposals result in significant improvement to the close-range edge treatments alongside the conservation area. The replacement of the existing buildings on site with a well-considered and high-quality range of new buildings, improved connectivity across the site and proposed landscaping greatly improves the public realm, in particular in views along Rope Walk and from the junction of York Street. Notwithstanding this, the overall increase in height immediately adjacent to the conservation area would contrast with this part of the conservation area's low-lying nature and sense of openness. On balance, it is considered to cause less than substantial harm (through a change to a small section of the area's setting), at the lowest end of the spectrum. The LPA in their Topic Paper have identified this level of harm as being at the lower end of less than substantial.

Wider setting

- 5.15 The remainder of the (agreed) assets affected are within the wider setting of the site. Their location, in relation to the site, are shown in Appendix 2. Key views of these assets showing the potential impact of the proposals can be found in Appendix 3. Table 2 below identifies the contribution that the overall setting of each asset makes to their significances alongside the potential impact the scheme will have on this along with the LPA's view.

Table 2 - Agreed assets (wider context) summary of impact

ASSET	TYPE	CONTRIBUTION OF SETTING SIGNIFICANCE	IMPACT ON SETTING	IMPACT ON SIGNIFICANCE	LPA IMPACT ON SIGNIFICANCE
Central	Conservation Area	Positive	Negligible adverse	Lowest level of LTSH	LTS – towards the middle
Castle and Victoria Road	Conservation Area	Positive	Negligible adverse	Lowest level of LTSH	LTS – lowest end
All Saints Church	Grade I	Positive	Negligible adverse	Lowest level of LTSH	LTS - moderate
Jesus College Chapel	Grade I	Positive	Negligible adverse	Lowest level of LTSH	LTS – moderate
Christ Church	Grade II	Positive	Negligible adverse	Lowest level of LTSH	LTS – lower end

- 5.16 The LPA did not originally highlight individual impacts on the assets rather they grouped them and provided an overall impact – at a moderate level. However, in the Topic Paper they have now provided individual impacts on the heritage assets. Whilst assets can in some cases be grouped for the purposes of assessment, in this instance it is not considered appropriate as the assets do not form a singular group, have varying levels of prominence/value and are read in the context of different settings.
- 5.17 As with Mill Road Conservation Area it is apparent that the proposals will result in a degree of 'change' to the setting of the assets, however when the site is seen in the context of the assets, it is seen within a wider and evolved cityscape. Below is a summary table of the impact considerations, visuals to demonstrate these are included within Appendix 3.

Table 3 - Agreed assets impact discussion

ASSET	IMPACT ON SIGNIFICANCE	IMPACT DISCUSSION
Central Conservation Area	Less than Substantial (LTS) - Lowest end of the spectrum	Most relevant visual(s): AVR01 The proposals will have an impact upon views across the Central (Historic Core) Conservation Area from Castle Mound. Views from this point look out over the Historic Core area, with landmarks being the towers of Jesus College chapel and All Saints Church. This is the primary panoramic view across Cambridge. Due to the flat topography, there are no other notable public viewpoints of the skyline, although there will be other views from the upper floors of buildings and from church towers. Because of this topography, the roofscape of Cambridge is not as varied or dramatic as some other comparable cities, and, whilst it does contain several points of high significance and interest, there are also numerous modern developments visible in the view which have eroded its historic appearance. The parameter plans and design codes have been formulated to minimise the effects of the increased height/massing considering policy 60 of the Local Plan. This includes the proposed positioning of blocks to create open corridors and visual gaps though the site which help to further break down the experience of mass. Nonetheless, the proposed development will have a negligible adverse effect on the significance of the Central (Historic Core) Conservation Area as a result of a negligible change to a minor element in the wider townscape context of the historic core. The primary reason for this being that the change to setting would only be readily appreciable from Castle Mound. The ability to appreciate and understand the asset's significance from this vantage point is limited and it is the asset's inherent fabric and immediate context that contributes most to its heritage value.
Castle and Victoria Road Conservation Area	LTS - Lowest end of the spectrum	Most relevant visual(s): AVR01 The site is located a considerable distance away from the conservation area and is not considered to be a meaningful part of its wider setting. However, the site is visible within the panoramic views across the city from Castle Mound, which lies within its boundary. The proposed scheme will result in a greater awareness of the site from within the conservation area as it will become more prominent in one part of the panoramic view from the mound – albeit that

		this view looks eastwards, away from the historic core. By introducing larger scale, modern built form to this panoramic view, there would be a degree of change to part of this view of the historic skyline of Cambridge. Acknowledging the role in this view, the scheme has been carefully considered to limit potential impacts. By means of numerous massing and visualisation testing, thorough consideration has been given to the treatment of the elevations and material tones to help to break up the mass and to create an interesting roof profile. The result ensures that harmful visual effects have been mitigated and, wherever possible, views towards the site will be of buildings of the highest design quality which do not appear unduly prominent or competitive in the distant townscape. Therefore, from this viewpoint from the Castle Mound, the proposals would be considered to have a negligible adverse effect upon the significance of the conservation area. The primary reason for this being that the change to setting would only be readily appreciable from Castle Mound. It is the asset's inherent fabric and immediate context that contributes most to its heritage value.
All Saints Church	LTS - Lowest end of the spectrum	Most relevant visual(s): AVR01, AVR10, AVR 11, AVR13 Due to its tall and distinctive spire, it is a landmark building and visible in views across Cambridge. The view of the spire from Castle Mound is a prominent feature. The site forms a minor part of the panoramic view of Cambridge in which the spire is prominently visible. The increased height of the proposed scheme will result in increased visibility of built form at the site when viewed from Castle Mound. The visual impact of the scheme has been mitigated through the careful placement of the plots, considered placement of the plant and flues, the chosen material tone/palette and by the breaking up of massing to ensure a varied roofline. All of which is secured through both the parameter plans and design codes. As a result of a degree of increased prominence in relation to this listed building, the proposed scheme will result in a small change to the setting of All Saints Church when viewed from this specific location. The scheme is, however, some distance to the east of the church, and so in views will not distract from the visual prominence of the distinctive spire within this roofscape. It will introduce additional large-scale modern built form to the wider setting which does rise in places above the horizon line. However, taking into account the

		view as a whole is understood to be part of an urban city centre and which does contain other larger modern developments. Based on my assessment, it is considered that the proposed scheme would have a negligible adverse effect on the setting and significance of All Saints Church. The primary reason for this being that the change to setting would only be readily appreciable from Castle Mound. The ability to appreciate and understand the asset's significance from this vantage point is limited and it is the asset's inherent fabric and immediate context that contributes most to its heritage value.
Jesus College	LTS - Lowest end of the spectrum	Most relevant visual(s): AVR01 The top of the tower of Jesus College chapel visible in the panoramic view over Cambridge from Castle Mound. Unlike the tower of All Saints Church to the right, the tower of Jesus College chapel does not rise above the horizon line of the city and countryside beyond. The proposed scheme will be clearly visible in views towards the site from Castle Mound but will not be located directly behind the tower and will be seen within the existing backdrop of a built-up urban area. The proposals will result in a degree of change of character to wider setting of the college through an increased awareness of additional built form in a specific view of it from this location. Overall, it is considered that the proposed scheme would have a negligible adverse effect upon the setting of Jesus College. The primary reason for this being that the change to setting would only be readily appreciable from Castle Mound. The ability to appreciate and understand the asset's significance from this vantage point is limited and it is the asset's inherent fabric and immediate context that contributes most to its heritage value.
Christ Church	LTS -Lowest end of the spectrum	Most relevant visual(s): AVR01 As a result of the location of the church, the proposed development will be seen in the background of its towers in views from Castle Mound. The roofline of the church currently stands out against the generally low-lying roofscape beyond. The proposals would add a large-scale modern building into the skyline. This impact is partially mitigated by the varied design and tonality of the roofscape, which will break down the perceived massing. Nevertheless, it is considered that the proposed scheme would have a negligible adverse effect on the wider setting of Christ Church. The primary reason for this being that the change to setting would only be readily appreciable from Castle Mound. The ability

		to appreciate and understand the asset's significance from this vantage point is limited and it is the asset's inherent fabric and immediate context that contributes most to its heritage value.
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- 5.18 The Heritage Statement submitted with the application follows a clear methodology that is sufficient to enable the potential impact of the proposals on the significance of the assets to be understood. The Heritage Statement identifies impacts ranging from negligible to minor/moderate adverse. Having reviewed this document in detail, and undertaken my own site analysis, I agree with the heritage assets identified within this report that would be likely impacted, but differ in view on the level of impact on the significance of these heritage assets.
- 5.19 I identify negligible harm to the six heritage assets identified within the Heritage Statement, whilst Bidwells identify a mixture of neutral, minor beneficial to minor adverse on the Mill Road Conservation Area, minor adverse impacts to Central Conservation Area, All Saints Church, Jesus College, moderate/minor adverse impacts to Christ Church and negligible adverse impacts to the Castle and Victoria Conservation Area.
- 5.20 The overall harm caused to the identified heritage assets would be negligible in my professional opinion as a consequence of changes to their setting. The reason for this being that the change to setting (excluding Mill Road Conservation Area) would only be readily appreciable from Castle Mound and in some other long-range views. The ability to appreciate and understand these assets' significance from these vantage points is limited and it is their inherent fabric and immediate context that contributes most to their heritage value. Change to these long-range views would still allow these assets to be appreciated (albeit to a limited degree due to their distance).
- 5.21 In terms of the position of the Council's heritage expert in the Topic Paper, whilst there are some discrepancies on where on the scale the level of harm sits, both myself and the LPA consider it to be less than substantial in nature for each of the agreed assets.

Assets not agreed to be harmed – differing harm levels

- 5.22 The additional assets which the LPA consider to be affected are also within the wider setting of the site. The location in relation to the site is shown in Appendix 2. Key views of these assets and the site (Red Meadow Hill, Worts Causeway and Lime Kiln Road) are shown in Appendix 3. Table 4 identifies the contribution that setting makes to the assets alongside the impact findings from the Heritage Statement (which I am in agreement with) and that of the Local Planning Authority's expert in the recent topic paper.

Table 4 – Disputed assets summary of impact

ASSET	TYPE	CONTRIBUTION OF SETTING SIGNIFICANCE	IMPACT ON SETTING	IMPACT ON SIGNIFICANCE	LPA IMPACT ON SIGNIFICANCE
Mill Road Cemetery	RPG	Positive	Neutral	Neutral	LTS – Lower end
Kings College Chapel	Grade I	Positive	Neutral	Neutral	LTS - Moderate

St Mary the Great	Grade I	Positive	Neutral	Neutral	LTS - Moderate
St John's College	Grade I	Positive	Neutral	Neutral	LTS - Moderate
University Library	Grade II	Positive	Neutral	Neutral	LTS - Lower end
Kite Conservation Area	Conservation Area	Positive	Neutral	Neutral	LTS - lower end
Riverside and Stourbridge Common Conservation Area	Conservation Area	Positive	Neutral	Neutral	Neutral

5.23 The LPA did not originally highlight individual impacts on the assets but provided an overall cumulative assessment of moderate adverse. However, in the Topic Paper they have now provided individual impacts on the heritage assets. Grouping of assets in this way is not always an appropriate approach however, in this instance it is agreed that some of the assets can be grouped for assessment due to their location, value and/or relationship with the site. In this instance, the assets I agree can be grouped are King's College and St Mary's as well as St John's College and University Library. The remaining assets should, however, be assessed separately as their relationship with the site varies.

5.24 As with the agreed assets, it is apparent that the proposals will result in a degree of 'change' to the setting of the assets. Below is a summary table of the impact considerations along with details of the most relevant visuals to demonstrate this.

Table 5 – Disputed assets impact discussion

ASSET	IMPACT ON SIGNIFICANCE	IMPACT DISCUSSION
Mill Road Cemetery	Neutral	Most relevant visual(s): AVR05 The proposed scheme will be visible in glimpsed views from specific points within the cemetery. Due to the inward-looking nature of the cemetery, closely-packed surrounding streets, and existing planting throughout, the scheme will not be visible from almost all points within the cemetery. Where some views may be obtained, the impact would be limited and screened by mature vegetation. The fact that the scheme is partly visible in some views is not considered to impact the significance of the park. Therefore, it is considered that the proposed scheme would have a neutral impact on the setting and significance of the cemetery.
Kings College Chapel	Neutral	Most relevant visual(s): AVR10, AVR13 In views from Red Meadow Hill, the roofline of the proposed scheme would be visible, albeit the distance of this location from the site makes it difficult to discern anything in detail. The site is not seen in the immediate

		backdrop of Kings College in any of the views and is physically and visually separate from the historic core. The site reads as a component of the wider urban context, resulting in only a minor visual change from how it currently appears. Therefore, when considered within the context of the wider and evolved setting of the building, the proposed scheme would have a neutral impact on the setting and therefore its significance.
St Mary the Great	Neutral	Most relevant visual(s): AVR10, AVR15 St Mary the Great is not a prominent feature in the skyline although it is visible from Red Meadow Hill. The proposals are both visually and physically separated from the church. They do not rise above the horizon line and do not draw the eye away from the asset. The proposals will result in a minor visual change which will have a neutral impact on both the setting and significance of the asset.
St John's College	Neutral	Most relevant visual(s): AVR10, AVR13 In the view from Red Meadow Hill, St John's College is located some distance away from the site. It is clearly separate and visually prominent. The proposed scheme in no way challenges this prominence and results in only minor visual change within its wider, and much evolved, setting. This is considered to result in a neutral impact on both the setting and significance of the asset.
University Library	Neutral	Most relevant visual(s): AVR10, AVR11, AVR13 Located in close proximity to St John's in the Red Meadow view, the university tower is the most prominent feature in this view. As with the above assets, the minor change within its wider setting is considered to result in a neutral impact on the setting and significance of the building.
Kite Conservation Area	Neutral	Most relevant visual(s): AVR10 Whilst the proposed scheme would be more visible in certain viewpoints, it would continue to appear as part of the established and varied urban backdrop and would not stand out within the roofscape of Cambridge. Therefore, whilst there may be a degree of change from current conditions, it is considered that the proposals would have a neutral impact upon the setting and significance of the conservation area.
Riverside and Stourbridge Common Conservation Area	Neutral	Most relevant visual(s): AVR06 The introduction of additional mass above the site will result in a reduction in the ability to appreciate the open skyline above it in some views from within the conservation area. These views are, at present, limited in nature and would be seen within the existing commercial character of the area to the north of the site. The varied massing of the proposed roofline will help to break up the mass of the proposed scheme which seeks to minimise the effects of the increased height and to ensure that any views obtained are towards a building of the highest design quality and visual interest.

		As a result, whilst there may be a small degree of change to the existing roofscape context in limited viewpoints, the proposed scheme is considered to have a neutral impact on the wider setting and significance of the conservation area.
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- 5.25 When considering the way in which the site relates to the above assets, it is clear that it is both physically and visually separate in key views. The parameter plans and design codes allow clarity and certainty that the development results in a minor visual change, seen within a wide and evolved context, which is not considered to impact the setting or significance of the above assets.

6.0 Conclusion and Summary of Proof

- 6.1 I am Steven Handforth BA (Hons), MSc, IHBC. I have a Master's degree in Historic Building Conservation with distinction, and I am a full member of the Institute of Historic Building Conservation. I currently run my own heritage practice having worked previously for over sixteen years' in the public, private and charity sectors. I have direct experience of working as a conservation officer, having previously worked at Walsall Council and Westminster City Council. I have extensive experience of providing heritage advice in the historic environment and have acted as an expert witness at many Hearings and Inquiries.
- 6.2 I am instructed by the applicant, Railpen, in respect of the proposed redevelopment of the Beehive Centre ["the Application Site"]. My Proof of Evidence relates to heritage issues and undertakes a review of the submitted Bidwells' Heritage Statement and the Council's response to the proposals.
- 6.3 The detailed Heritage Statement (HS) (Bidwells; CD2.40a-d) was prepared in August 2024 and submitted as part of the application. The Heritage Statement, which focused on above-ground built heritage only, contained a detailed appraisal of the Site, an assessment of the heritage significance of the development currently on the Site, and an assessment of the impact of the proposed development on such significance.
- 6.4 Section 4 of this Proof has provided an overview of the identified heritage assets that could be affected by the proposals. The number of heritage assets affected are disputed by the applicant and the local authority, but all assets are assessed within this section outlining their significance and the contribution of setting including what contribution the site makes. From this assessment, I agree with Bidwells' original heritage statement which identified six heritage assets that could potentially be affected, namely:

Mill Road Conservation Area

Christ Church – Grade II

Jesus College – Grade I

All Saints Church – Grade I

Castle and Victoria Road Conservation Area

Central Conservation Area

- 6.5 The Heritage Statement submitted with the application follows a clear methodology that is sufficient to enable the potential impact of the proposals on the significance of the assets to be understood. The Heritage Statement identifies impacts ranging from negligible to minor/moderate adverse. Having reviewed this document in detail, undertaken my own site analysis, I agree with the heritage assets identified within this report that would be likely impacted, but differ in view on the level of impact on the significance of these heritage assets.
- 6.6 The overall harm caused to the identified heritage assets would be negligible in my professional opinion as a consequence of changes to their setting. The reason for this being that the change to setting (excluding Mill Road Conservation Area) would only be readily appreciable from Castle Mound and other long-range views. The ability to appreciate and understand these assets' significance from these vantage points is limited and it is their inherent fabric and immediate

context that contributes most to their heritage value. Change to these long-range views would still allow these assets to be appreciated (albeit to a limited degree due to their distance). In NPPF terms this would be at the lowest end of the less than substantial harm spectrum. Outlined below is a summary of the heritage assets potentially affected and likely impacts on significance:

Table 6 - Summary of all impacts

ASSET	IMPACT ON SIGNIFICANCE
Mill Road Conservation Area	Less than Substantial (LTS) - Lowest end of the spectrum
Central Conservation Area	LTS - Lowest end of the spectrum
Castle and Victoria Road Conservation Area	LTS - Lowest end of the spectrum
All Saints Church – Grade I	LTS - Lowest end of the spectrum
Jesus College – Grade I	LTS - Lowest end of the spectrum
Christ Church – Grade II	LTS - Lowest end of the spectrum

- 6.7 Heritage assets that I believe would remain unaffected by the proposals, but the local authority state will be harmed are:

Mill Road Cemetery (Registered Park and Garden)

Kings College Chapel - Grade I

St Mary the Great Church - Grade I

St John's College - Grade I

University Library - Grade II

Kite Conservation Area

Riverside and Stourbridge Common Conservation Area

- 6.8 I explain my reasoning for this in Table 5.

- 6.9 In terms of compliance with the Council's relevant heritage related planning policies, there is some conflict with policy 61 insofar as a degree of harm has been identified to six heritage assets. In relation to policy 60, the impacts of the proposals on key viewpoints have been assessed and level of harm identified accordingly.

- 6.10 Section 6 of the Topic Paper has highlighted a number of additional heritage assets that the Council's heritage expert suggests may be affected by the proposals. If contrary to the SoCG and section 5 of the Topic Paper, the Council's expert is of the view that there is such harm to the additional heritage assets, this will be addressed on behalf of the Applicant in rebuttal. However, for the reasons set out above I believe this is an error on the part of the Council's expert in the Topic Paper. For the avoidance of doubt, I do not consider that harm is caused to the significance of these additional assets.
- 6.11 In the application of paragraph 215 of the NPPF, a "less than substantial" level of harm at the lowest end of the spectrum should be weighed in the context of public benefits arising from the proposed development. This balancing exercise was set out in the application and will be presented by Mr Kaddish on behalf of the Applicant.

