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Dear Sir

Consultation on Historic England's Draft Advice Note 4 on Tall Buildings

The Institute of Historic Building Conservation is the professional body of the United Kingdom representing conservation specialists and historic environment practitioners in the public and private sectors. The Institute exists to establish the highest standards of conservation practice, to support the effective protection and enhancement of the historic environment, and to promote heritage-led regeneration and access to the historic environment for all.

We are very pleased to have the chance to comment on the consultation document. The Institute's comments are as follows:

We agree that tall buildings may have, individually or cumulatively, greater potential negative impact on the historic environment and on the qualities which people value about a place, if their location, design and context are not appropriately considered. IHBC also agrees that it is important to emphasise the fact that certain locations have qualities that are so distinctive or sensitive that new tall buildings will cause harm regardless of the perceived quality of the proposed design.

The advice concerning the need to develop clear strategic policies to protect and enhance the historic environment, including the settings of designated heritage assets, whilst promoting the characteristics of good design relating to context and the encouragement of local vision and a positive managed approach to development could be expanded. We welcome the sensitivity requirements concerning location of tall buildings and the encouragement of a context led approach. But there is no

consideration of the responsibility which building tall should involve: to make a positive contribution to the skyline, to the town or city, and to the wider landscape setting. It is vital not only to justify proposed height, but also to provide a composed skyline of demonstrable architectural quality.

The highlighting of evidence-based evaluation and the factors to consider is important. IHBC welcomes the guidance for assembling an evidence base in order to review impact on an area of high townscape or landscape value or more specific impacts to heritage assets and their settings. However we suggest that consideration of heritage interest should be weighted on the basis that once impacted upon negatively, reversal of impact is either unlikely to occur or reversal will be unachievable. This section needs to be augmented and strengthened.

In places where tall building development is likely IHBC agrees that there is a need for criteria based policies and a requirement of provision of proportionate evidence to **justify** the approach taken, as well as advocating for the essential nature of setting the highest standards in design. Thomas Sharp set out key issues in terms of justification as long ago as 1963, in 'Dreaming Spires and Teeming Towers' :

*'...New forms should not be ruled out merely because they are unfamiliar. But neither should they be accepted merely because they are novel. And because this particular fashion can have such permanent results, it is especially necessary to consider how far the conditions that created it are sound, how far the acceptance of these conditions is desirable in its effect on the design of individual buildings, and whether or not this effect is acceptable in the total creation, the town, which these buildings effectively make. It is astonishing to think that these matters have not yet been given any serious consideration; but it is difficult to believe that they have, in view of what has been happening in the last few years. It may be that they have been ignored because they seem humdrum and sober against the architect's intoxication in building monuments to himself and his clients. But dull and restrictive though they are, they are infinitely more important than the excitements of architectural megalomania.'*¹

Whilst the checklist for applications is welcomed it is apparent that there have been a great many previous attempts to provide checklists which have not been utilised in a meaningful way. We suggest that the consideration of how an historic area is experienced be included in the list of evidence types to consider. This then supports the recommendation for decision-makers to visit the place in person which we believe cannot be emphasised strongly enough.

In relation to the submission of Planning Applications it would be helpful to provide more detail concerning the requisite information types for

¹ Sharp, Thomas, Dreaming Spires and Teeming Towers, Liverpool University Press 1963

inclusion. It is vital that proposals submitted in planning applications, or for pre-application discussions are shown clearly in relation to their context. The scale of the development must be shown to the wider community. Systematic scrutiny and social judgment are very important messages.

*As Trystan Edwards suggested in 1946 "Every new building before its erection, should be displayed pictorially by means of an honest architectural drawing... which would display the building in relation to its neighbours. The composition should be portrayed from several points of vantage so that we could judge of its effect on the street in which it is situated could be judged and also its effect upon a panoramic or bird's eye view of the city as a whole. Steps should be taken for these drawings to be thoroughly popularised amongst those who as citizens could express their considered opinion on the project. The public may then arbitrate upon the social aspect, and it will be especially well entitled to insist upon those elementary considerations which have to do with the relative status of buildings."*²

Proposed tall buildings must be shown from multiple viewpoints experienced by the public to show their impact on a town or city as a whole. In 1963, as noted by Thomas Sharp, it was the flying of balloons to indicate the heights of controversial new towers proposed by Cambridge University that enabled realistic photomontages. These led to such a strong public reaction that the proposals were rejected. Now, with digital presentations and "Verified views" which only cater for selected viewpoints (not for serial vision or unexpected views), there are real challenges in both getting accurate representations of the full impact of proposed developments, and making these available and understood as widely as possible.

IHBC suggest that there is a need in drawing up this Advice Note to question claimed economic and sustainability arguments. For example according to recent research from UCL, office and residential buildings use more energy per square metre, the taller they are.³ It is also important to emphasise the need to take a long term view of maintenance because in terms of sustainability the concern is that many of these structures will

² Edwards, Trystan, Good and Bad manners in Architecture, Tiranti 2nd ed 1946

³ <https://www.ucl.ac.uk/news/2017/jun/high-rise-buildings-much-more-energy-intensive-low-rise> also featured in CIBSE Journal Carbon emissions rise with height of building Research funded by Engineering and Physical Sciences Research Council studied buildings in 12 London boroughs <https://www.cibsejournal.com/news/carbon-emissions-rise-with-height-of-a-building/>

Ian Gilder "Tall Buildings: A Landowner and Developer's View" to Cambridge PPF Tall Buildings event 2010 <http://www.damtp.cam.ac.uk/user/pvl/TALL/gilder.pdf>

Life-Cycle Energy Implications of Downtown High-Rise vs. Suburban Low-Rise Living: An Overview and Quantitative Case Study for Chicago <https://www.mdpi.com/2075-5309/5/3/1003/htm>

If we care about sustainability, should we still be building super-tall skyscrapers? Lloyd Alter January 13, 2020 <https://www.treehugger.com/green-architecture/if-we-care-about-sustainability-should-we-still-be-building-super-tall-skyscrapers.html>

become obsolete. Whilst IHBC agree that it is really important to emphasise the need for technical input from a range of specialists including heritage advisers in making assessments we believe this point should be reinforced more.

It is not clear to what if any extent this updated guidance incorporates lessons learned from tall building proposals of the past which have been built. There are many critical independent post-construction reviews of contentious tall building schemes which have made recommendations which are highly relevant to this draft Advice. Lessons and recommendations from 2 such reviews⁴, and the CB1 scheme in Cambridge are set out in the Appendix.

In summary, key issues arising from these reviews include the need to:

- review Environmental Impact Assessment procedures
- improve advice on design evidence used to support applications
- enhance member 'training' on design and planning
- ensure that impacts of tall building schemes are fully presented to the wider public at the earliest possible stage
- investigate and adopt the best new field-based approaches to assessing the visual impact of new development
- review the extent of technical support information required to support innovative, technical or high rise planning applications
- for such applications, to require large scale technical drawings (1:20 or 1:5), with such supportive technical reports as are necessary, as part of the set of approved drawings
- consider imposing a design quality section as part of S106 agreements, to include issues arising from changes to the lead architects
- ensure that all new tall / "landmark" buildings are designed "in the round"
- require full planning applications for all tall building schemes within or affecting conservation areas
- ensure full critical appraisal of all assessments provided, and claims made, by applicants in relation to potential benefits and impacts (or lack of them) of proposed tall buildings.
- ensure that historic environment or conservation officer views are presented distinctly and identifiably to decision-makers

From those experiences IHBC conclude that Advice needs to ensure that claimed justifications in terms of 'landmarks or wayfinders' need to be critically interrogated. This is also the case concerning arguments on sustainability and economic viability. Also it is clear that outline applications should not be allowed for tall buildings. IHBC believe there is a need for improved Advice on EIA/ES in order to test wider impacts of tall building proposals. Guidance should recommend that an effective easily

understood model is required for showing and assessing impacts on both predicted and unexpected viewpoints.

A vital omission from this document is the effect of tall buildings on comfort levels for users at ground level. Tall buildings will never be only about aesthetics and adverse effects can harm the surrounding (historic or otherwise) environment. This is recognised by The City of London (and others) in recent guidance.¹³ If the intention of the HE Advice Note 4 is to ensure compatibility with the historic environment then the quality of how outdoor spaces can be enjoyed must be a prime consideration. There is a brief reference to 'microclimatic conditions in relation to clusters of high buildings', see 3.15, but that is all. For this advice note to have credibility then reference to a proper climatic assessment along the lines of the new City Corporation requirement is needed.

In terms of design, the impact is more profound when considering the scale of tall buildings and their impact is consciously made to allow them to stand out. There are many examples of tall buildings which have been executed where the requirement of scale and visual dominance of the skyline has prevailed over quality of design including lack of contextual sensitivity.¹⁴ The issue of controlling quality has not been adequately supported and promoted within the planning framework rather the influence of capitalism has shaped too many poor designs. The concern with this Advice is that it may not be strong enough to implement the desired level of control. The importance of quality design needs to be

¹³ "This City Corporation advice note provides general guidelines for wind microclimate studies required as part of the planning applications of new development proposals in the City of London (CoL). Good wind microclimate conditions are necessary for creating outstanding public spaces in the City for all. Adverse wind effects can reduce the quality and usability of outdoor areas, and lead to safety concerns in extreme cases. These guidelines focus on the primary factors that affect the quality and consistency of wind microclimate studies. Other factors such as temperature, sunlight, air quality and noise also have an influence on outdoor comfort, and some of these factors may be incorporated in a future edition of these guidelines. The guidelines cannot cover every eventuality that may arise in such studies. Therefore, expert judgement from an experienced wind engineer will always be required in wind microclimate studies, particularly for issues that are not explicitly covered by these guidelines".

<https://www.cityoflondon.gov.uk/services/environment-and-planning/planning/design/Documents/city-of-london-wind-microclimate-guidelines.pdf>

¹⁴ Trystan Edwards' "Good and Bad Manners in Architecture" (originally published in 1924, quotation is from the 1946 2nd edition) was and still is very much to the point on tall buildings ("skyscrapers"): "There are great difficulties, however, in making regulations to protect the public in this matter. The extent of the damage in each case is, of course, never realised until the damage is committed and the opportunity of protest is gone. In a well ordered community it would be ordained that every new building before its erection, should be displayed pictorially by means of an honest architectural drawing ...which would display the building in relation to its neighbours. The composition would be portrayed from several points of vantage so that we could judge of its effect upon the street in which it is situated and also upon a panoramic or bird's eye view of the city as a whole. Steps would be taken for these drawings to be thoroughly well popularised among the townsfolk who could then in the exercise of their function as citizens, express their considered opinion upon the project... What the public will arbitrate upon is the social aspect, and it will be especially well entitled to insist upon those elementary considerations which have to do with the relative status of buildings. "How to build a dome is a question for the expert. But "When to build a dome" is a question for the public."

reinforced more strongly in relation to tall buildings, because their visual impact is so inescapable.

IHBC welcomes the inclusion of specific considerations for Planning Authorities in relation to World Heritage Sites and their setting. In relation to World Heritage Sites there should be a reference to the need to carry out a Heritage Impact Assessment (HIA) in line with the ICOMOS Guidance from 2011 (which is currently being updated but the new Draft Guidance is also more helpful than the 2011 version even in its draft form). IHBC also welcomes in the context of World Heritage the statement that 'great weight should be given to the asset's conservation with any harm requiring a clear and convincing justification' and the need for careful scrutiny of any claimed public benefits by decision makers when reviewing the integrity of historic townscape.

It may be worth considering adding advice on installations on tall buildings such as digital screens which can impact significantly on the adjacent historic environment and its setting. For example a skyscraper in Manchester which sits behind the Grade I Midland Hotel in views from St Peter's Square, and is visible in many views of GMEX and the listed railway viaduct next to it, has a large digital half way up it, showing moving adverts.

There can be no doubt that the formulation of an advice for practitioners concerning tall buildings and the historic environment is very challenging in that there is no shining precedent to be found from the last half century, if not more. In order for Historic England to fashion an approach to managing change, in the public interest for the greater good, weighed against the financial might of speculative developers this Advice needs to say and do much more to really matter. This Advice needs to be stronger and more convincing in its recommendations with regard to prudent future action.

Specific Comments on the text to the draft HEAN

- 1.2 Design quality seen from close by may not overcome flaws of massing from a distance
- 1.3 Understanding of historic character, and potential impacts on it, depends on engaging the wider community. A crucial failing is the lack of effective ways of, and consistent standards for, modelling impacts of new tall buildings on their wider contexts.
- 1.4 Assessment of local context is key.
- 1.4 box Cambridge – central area buildings above 6 storeys are subject to the policy - but note that this does not consider the impacts of uniform rooflines of new bulky buildings on a previously lively skyline.
- 2.1-2.4 These paragraphs on the NPPF fail to mention, and should be revised to stress, the pre-eminent need to have a Historic

Environment Strategy (as required by NPPF para 185) as a vital prerequisite for

- a) identifying areas sensitive to tall building proposals,
- b) potential locations for any new tall buildings in sensitive areas.

2.6 The quote, without qualification, of para 69 National Design Guide implies approval in *historic environment terms* of “well-designed tall buildings” acting “as landmarks”, when this “positive urban design role” in new developments may be just the opposite in established historic contexts. Too many new tall buildings are proposed as “landmarks” in contexts where there is no demonstrable need for landmarks or “wayfinding”. The HEAN needs to address this issue, together with the need for new tall buildings to recognise their responsibilities to the wider area, and to be designed in a way that creates and reinforces significance.

2.8 This should again specifically mention the pre-eminent need to have a Historic Environment Strategy (as required by NPPF para 185).

3.1 Agreed, but this is dependent on a strategic assessment of historic character and of its capacity for change (i.e. a Historic Environment Strategy)

3.2-3.17 need to be beefed up with much stronger strategic emphasis. A re-ordered, stronger version of 3.5 stressing the need for a Historic Environment Strategy should precede 3.2

3.2 c) fails to stress need for a settlement-wide approach

3.3 IHBC strongly supports a pro-active approach, including “sifting exercises” to identify or rule out potential locations for tall buildings. However this approach should prioritise the Historic Environment Strategy required by NPPF para 185, preferably supported by up-to-date Conservation Area Appraisals, with Management Plans and reviews of the impacts of recent tall buildings.

This whole paragraph is muddled by a misunderstanding regarding Statements of Heritage Significance: as Historic England’s Advice Note 12 (referenced) makes clear, such statements are information to be submitted by *applicants* as part of applications, not strategic assessments by LPAs. As such, and where they exist, Statements of Heritage Significance are useful adjuncts to, but no substitute for, Local Planning Authority assessments such as Conservation Appraisals and Characterisation Studies.

3.4 This lists a number of potential techniques, with no analysis of their effectiveness, examples of effective models, or best

practice standards. These are vital omissions in the context of digital presentations and so-called "verified views". Can Historic England point to specific existing models or techniques which have been proven to successfully show potential impacts of new tall buildings (both in general and as specific designs) at settlement scale? Conservation Area Appraisals, even the York example cited, are too limited in area and scope for fully assessing strategic views.

- 3.5 This should be much stronger on the NPPF requirement for a Historic Environment Strategy. We suggest it is moved to before the draft 3.2.
- 3.6 For areas and places of significant historic interest, any urban design framework needs to be set within a historic environment strategy. Otherwise, the historic environment will always be playing "catch up" (as at Cambridge).
- 3.7 Any master-planning process needs start with a thorough appraisal of the heritage significance of the area and its surroundings, before developing potential options.
- 3.8 This paragraph is a vital part of the whole document, and an equally vital opportunity to promote best practice. Instead, while it talks about 3D digital models being "increasingly available for towns and cities across England", it does not mention any specific model, identify successes or failures, or promote best practice (see comments under 3.4 above). There is an urgent need for common standards of digital presentation to ensure a) that current and future models provide the quality of representation needed to show (in a publicly-accessible way) how proposed tall building developments would impact their wider context in both expected and unexpected views, and b) that applicants have a clear idea of what type and standard of presentation they should provide.
- 3.9 Views are vital. These need to be properly identified and assessed as part of baseline for Historic Environment Strategies and Local Plans. As with 3.8, this is an important opportunity for Historic England to identify, evaluate and promote best practice. For instance, taking the para 1.4 box examples, Cambridge had a "View Cones" Policy in its 1996 Local Plan, dropped in subsequent Plans, while Oxford continues its View Cones approach. What would Historic England encourage as best practice? Would it advise the "View Cones" approach?
- 3.10 This paragraph should require justification for building tall as opposed to a lower built form. Para 3.16 is highly relevant and should be brought forward.
- 3.11 This is the wrong way round: it should cite the requirement for a Historic Environment Strategy, and then the need to identify

potentially suitable locations within it (see comments on 2.1-2.4 above).

- 3.12-14 Policies crossing LPA boundaries are essential to ensure distant impacts considered: bring forward para 3.17.
- 3.18 SPDs are useful, but must be backed up with requirements for comprehensive, effective modelling to a set standard to convey full impacts (see comments on 3.4 and 3.8 above).
- 4.1 Proposals need to include justification for proposing a tall building rather than different form with lower impact. Such justification should include sustainability comparisons.
- 4.2 Paras 4.2 and 4.3 gloss over issues of applications for large scale developments:
 - 4.2a) needs to be stronger on requiring Environmental Impact Assessments (see Independent Report on Roger Dudman Way, Oxford).
 - 4.2 b) Preliminary discussion with Design Review Panels is generally helpful, but can be problematic if the Panel becomes too wedded to a development (see Independent Review of The Marque, Cambridge).
 - 4.2 c) Needs to strongly discourage the use of outline applications with parameter plans setting out indicative building heights (see CB1, Cambridge). It is vital for large-scale proposals to include a skyline assessment and to be presented in the context of a city (or town)-wide model, with 3D representation
- 4.3 This should explicitly rule out outline applications in (see CB1, Cambridge) or affecting a Conservation Area.
- 4.4 Checklist Should include Conservation Area Appraisals for all CAs affected. (see also 5.7). The scope and standard of 3D Digital models should be specified (see comments on 3.4 and 3.8 above).
- 4.5 Need to include justification for proposed height as opposed to lower built form.
- 4.6-7 Agreed
- 4.8 See comments on 3.4 and 3.8 above. Photographic models are inadequate for serial vision.
- 4.9 EIA needs to take into account full wider impacts: add "in its wider context" to 4.9 a. Proposals should be required to be shown in both summer and winter views, to counter any attempts to use claimed screening value of existing trees to mask impacts.

- 4.10 Buildings should be designed “in the round” so as to be coherent when seen from all directions (see the Marque, Cambridge)
- 4.11–4.12 Agreed
- 5.1 Insert 5.9 (in bold) before 5.1
- 5.1-2 Agreed
- 5.2, 5.3 & 5.6 – 5.9 recognises some of the issues but are wholly inadequate in terms of supporting LPAs in insisting on applicants providing the right information in sufficient detail to allow impacts to be properly assessed. Also in supporting Conservation Officers or Historic Environment teams in reigning back over-enthusiastic politicians and urban design teams.
- 5.3 Virtual reality is entirely dependent on chosen viewpoints. Quality standards essential. See comments on 3.4 and 3.8 above.
- 5.4 – 5.5 Agreed
- 5.6 How to ensure that “big name” architects and their (presumed) design quality are retained to deliver a project? (see The Marque, Cambridge; CB1, Cambridge). This section is nowhere near strong enough or specific enough to ensure that claimed quality is both buildable and actually delivered. Vital to ensure that key elements of building design are submitted and demonstrated to be feasible before any planning permission is granted (see the Marque, Cambridge).
- 5.7 -8 Support
- 5.9 Absolutely vital – should be in bold (and at the start? – see above)

Yours sincerely,

Fiona Newton
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APPENDIX - lessons from Independent Reviews and CB1, Cambridge⁴

In the first review relating to Roger Dudman Way, Oxford where the issues considered concerned building height, wider visual impacts and quality of design a number of relevant recommendations were made. In relation to planning procedures a review of EIA-related procedures was recommended in terms of: *'the advice provided in pre-application discussions; improving the quality of the forms and documentation used; amend the training and briefing of officers in respect of EIA screening process'*.

In relation to visual impacts and quality of design it was *'recommended that existing initiatives to improve the design capacity of the Council should be complemented by action to enhance the use of in-house expertise and to provide members with greater support in their considerations of design issues and visual impacts by:*

- a. Developing greater technical capacity (IT and skills) to take advantage of the rapidly evolving potential for interpreting design and integration with established GIS systems;*
- b. Improving the advice on the design evidence used to support application, in particular in the preparation of Design and Access Statements;*
- c. Enhancing member 'training' on design and planning;*
- d. Investigating and adopting the best new field-based approaches to assessing the visual impact of new development.'*

The second review related to the Marque, Cambridge where issues were considered relating to building heights and impacts, changes of architects, the role of Advisory panel and buildability. It made two relevant recommendations in relation to the technical details needed before granting planning permission to demonstrate that a concept can be built and the second conclusion concerned the need to ensure that original design quality can be protected and delivered. The Marque report recommendations stated:

'135. Recommendation 1: The extent of technical support information required to support innovative, technical or high rise planning applications should be reviewed. Large scale technical drawings (1:20 or 1:5) should be required, with such supportive technical reports as are necessary, as part of the set of approved drawings. The Committee report should include a section on design quality that articulated the design evidence used to support the application' and

⁴ Vincent Goodstadt on Roger Dudman Way in Oxford (https://r.search.yahoo.com/_ylt=AwrEeSSws8NedGEAxwB3Bwx.;_ylu=X3oDMTByOHZyb21tBGNvbG8DYmYxBHBvcwMxBHZ0aWQDBHNIYwNzcg--/RV=2/RE=1589912624/RO=10/RU=http%3a%2f%2fmycouncil.oxford.gov.uk%2fdocuments%2fs16562%2fRDW%2520INDEPENDENT%2520REVIEW%2520FINAL%2520REPORT%2520140107%252017th%2520Jan.pdf/RK=2/RS=Nc9rXFWQcpXOj9ychutRh1Ay.O4-), and Barry Shaw on The Marque in Cambridge (<https://democracy.cambridge.gov.uk/documents/s28175/Barry%20Shaw%20Report.pdf>).

'136. Recommendation 2: The Planning Committee should consider imposing a design quality section as part of S106 agreements. Issues that might be covered should include protecting design quality through changes to the lead architects and the requirement in some circumstances for independent technical support to be paid for by the developer'.

IHBC is concerned to see that Cambridge is cited (along with Oxford) as an example (presumably being commended) of the context-led approach, when Cambridge has too many examples of 'selfish'¹⁵ tall buildings. One of the most selfish of all being a relatively small but boxy hotel upwards extension with roof terrace which claims 'the best views of Cambridge' but wrecks views across Jesus Green to St John's College Chapel. One of the most basic design failings (which would have been highlighted by more thorough multiple viewpoint presentation) of some of Cambridge's new tall buildings is that they have not been considered or designed 'in the round'¹⁶ Consideration of roof top plant is also overlooked in the draft.

There have been many planning controversies concerning Cambridge over the past decade or so. In the case of CB1 Cambridge concerning a major redevelopment of Conservation area site, with one listed building(station) and BLIs. The development was fuelled by the need for regeneration and for an improved transport interchange. The principles were set out in the City Council's Station Area Development Framework 2004.¹⁷ From that a 19th Century Mill and silo were to remain the tallest buildings. Subsequently the development firm Ashwells bought up a larger area of land. Consulting Architect Richard Rodgers was commissioned to lead and promote proposals for a new 'Gateway to Cambridge'.¹⁸ The application was refused for 26 reasons, including 22 adverse impact on Historic Park and Garden, and adverse effect on setting of City, overall character of area and status of Mill and Silo as landmark buildings. This scheme was followed by CB1 Scheme 2 an outline application with parameter plans for redevelopment of the station area.¹⁹

¹⁵ Trystan Edwards' "Good and Bad Manners in Architecture" *ibid*

¹⁶ Arguably worst of all is the Marquee <https://www.bbc.co.uk/news/uk-england-cambridgeshire-31727193> - a 9 -story block to the south of, and overshadowing, a new public square (it might have been better on the north side of the square..). It has a "screen" facade applied to the west and north street elevations only, with no consideration for the fact that the totally unrelieved east elevation of the tower is visible for about a mile along the road to the east! The lack of overall coherence somehow got through the planning process. The screen facade itself is a poor late substitute for what was claimed to be a highly innovative facade treatment that provided to be unbuildable.

¹⁷ <https://www.cambridge.gov.uk/media/2781/station-area-development-framework.pdf>

¹⁸ <https://www.democracy.cambridge.gov.uk/CeListDocument.aspx?CommitteeId=181&MeetingId=2101&DF=15%2f2008&Ver=2>

¹⁹ The comprehensive redevelopment of the Station Road area, comprising up to 331 residential units (inclusive of 40% affordable homes), 1,250 student units; 53,294 sq m of Class B1a (Office) floorspace; 5,255 sq m of Classes A1 /A3/A4 and/or A5 (retail) floorspace; a 7,645 sq.m polyclinic; 86 sq.m of D1 (art workshop) floorspace; 46 sq m D1 (community room); 1,753 sq m of D1 and/or D2 (gym, nursery, student/community facilities) floorspace; use of block G2 (854 sq.m) as either residential student or doctors surgery, and a 6,479 sq.m hotel; along with a new transport

The Applicants' Planning Statement indicated that there were new buildings taller than the Mill and Silo. It wrote in the following terms: '9.143 The building heights have been reduced from the previous scheme to better reflect the character of the site and the surrounding development. The tallest building in the development (block I2), at 9 stories provides a landmark feature in the site to mark it as the gateway to Cambridge. It has however, been carefully positioned to sit back from the Silo and Mill when viewed from the station and square, respecting these buildings as important landmark features and the tallest buildings closest to the station. A variety in building heights will be incorporated to provide interest in the streetscene and the buildings step down towards the station building to respect its scale and also the scale of the Silo and Mill buildings.'

A comprehensive Historic Environment Assessment considered the impact of the proposed developments on the skyline and views of Cambridge, as well as the Conservation Area and settings of the Grade II Listed station and the Silo and Mill (buildings of local interest.) The Assessment highlighted that the majority of buildings proposed would generally blend into the built form of the city, with the only exception being block 12. It concluded that the majority of the buildings proposed will generally blend into the built form of the City, with the only exception being block 12. It concluded that this building, whilst marginally taller than the existing Mill and Silo would act as a wayfinder to this part of Cambridge and help to Karl the presence of the station, with careful modelling of the upper sections of the building would not be detrimental to the skyline. The assessment concluded that in all cases the impact of the proposed development on the skyline and specific view would be negligible, minor moderate or substantial beneficial.

One of the views considered is that from the Botanic Gardens (which is a Grade II* registered Historic Park and Garden), in close proximity to the south west of the site. The assessment analysed the impact of the proposed development from various locations within the Gardens. This revealed that only glimpses of the development will be seen with the most significant impact resulting from other development adjacent to the cb1 site, including the PACE and Triangle sites. Only one proposed building (I2) is likely to be just visible in the skyline and this building will be sensitively designed to ensure that it makes a positive contribution to the skyline. Ultimately the application was approved. The developer went into liquidation. The consulting architect was no longer employed. The scheme

interchange and station square, including 28 taxi bays and 9 bus stops (2 of which are double stops providing 11 bays in total), a new multi storey cycle and car park including accommodation for c. 2,812 cycle spaces, 52 motorcycle spaces and 632 car parking spaces; highway works including improvements to the existing Hills Road / Brooklands Avenue junction and the Hills Road / Station Road junction and other highway improvements, along with an improved pedestrian / cyclist connection with the Carter Bridge; and works to create new and improved private and public spaces.

continues to be built out with a variety of architects involved. The outcome has been described in the Guardian as 'an embarrassment to the City'.²⁰

The 2008 application was approved with relatively little public opposition because the parameter plans were so vague. When the conservation area consent application was submitted for 32-38 Station Road (a Building of Local Interest, due to be replaced by the tallest new building which had outline approval), the potential impacts were now fully apparent to all. There was massive local opposition, leading to refusal (against officer recommendation) of conservation area consent, a successful appeal, and costs of £170,000 awarded against the Council. This award of costs has severely discouraged the Council from resisting inappropriate schemes.²¹

The City Council commissioned an independent report as far back as 2008 to review Design and Conservation aspects. That report found that historic environment comments were subsumed into Policy and Projects and therefore a number of key issues were overlooked. It is critically important that this should not occur. The report also found that Historic England's comments on building height were disregarded.

²⁰ <https://www.theguardian.com/artanddesign/architecture-design-blog/2017/jun/13/an-embarrassment-to-the-city-what-went-wrong-with-the-725m-gateway-to-cambridge>

²¹ 32-38 Station Road Appeal decision

<https://democracy.cambridge.gov.uk/documents/s30391/150906FUL%20-%20Appendix%201%20-%20Appeal%20Decision.pdf>

Demolition condemned by SAVE

<https://www.savebritainsheritage.org/campaigns/recent/415/SAVE-condemns-imminent-demolition-of-historic-Cambridge-terrace-in-Conservation-Area>

£170,000 costs awarded against Council

<https://democracy.cambridge.gov.uk/documents/s24993/Planning%20decisions%20against%20officer%20advice.pdf>