

To: Executive Councillor for Planning and Sustainable

Transport

Report by: Head of Planning Services/Head of Joint Urban

Design

Relevant scrutiny

committee:

Environment Scrutiny Committee 13/3/12

Wards affected: All

GUIDANCE FOR THE APPLICATION OF POLICY 3/13 (TALL BUILDINGS AND THE SKYLINE) OF THE CAMBRIDGE LOCAL PLAN (2006) Key Decision

1. Executive summary

1.1 This report requests the adoption of guidance to support the application of Policy 3/13 (Tall Buildings and the Skyline) of the Cambridge Local Plan (2006). The guidance was formerly referred to as the "Cambridge Skyline Guidance" during previous draft versions up to January, 2012. Following agreement from the Executive Councillor to responses to representations for the draft guidance in January, 2012, final revisions have now been made to the draft document.

2. Recommendations

- 2.1 The Executive Councillor is recommended to agree the responses to the Draft Cambridge Skyline Guidance (October 2011) included in Appendix 1.
- 2.2 The Executive Councillor is recommended to approve the document "Guidance for the application of Policy 3/13 (Tall Buildings and the Skyline) of the Cambridge Local Plan (2006)", attached as Appendix 2, as a material consideration in the determination of future planning applications.

3. Background

3.1 The guidance discussed in this report represents the culmination of several months of consultation and work in formulating a pro-active

- assessment tool to help in the application of Policy 3/13 of the Cambridge Local Plan (2006).
- 3.2 Significant consultation and previous reporting of this subject has been undertaken to date. This includes various workshops in the form of either debates, presentations or resident association meetings in 2009, 2010 and 2011; previous reports to the Development Plan Scrutiny Sub-Committee for authorization on the work program, approach to the document and specific content; and a number of local press articles about the guidance and on the subject of tall buildings in general.
- 3.3 More recently, the draft guidance was subject to a six-week consultation with a number of stakeholders, including residents associations, various interest groups and other stakeholders. The attached guidance represents a final response to all of the input received to date. Appendix 1 Consultation Responses to Draft Skyline Guidance (October, 2011) represents responses to representations received between October 31, 2011, and December 12, 2011. At the January, 2012, Development Plan Steering Sub-Committee meeting, the Executive Councillor agreed the draft responses to the key issues received during the consultation. Final changes have since been made and are included in the guidance.
- 3.4 Subject to approval by the Executive Councillor, the guidance will act as a material planning consideration and be published and loaded on the Council's web page.
- 3.5 It should be noted that as part of the Issues and Options consultation for the Cambridge Local Plan review, it is proposed to consult on future policy for tall buildings. While the current Policy 3/13 is not considered to require a major "overhaul" or re-write, the degree of interest in the subject and the nature of responses received on the draft guidance indicates that it would be sensible to specifically include tall buildings as an Issues and Options topic for the Cambridge Local Plan review. The future status of this guidance will naturally be connected to any future planning policy in the Cambridge Local Plan.

4. Implications

Staff

4.1 None.

Finance

4.2 None.

Environmental

4.3 The approval of this guidance should help support the creation of a high quality built environment specifically in regards to tall buildings across the city through the application of detailed assessment-based criteria. The guidance also helps promote the protection of biodiversity in the form of wildlife that can "inhabit" parts of tall buildings. Finally, the guidance helps underscore the requirement for tall buildings to conform to the Council's Sustainable Construction SPD.

Community Safety

4.4 There are no direct community safety implications.

Equalities and Diversity

4.5 There are no direct physical equality and diversity implications.

5. Background papers

See appendix.

6. Appendices

Appendix 1 – Consultation responses to Draft Skyline Guidance (October 2011)

Appendix 2 – Guidance for the application of Policy 3/13 (Tall Buildings and the Skyline) of the Cambridge Local Plan (2006)

7. Inspection of papers

To inspect the background papers or if you have a query on the report please contact:

Author's Name: Glen Richardson Author's Phone Number: 01223 - 457374

Author's Email: Glen.Richardson@cambridge.gov.uk

Appendix 1: Consultation Responses to draft Skyline Guidance (October 2011)

Public Participation Report

1.0 Introduction

1.0 Introduction

Representations	Nature	Summary of Main Issue	Council's Assessment	Action
1.0 Introduction				
1.0 Introduction				
1.0 Introduction 6776 - Cambridge Past, Present & Future	Object	Justification for a Tall Building: The first assessment criteria must be an unambiguous statement by the developers why their proposal needs to be tall or massive. There are perfectly good justifications - a landmark building or a gateway - but all too often it is just the ego of the architect who wants to make a statement the rest of us don't want to see. There needs to be a compelling reason / very good case expressed as a manifest public benefit. A landmark can also be achieved by not building tall nor bulky (i.e. more place-making or place marking). On the other hand inspirational well designed buildings or iconic gateways might actually improve the skyline of Cambridge. The guidance should also recognise that a higher density of residential occupation can be achieved through well designed 3 - 4 storey buildings than through high-rise as clearly demonstrated in by one speaker at CambridgePPF's workshop (see:	The justification for a tall building will be required by the applicant. This justification will need to be included in the applicant's Design and Access Statement and/ or Heritage Statement.	
		http://www.damtp.cam.ac.uk/user/pvl/TALL/) - must be of a much higher standards than that of any other buildings ('a tall bad building is far worse than anything else') - i.e. it must be of exceptional design, have elegance, grace and real benefits for local people and be of low impact.		
		 Equally it must demonstrate that adequate infrastructure is functional at time of completion of a tall building and no later. 		

Representations	Nature	Summary of Main Issue	Council's Assessment	Action
6768 - Cambridge Past, Present & Future	Object	* The guidance should be of a strong material consideration to be effective and support and enhance the quality of the city's environment - in particular where the historic environment is affected. The document must have a much more elevated position in the planning process (i.e of full material consideration). * The thresholds stated when the skyline guidance comes in to play are too weak. If such is used it needs to come into force at lower buildings heights as Cambridge is a low rise city. * Low carbon footprint of buildings is essential as well as scale of roof-top features and nature of cladding needs to be high quality and within permitted development heights - more consideration required to achieve high quality. * Although some view points are located outside the city, the guidance does not cover the areas of the city administered by South Cambridge District Council i.e. not only the new urban extension/major development sites already identified in the current Cambridge City Local Plan but also parts of Cherry Hinton, Orchard Park, Chesterton Fen, Trumpington etc. The SCDC Policy Team must be involved to get a strong overarching guidance into place. * Any new clusters or accumulation of tall or taller buildings should be undertaken in conjunction with an overarching guiding document such as Area Action Plans and wide public consultation - at neighbourhood scale but also Cambridge City/ SCDC-wide. If a tall/taller building is being proposed in an area without any tall buildings a much more detailed consideration and long-term impact analysis must be carried out.	The document is a material consideration for planning. The thresholds for trigger heights have been now been tightened and are set out within section one of the guidance. The document refers the applicant to the Sustainable Design and Construction SPD in respect to environmental performance of buildings. Both the City Council and South Cambs District Council are committed to effective joint working and public consultation. The height of buildings within major urban extensions are normally set within parameter plans. No new AAPs are proposed at the present time.	Amend paragraph 1.5.6 and 4.4.12 to state 6 storeys and above for the historic core and four storeys and above for the suburbs will be used for the trigger for the assessment criteria.

Representations	Nature	Summary of Main Issue	Council's Assessment	Action
6605	Object	Guidance should be less vague and more stringent - like Oxford's. Focussed on appearance to the visitor and not enough on other issues i.e. congested infrastructure, loss of privacy/light and massing. Acknowledged that little will be permitted within historic core, leaving suburbs to bear the brunt of buildings that will be out of context. Height of 5	6605 Comments noted. The document cannot set new policy and consequently the guidance cannot set out a stringent approach similar to Oxford. The issues of loss of privacy/ light massing are covered within Criteria 4. The trigger height will be changed to a trigger of four storeys or above for areas outside of the historic core. References to distinctive townscape cited within the LDA study will be removed.	Amend paragraph 1.5.6 and 4.4.12 to state six storeys and above for the historic core and four storeys and above for the suburbs will be used for the trigger for the assessment criteria.
	buildings that will be out of context. Height of 5 storeys as triggering tall building guidance too high in mostly two-storey suburbs. Excessive preservation of West Cambridge shifts burden on new tall building proposals to other areas, which are disproportionately disadvantaged by this.			
		burden on new tall building proposals to other areas,		
6692	Object	However, in view of the recent planning applications currently still under review, or successful and so in the pipeline, or which are under construction or have been completed, I am not optimistic about the commitment to the guidance.	Comments noted.	

Representations	Nature	Summary of Main Issue	Council's Assessment	Action
6767 - Cambridge Past, Present & Future	Object	Building must be elegant - appropriate and imaginative at ground level as well as at roof top level - in particular within the heritage environments improved articulation is required * Its mass and height must be appropriate to its surroundings * It should provide a real enhancement to the nearby community * A large or taller building - particularly for residential use - must demonstrate that cohesive communities can be formed and no social deprivation might occur. * The adequacy of the existing infrastructure needs to be ascertained and sustainable transport must be available or delivered at start of any development (including local services, transport, social/ community facilities, green spaces etc) It must not for example: * adversely impact on the character of adjacent or nearby Protected Open Spaces/green spaces, the River Cam corridor and important local and long distances views and panoramas. To date potential adverse impact such as on Cambridge's Green Belt, Commons, Registered Historic Park & Gardens as well as other green spaces is insufficiently considered. * Adversely affect the micro-climate particularly at ground level.	Disagree. The criteria set out within the document provides sufficient guidance.	
6562	Object	The guidance note contains comprehensive, and informative content relating to tall buildings, whilst however not offering clear planning standards to control building heights. The use of the term skyline is unfortunate as it implies distant views of a dramatic silhouette of tall buildings; the last thing the residents of Cambridge wish for.	Comments noted. The document title has been changed to "Guidance for the application of Policy 3/13 (Tall Buildings and the Skyline) of the Cambridge Local Plan (2006)."	Change title of document to "Guidance for the application of Policy 3/13 (Tall Buildings and the Skyline) of the Cambridge Local Plan (2006)."

Representations	Nature	Summary of Main Issue	Council's Assessment	Action
6681 - unex holdings limited	Object	It is noteworthy that there is no reference to tall buildings in the title of the document. This gives the impression that the Council is wishing to distance itself from any suggestion that it could be actively be giving guidance on tall buildings. This is a shame. The Council should positively engage with the concept of tall buildings and how these should be designed, located and integrated into the Cambridge built landscape. If a guidance document is produced which positively welcomes tall buildings, provided that they are designed and located in accordance with a set of detailed criteria within the report, the document will be fully embraced by architects and developers who will regard it as there "bible". If the overall impression, however, is that the document regards anything which is taller than its neighbours as a potential problem then the guidance document will be seen as a hurdle which has to be overcome rather than something which is a welcome and useful design tool.	Comments noted. The title of the document has been changed to make 'Guidance for the application of Policy 3/13 (Tall Buildings and the skyline) of the Cambridge Local plan (2006).' Tall buildings are not being actively promoted by the council but will be assessed against a number of criteria to ascertain their appropriateness. The guidance cannot create new policy.	Change title of document to "Guidance for the application of Policy 3/13 (Tall Buildings and the Skyline) of the Cambridge Local Plan (2006)."

Representations Nature Summary of Main Issue Council's Assessment Action

6857 - Commercial Estates Group Object

Concern over working definition of tall building and that Policy 3/13 already includes a definition of tall building. Concern over possible mis-use of triggers for assessment criteria being too broad. Objections to fact that development of Cambridge Estates Group lands would not adversely impact various views noted in draft guidance. Objection to all criteria on the grounds that no information has been provided about how judgements will be made in regards to information submitted to satisfy requirements of the criteria.

Policy 3/13 does NOT act as a definition of tall buildings, it is far from sufficient to be able to enable an understanding of "tall" as a working definition. Rather, there is a widely accepted definition of tall, and it is quite legitimate for the Council to refer to the CABE definition contained in what constitutes national best practice guidance they set out in 2007. The triggers are not hard and fast, the guidance makes this clear, but equally there is always an element of judgement required and the Council is quite within its rights to make the "call" as to when the height triggers should be applied; the proposed triggers of six or four stories are merely a benchmark. Adopted planning policy (in this case Policy 3/4 of the 2006 Local Plan) makes clear that "context" is key to the acceptability, or otherwise, of new development: the triggers are simply there to provide steer as to what situations the criteria will likely apply, without which there would be an even greater level of uncertainty as to when to apply them. The concerns over impact, or lack thereof. over Cambridge Estates Group land is purely subjective at this stage as it is impossible to "test" the consultant's assertions as to the impact of their client's proposed SHLAA site on the views shown in the draft guidance. All information provided to satisfy the requirements of the criteria will be assessed, and conclusions made, using existing Local Plan policies such as Policies 3/4, 3/7 and 3/12; this is no different from what the Council has to do now when there is guidance available which underpins planning policy. The guidance repeatedly makes clear that existing planning policy helps underpin the criteria, and so it is adopted policy which will act as the basis for assessing the information submitted by an applicant.

Representations Nature Summary of Main Issue Council's Assessment Action

6856 - Cambridge South Consortium

Object

Concern over working definition of tall building and that Policy 3/13 already includes a definition of tall building. Concern over possible mis-use of triggers for assessment criteria being too broad. Objections to fact that development of Cambridge South Consortium lands would not adversely impact various views noted in draft guidance. Objection to all criteria on the grounds that no information has been provided about how judgements will be made in regards to information submitted to satisfy requirements of the criteria.

Policy 3/13 does NOT act as a definition of tall buildings, it is far from sufficient to be able to enable an understanding of "tall" as a working definition. Rather, there is a widely accepted definition of tall, and it is quite legitimate for the Council to refer to the CABE definition contained in what constitutes national best practice guidance they set out in 2007. The triggers are not hard and fast, the guidance makes this clear, but equally there is always an element of judgement required and the Council is quite within its rights to make the "call" as to when the height triggers should be applied; the proposed triggers of six or four stories are merely a benchmark. Adopted planning policy (in this case Policy 3/4 of the 2006 Local Plan) makes clear that "context" is key to the acceptability, or otherwise, of new development: the triggers are simply there to provide steer as to what situations the criteria will likely apply, without which there would be an even greater level of uncertainty as to when to apply them. The concerns over impact, or lack thereof. over Cambridge South Consortium land is purely subjective at this stage as it is impossible to "test" the consultant's assertions as to the impact of their client's proposed SHLAA site on the views shown in the draft guidance. All information provided to satisfy the requirements of the criteria will be assessed, and conclusions made, using existing Local Plan policies such as Policies 3/4, 3/7 and 3/12; this is no different from what the Council has to do now when there is guidance available which underpins planning policy. The guidance repeatedly makes clear that existing planning policy helps underpin the criteria, and so it is adopted policy which will act as the basis for assessing the information submitted by an applicant.

Representations	Nature	Summary of Main Issue	Council's Assessment	Action
6773 - Cambridge Past, Present & Future	Object	The Title of the Guidance: The title should be broadened along the lines of Cambridge Guidance for the Assessment of Prominent Buildings. Prominent buildings should then be defined as any building that for reasons of height, scale or mass, stands out conspicuously from the general character of its surroundings. Certainly the reference to Skyline in the title implies distant panoramas alluding to views of dramatic silhouettes of tall buildings - perhaps the last thing residents of Cambridge wish for. The inappropriate title of the guidance needs review.	Comments noted, the document title has been changed to "Guidance for the application of Policy 3/13 (Tall Buildings and the Skyline) of the Cambridge Local Plan (2006)."	Change document title to read "Guidance for the application of Policy 3/13 (Tall Buildings and the Skyline) of the Cambridge Local Plan (2006)."
6855 - South Cambridgeshire District Council	Object	As the Cambridge skyline is such a sensitive and emotive issue clear guidance should be provided for developers as to how development proposals should be presented for the assessment of impacts on the skyline, from both within and without the city, including in relation to the existing building massing and heights of Cambridge, the underlying and surrounding landform, the rural landscape setting of the city and the impact on areas and buildings of heritage importance.	Disagree. The criteria do provide clear guidance for the developer.	

Representations	Nature	Summary of Main Issue	Council's Assessment	Action
6762 - Cambridge Past, Present & Future 6763 - Cambridge Past, Present & Future 6764 - Cambridge Past, Present & Future 6765 - Cambridge Past, Present & Future 6766 - Cambridge Past, Present & Future 8766 - Tambridge Past, Present & Future	Object		Disagree. As was set out in the October 2011 DPSSC report and noted clearly in the draft for consultation, the guidance was NOT written in order to create new policy (suggesting possible locations for "tall" would in effect be creating new policy). Rather, it was prepared in order to help interpret Policy 3/13 of the Cambridge Local Plan. The Council believe the document is at the right level of prescription in order to help interpret Policy 3/13. As noted in paragraph 1.1.2 the intention is not to rewrite or create new policy. The current Policy 3/13, backed up by the new guidance, would be sufficiently rigorous when fully applied to assess tall buildings in or around the historic core or in conservation areas. The Council believe the development of the proposed criteria based assessment is responsive to individual sites and different types of development. Purely relying on heights in metres will be difficult for the public to visualise. Instead a combination of heights in metres and floor numbers will be provided (as was recently done in respect of the Eastern Gate SPD). It is assumed that where commercial floor uses are proposed, the floor to ceiling height will typically be around 3.7m (4m floor to floor height). Upper residential floors are assumed to have a 2.7m floor to ceiling height (3m floor to floor height). Floor to floor heights assume a 300-400mm depth of construction for floors. Consequently a six storey building would correspond to a 19m building height in the historic core and a four storey building in the suburbs would be 13m. It is proposed to add a section to the text that will require developers to provide a justification for tall or taller buildings. The document has deliberately avoided identifying specific areas for tall buildings. A landmark building does not need to be a tall building. This will be acknowledged in section 3 of the guidance. The review of the Cambridge Local Plan is the appropriate opportunity to consider and debate a specific "location-based" approach to tall bui	justification for tall or taller buildings. The document has deliberately avoided identifying specific areas for tall buildings. Add text outlining where localised increases in building height can be desirable, in areas such as at local nodes ("focal points of urban activity"), city junctions, at the ends of vistas, to mark key corners, and at transport junctions.

Representations	Nature	Summary of Main Issue	Council's Assessment	Action
			However The Council believe it is considered that the guidance should set out the right "conditions" for increases in building height (though it must be stressed this is not new policy per se). The Urban Design Compendium (English Partnerships, 2000) sets out some useful guidance in this regard, stating that localised increases in building height can be desirable in areas such as at local nodes ("focal points of urban activity"), city junctions, at the ends of vistas, to mark key corners, and at transport junctions. Text along these lines will be added in the appropriate section of the guidance.	
6477 - Cambridge City Council Design and Conservation Panel	Object	'Skyline.' The word 'skyline' places too much emphasis on the distant views and, in so doing tends to undermine the objective to stress the importance of middle and near views too. The Panel suggested that 'Skyline & Setting Guidance' could be considered as an alternative title.	Comments noted, the document title has been changed to "Guidance for the application of Policy 3/13 (Tall Buildings and the Skyline) of the Cambridge Local Plan (2006)."	change document title to read "Guidance for the application of Policy 3/13 (Tall Buildings and the Skyline) of the Cambridge Local Plan (2006)."
6772 - Cambridge Past, Present & Future	Object	Regret that public consultation does not cover the illustrations as many errors and omissions Needs to be more quantitative not just qualitative. Bulky buildings now domineering the skyline - from Cambridge Leisure to CB1/ station area - all well above the tree line	Illustrations will be revised. Additional information in relation to heights of buildings in metres will be added.	Include graphics, maps and diagrams in the final report. Add building heights in metres for all landmark buildings listed in 3.12
6771 - Cambridge Past, Present & Future	Object	The purpose, as stated in Paragraph 1.1.2, is to set out in more detail how Policy 3/13 can be applied for tall buildings or those of significant massing in the City. However the guidance focuses predominantly on tall buildings with only incidental reference to buildings of significant mass. The City needs clear guidance on how any building that for reasons of height, scale or mass, stands out conspicuously from the general character of its surroundings. Buildings of excessive mass, scale or poor quality design can be every bit as intrusive as buildings of exceptional height, and they should be included in a broader guidance. Paragraph 4.4.17 talks about producing a separate "building mass strategy", but why not incorporate this within one set of guidelines?	Comments noted. The building mass strategy will form part of the visual appraisal process. The wording of the text will be changed to make this more explicit.	Amend text so the building mass strategy forms part of the visual appraisal process.

Nature Summary of Main Issue Representations Council's Assessment Action 6775 - Cambridge Past, Present Object Application of the Guidance: Comments noted. The term significant must be considered on a case by case basis. As examples, a & Future - The many considerations and assessment criteria in four-storey building next to a two-storey building Section 4 only apply to buildings that could be considered significant (though something are 'significantly taller' than their surroundings. Without like the roof form, whether flat, pitched or otherwise the definition of 'significant' it is could impact such a finding). However, a 10-storev difficult to see how the guidance can be applied. Will in building next to an eight-storey building may not be time incremental heights achieved? considered significant. Thus the conclusion of what - Paragraph 1.5.6 is too vague and permissive - it is considered "significant" is entirely dependant on what and where it is proposed. Therefore, to enable states that the guidance would be triggered for any proposal of 7 storeys (22m) or more appropriate flexibility of the guidance and to allow for in the core area of the city, and for proper interpretation of each case, a specific buildings of 4 - 6 storeys (16m) when close to heritage definition of "significant" is not proposed. assets or cherished views. It would also be triggered for buildings of 5 storeys or more in the suburbs. A set height is desirable for clarity, but risks omitting lower buildings that may be unacceptably intrusive in their surroundings - for example, the Hilton Doubletree Hotel extension which is lower than the proposed trigger but adjacent to special spaces the Green Belt/ Common/ Protected Open Space. - Could the building height thresholds be reduced? Given that the overarching character

of the City is low rise, punctuated by few taller buildings, the thresholds should seek to protect this as their starting point.

- Use the number of storeys as the trigger is inappropriate. The ceiling heights of

buildings to accommodate the

height in metres should be used.

on rooftops. Paragraph 4.4.16 is

definitive statement that building

the articulation of roofscapes

where they add to the height of the

and forms such as at CB1 to ensure

exceeded because of the unsightly

commercial buildings are greater than for residential

services and ducting behind a false ceiling, so total

- The stated heights of proposed buildings are often

positioning of plant and telecommunications facilities

welcome but it merely states the obvious - we need a

building. Could the guidance give greater attention to

(ref para 4.4.16), particularly on larger building blocks

retention of the detailed and complex roofscape of the

services are generally not acceptable on rooftops

Representations	Nature	Summary of Main Issue	Council's Assessment	Action
		City that exists? - Could the guidance be more protective in respect of the historic core and only permit tall buildings (over the thresholds - see below) in exceptional circumstances where detailed consideration has been given and there is a positive contribution to the City's skyline? This should cover all Conservation Areas.		
6511	Support	See scanned submission for text changes and suggestions Congratulates the team for the document.	Comments noted, suggested details and amendments have been included.	
6489 - Cambridge City Council Design and Conservation Panel	Support	Concerns the guidance did not identify locations for taller buildings.	Concerns noted. As noted in the draft for consultation, the guidance was not written in order to create new policy (suggesting possible locations for "tall" would in effect be creating new policy). Rather, it was prepared in order to help interpret Policy 3/13 of the Cambridge Local Plan. The review of the Cambridge Local Plan is the appropriate opportunity to consider and debate a specific "location-based" approach to tall buildings. In response to representations and in an attempt to provide greater clarity about location for "tall", it is considered that the guidance should set out the right "conditions" for increases in building height (though it must be stressed this is not new policy per se). The Urban Design Compendium (English Partnerships, 2000) sets out some useful guidance in this regard, stating that localised increases in building height can be desirable in areas such as at local nodes ("focal points of urban activity"), city junctions, at the ends of vistas, to mark key corners, and at transport junctions. The guidance will be revised to make reference to where localised increases in height may be suitable.	Reference areas where localised increases in height would be desirable, for example at key nodes, city junctions, ends of vistas, to mark key corners and at transport junctions (as detailed in The Urban Design Compendium, English Partnerships, 2000).
6769 - Cambridge Past, Present & Future	Support	Surely we can all support the Vision for the Cambridge Skyline Guidance (1.3.1) - to maintain the overall character and qualities of the Cambridge skyline as the City continues to grow and develop into the future. It would be good if a little more ambition could be shown so that it sought to enhance rather than just maintain.	Comments noted - the aspiration to enhance the skyline will be added to the vision	Add text outlining the aspiration to enhance the skyline.

Representations	Nature	Summary of Main Issue	Council's Assessment	Action
6572 - Natural England 6578 - Brunswick & North Kite Residents Association (BruNK)	Support		Support noted.	
6471	Support	Our Association [Rustat Neighborhood Association] thinks that this policy is much needed, and that overall, it makes good sense, following broadly the conclusions reached at a CPPF conference last year. We believe it will help developers, planners and residents in the process of considering planning applications. We also welcome the comprehensive review of the townscape and character of the city	Support noted.	
6512	Support	Response includes a summary of the 2010 Tall building debate.	Comments noted.	
6552	Support	I have looked at the draft paper on tall buildings. The general discussion appears to be appropriate. However, from my view point, living in housing on the western side of Cambridge in an area of domestic housing, the following points need to be taken into account: 1. if housing is built which is adjacent to existing housing, its height should not exceed that of the existing housing; 2. the density of housing should not be greater than existing housing density; 3. the land ("realm"?) around new housing should give space for recreation and community and should be sufficient to avoid intrusive overlooking of neighbouring properties. 4. the height of tall buildings should be particularly restrained, where they would be either in, or clearly visible from, an existing Conservation Area.	Comments noted. Housing design should be informed by the local context of the area under Policy3 / 4 and meet the requirements of Policy3/7. However the document can not set and should not set policy requiring all housing to be of the same height and density of adjacent housing. Issues of overlooking will be addressed within Criteria 4 'Amenity' and by Policies 3 / 4 and 3/7 of the Local Plan.	Include references to overlooking, policy 3/4 and 3/7 of the Local Plan within Criteria 4.
		I hope that these comments are appropriate to feed into the consultation on Cambridge Skyline Guidance.		

Representations	Nature	Summary of Main Issue	Council's Assessment	Action
6738 - Beacon Planning Ltd	Support	It is considered that the guidance is unnecessarily 'wordy' with much information that could be better located in an Appendix. It is not until page 35 that the most relevant component - the assessment criteria - is reached. We suggest that this section (with some minor amendments) should become the guidance and the rest of the document (after some serious editing) should either be deleted of become an appendix. The excessive amount of description of the city and its setting is unnecessary as it repeats information already published by the Council. The Council already has at its disposal through the policies in the adopted Local Plan and the national requirement for applications to be accompanied by a Design and Access Statement to require developers to produce information to allow the proper evaluation of development proposals. On major sites where an Environmental Impact Assessment is required the Council through a Scoping Opinion seek an even greater amount of information and assessment. If an applicant fails to submit an adequate context appraisal then it would appear to us to be reasonable to require further work to be undertaken. It is our experience that good developers will produce this information as a matter of course. We have previously drawn your attention to the omission of any reference to the 'Air Safeguarding Zones'. Given that this sets out very prescriptive maximum heights, (and we are aware that these then feature in property title documents), then some guidance should be included about how the Safeguarding Zones should be considered and thew weight to be attached to them. As the height limit for the historic city centre and station area is set at 50ft (15.2m) and there are clearly a substantial number of buildings already in excess of this height, approval must (?) have been obtained from the relevant authorities. In summary therefore we would question whether there is a need for this guidance at all. If the Council wish to prepare a 'methodology note' for the submission of information to	Comments noted. There was a deliberate decision taken in preparing the guidance to produce a detailed, robust and defensible assessment of the landscape/urban character of the city and its existing skyline. This approach was based upon the Bristol City Council Tall Building Strategy. It is important to set out the context of the city and identify key views. However it is acknowledged that Chapter 3 in particular is a particularly long chapter and will be summarised with more detailed information included in an appendix. "Zones" e.g. local nodes, etc., will be set out as possible "conditions" for tall buildings as noted earlier e.g. at local nodes, city junctions, at the ends of vistas, to mark key corners, and at transport junctions. Beyond this, stating specific locations and their boundary limits is not appropriate at this stage and should be considered as part of the Local Plan review.	A summary to be provided in chapter 3 with detail to be provided in an appendix, photographs, illustrations and graphics will be added to enable the reader to better interpret the text.

Representations	Nature	Summary of Main Issue	Council's Assessment	Action
6849 - South Cambridgeshire District Council	Support	The city of Cambridge sits in the wider rural landscape of South Cambridgeshire and any changes to the city skyline would impact on the character of that wider rural setting. South Cambridgeshire District Council, therefore, welcomes the publication of the Draft Cambridge Skyline Guidance and the direction the final document will provide to direct developers towards the formulation of appropriate development proposals, sensitive to the city's wider setting. The comments of South Cambridgeshire District Council are combined into the following overarching issues. These comments are presented in two categories; firstly, are comments addressing the potential impact on the views of the Cambridge city skyline from South Cambridgeshire; and secondly; comments on the format of the document, to assist in the provision of clarity and direction for developers and their addressing of the sensitive and emotive issue of potential intrusions into the Cambridge city skyline.	Comments noted.	
6691	Support	In response to your consultation as above, I wish to register my general support.	Support noted.	
6735 - Windsor Road Residents Association (WIRE) committee 6737 - Beacon Planning Ltd	Support		Support noted.	

Representations	Nature	Summary of Main Issue	Council's Assessment	Action
6579 - Brunswick & North Kite Residents Association (BruNK)	Support	BruNK covers a part of the City that includes all of the features above ie:	Comments noted.	
		a.BruNK's area is predominantly streets of residential dwellings		
		b.BruNK's area includes Christchurch on Newmarket Road		
		c.BruNK's area has over 60 Grade II Listed buildings, including some of the best domestic Georgian, Regency and early Victorian architecture in Cambridge on Maids Causeway, eg the "Doll Houses" built by Cambridge architect Charles Humfrey, now commemorated by a blue plaque at the corner of Maids Causeway and Fair Street		
		d.Maids Causeway and Newmarket Road are part of the Kite Conservation Area		
		e.BruNK's northern boundary is adjacent to Midsummer Common; our south western boundary abuts New Square - both are important green spaces in the centre of the City		
		f.The views from, towards and beyond Midsummer Common in every direction are an important and valuable feature of the City		

Representations	Nature	Summary of Main Issue	Council's Assessment	Action
6770 - Cambridge Past, Present & Future	Support	It sets out the existing baseline situation in relation to the landscape character and townscape of Cambridge (Section 3)	Disagree. As was set out in the October 2011 DPSSC report and noted clearly in the draft for consultation, the guidance was NOT written in order to create new policy (suggesting possible locations	Add 'storey height' to the glossary and define as 'where commercial floor uses are proposed, the floor to ceiling height will typically be around 3.7m (4m floor to floor height). Upper residential floors
		The coverage of the assessment criteria is good as is the consideration of each topic - what is lacking are a set of more specific measures.	for "tall" would in effect be creating new policy). Rather, it was prepared in order to help interpret Policy 3/13 of the Cambridge Local Plan.	are assumed to have a 2.7m floor to ceiling height (3m floor to floor height). Floor to floor heights assume a 300-400mm depth of construction for
			The Council believe the document is at the right level of prescription in order to help interpret Policy 3/13. As noted in paragraph 1.1.2 the intention is not to	floors. Consequently a six storey building would correspond to a 19m building height in the historic core and a four storey building in the suburbs would be 13m'.
			rewrite or create new policy. The current Policy 3/13, backed up by the new guidance, would be sufficiently rigorous when fully applied to assess tall buildings in or around the historic core or in conservation areas.	Add text that will require developers to provide a justification for tall or taller buildings. The document has deliberately avoided identifying specific areas
			The Council believe the development of the proposed criteria based assessment is responsive to	for tall buildings. Add text outlining where localised increases in
			individual sites and different types of development. Purely relying on heights in metres will be difficult for	building height can be desirable, in areas such as at local nodes ("focal points of urban activity"), city junctions, at the ends of vistas, to mark key corners,
			the public to visualise. Instead a combination of heights in metres and floor numbers will be provided (as was recently done in respect of the Eastern Gate	and at transport junctions.
			SPD). It is assumed that where commercial floor uses are proposed, the floor to ceiling height will typically be around 3.7m (4m floor to floor height).	
			Upper residential floors are assumed to have a 2.7m floor to ceiling height (3m floor to floor height). Floor to floor heights assume a 300-400mm depth of	
			construction for floors. Consequently a six storey building would correspond to a 19m building height in the historic core and a four storey building in the suburbs would be 13m.	
			It is proposed to add a section to the text that will require developers to provide a justification for tall or taller buildings. The document has deliberately avoided identifying specific areas for tall buildings.	
			A landmark building does not need to be a tall building. This will be acknowledged in section 3 of the guidance.	
			The review of the Cambridge Local Plan is the appropriate opportunity to consider and debate a specific "location-based" approach to tall buildings.	

Representations	Nature S	Summary of Main Issue	Council's Assessment	Action	
			However The Council believe it is consider guidance should set out the right "condition increases in building height (though it mus stressed this is not new policy per se). The Design Compendium (English Partnerships sets out some useful guidance in this regathat localised increases in building height of desirable in areas such as at local nodes (points of urban activity"), city junctions, at vistas, to mark key corners, and at transportations. Text along these lines will be acappropriate section of the guidance.	ns" for t be e Urban s, 2000) rd, stating can be "focal the ends of	

Representations	Nature	Summary of Main Issue	Council's Assessment	Action
6698 - Park Street Residents' Association (PSRA)	Support	This response is from Park Street Residents' Association (PSRA) which seeks to represent those who live in the following streets: Park Parade, Lower Park Street, Park Street, Portugal Place, Portugal Street, New Park Street, St John's Road, Richmond Terrace and Thompson's Lane, including Beaufort Place. All of these streets are within the Central Conservation Area.	Comments noted.	
		The PSRA area includes one of the most controversial tall building in Cambridge, the Varsity Hotel in Thompson's Lane. This building is mentioned three times in the Draft Guidance: in para 2.1.1, in para 3.11.7 and in para 3.12.1 (iv) where it appears in a list of post war 'landmark' buildings.		
		PSRA objected to the planning application for this building and notes that the planning committee chose to ignore the advice of the planning officer and voted by seven votes to three to approve it at the planning meeting on 25 July 2003. We understand that the Local Government Ombudsman upheld a charge of maladministration in relation to this decision.		
		PSRA therefore feels well placed to offer comment on this Guidance, living as we do with this seven storey building plus roof terrace towering above us and which is described in the Guidance as sitting " in marked contrast to the surrounding low level residential buildings." (para 3.11.7)		
		We have been asked when commenting to say whether we support or object to the sections/paras to which we refer and to provide justification for objecting or support. We do so below. But it seems inappropriate to object or to support some clauses e.g. those consisting of observations so we have instead offered a comment.		
		In 1.1.2 We note that this Guidance, when approved, will be a material consideration in the review of planning applications.		
		in 2.3.2 We note also the much more important fact that the review of the Local Plan is now also under way and that this guidance 'will help feed into that process'.		

Representations	Nature	Summary of Main Issue	Council's Assessment	Action
1.1 Scope, purpose and sta	tus			
6575 - Cambridgeshire County Council	Support	The Cambridgeshire and Peterborough Minerals and Waste Plan (Core Strategy and Site Specific Proposals Plan) makes a number of allocations for waste management development in Cambridge City. This includes allocations in Cambridge Northern Fringe East, Cambridge East and at Addenbrooke's Hospital, Cambridge. The approach taken in the Plan is not to be prescriptive about the nature of the waste management technology that will come forward, and therefore it is difficult to say if proposals are likely to breach the draft guidance set out in the Cambridge Skyline document.	Comments Noted. The Council would expect any new waste management facility or potential new stack for Addenbrookes to require an Environmental Impact Assessment to be undertaken. This would include a chapter on Landscape and Visual Impact matters that would address potential impacts on the character and views of the city. The landscape/ visual impact of the proposals would need to be balanced against the scheme's overriding need in respect to public health.	
		The exception to this is the allocation for an Area of Search at Addenbrooke's Hospital, Cambridge for a replacement clinical waste management facility (energy from waste). In this case the new waste management facility is likely to require a chimney stack. Its precise height, form and location will not be known until the allocation is taken forward through a planning application. The timescale for this is unknown. It is suggested that the Guidance recognises the need for this type of facility in the area to serve the operational needs of the Hospital.		
1.1.1				
6606	Object	"New buildings which are significantly taller than their neighbours" 'Significantly' in this sentence is open to interpretation by developers	Comments noted. The term significant must be considered on a case by case basis. As examples, a four-storey building next to a two-storey building could be considered significant (though something like the roof form, whether flat, pitched or otherwise could impact such a finding). However, a 10-storey building next to an eight-storey building may not be considered significant. Thus the conclusion of what is considered "significant" is entirely dependent on what and where it is proposed. Therefore, to enable appropriate flexibility of the guidance and to allow for proper interpretation of each case, a specific definition of "significant" is not proposed.	

Representations	Nature	Summary of Main Issue	Council's Assessment	Action
6115 -	Object	To me the policy comes across as extremely conservative. It is difficult to see how any new tall buildings with any spirit will get built. Cambridge needs tall buildings, it is short of space and largely flat. Draft plan appears to make every thing import except new high quality, practical and attractive tall buildings. Every thing is stated in negative terms. It should not detract for this or that. Why not state that it should add or contribute to the architectural surroundings and list a few of the ways. Here are some examples: New tall buildings should aim to create attractive vistas and views from street level. They should improve the skyline, by providing attractive shape, colour, lighting and proportion. Where access, visibility for green spaces or county side has been cut or will be cut off by developments. Buildings should be designed with roof gardens or sections where plants may be grown up them bring access to nature into the urban environment. This should be stated for all areas that have an excess of stone and concrete. Where areas are becoming to overly enclosed. Why not request that public access viewing, and seating amenities are provided. So that people can escape to enliven there spirits and bring and gain a healthy perspective on there local environment. Where shading and lighting is an issue why not request mirrored surfaces and angles such that they reflect the light and the sky into the street seen and or transparent construction using glass that allows light to pass through the building.	Disagree. This guidance is not a Tall Building Strategy. The purpose of the document is not to actively promote tall buildings but instead to ensure any new tall buildings are of the highest quality and are appropriate to the local context. This will be driven by design based criteria assessment.	
6117 - Cambridge City Council 6118 - Cambridge City Council	Support		Comments noted. A short paragraph in relation to biodiversity will be added to the criteria. Applicants will be referred to Section 2.6 of the Sustainable Design and Construction SPD.	Add text referencing biodiversity and section 2.6 of the Sustainable Design and Construction SPD.

Representations	Nature	Summary of Main Issue	Council's Assessment	Action
6699 - Park Street Residents' Association (PSRA)	Support	Para 1.1.1 to 1.4.2. Scope, Background, Vision, Aims & Objectives. We SUPPORT all of these. They say why Cambridge is special and describe a vision for the city which seems likely to receive widespread support from those who live and work here.	Comments noted.	
6662	Support	This is a good document. I have picked out the concerns I have but I support the document as a whole. A muddled presentation in the whole document about the relative height of "significantly taller" undermines the clarity and robustnes that you seek.	Comments noted. The term significant must be considered on a case by case basis. As examples, a four-storey building next to a two-storey building could be considered significant (though something like the roof form, whether flat, pitched or otherwise could impact such a finding). However, a 10-storey building next to an eight-storey building may not be considered significant. Thus the conclusion of what is considered "significant" is entirely dependent on what and where it is proposed. Therefore, to enable appropriate flexibility of the guidance and to allow for proper interpretation of each case, a specific definition of "significant" is not proposed.	
a				
6113	Support	The Varsity Hotel mentioned at 3.11.7 is a typical example of failure to take account of local residential amenity.	Comments noted.	
e				
6114	Support	Views from our greens and open spaces which show details of ancient urban architectural skylines should be preserved.	Comments noted.	

Representations	Nature	Summary of Main Issue	Council's Assessment	Action
1.3 Vision				
6774 - Cambridge Past, Present & Future	Object	Clarity of the Guidance: Other than the loose statement in Paragraph 4.4.12 that tall buildings in the core area are "unlikely to be supported", the guidance gives little indication as to whether or not tall buildings will be approved in Cambridge, and what the conditions are for achieving such approval. A more rigorous, unambiguous, statement is required along the lines of: There will be a presumption against the approval of buildings that for reasons of height, scale or mass, stand out conspicuously from the general character of their surroundings in the central Historic Core of the city, in Conservation Areas, and on higher ground where their positioning may accentuate their size. Approval will be granted in these sensitive sites only under exceptional circumstances with the clear demonstration of an over-riding public benefit. This statement shows unambiguously that tall or massive buildings will not generally be approved in sensitive areas: All designated Conservation Areas are included along with the Historic Core.	Comments noted. Disagree that a more rigorous statement is required. The current policy, backed up by the new guidance, would be sufficiently rigorous when fully applied to assess tall buildings in or around the historic core or in conservation areas. A blanket presumption against tall could have the disbenefit of prohibiting any good tall buildings in the historic core.	
1.3.1				
6607	Object	The Vision outlined in this section is I believe a good example of the unnecessary emphasis that is placed on appearance over the practical issues associated with tall buildings. The Vision should I believe capture these other factors (congestion, light, privacy, massing etc).	Comments noted. The current draft guidance does include criteria, which require consideration of many more factors besides building height alone, including light, privacy and massing, amongst others.	

Representations	Nature	Summary of Main Issue	Council's Assessment	Action
6481 - Cambridge City Council Design and Conservation Panel	Support	Vision. The Panel questioned whether the document was sufficiently ambitious. There is an opportunity here to enhance as well as to maintain the City's character.	Comments noted. The guidance is specifically prepared to assist in the use and application of Policy 3/13 of the Cambridge Local Plan. Consideration of a more "ambitious" approach to tall buildings in the future should be part of the discussion and debate within the Local Plan review and a possible future version of Policy 3/13. A suggested revision to the title, which would be more accurate, and to the point, would be "Guidance for the application of Policy 3/13 (Tall Buildings and the Skyline) of the Cambridge Local Plan (2006)".	Change the title of the guidance to "Guidance for the application of Policy 3/13 (Tall Buildings and the Skyline) of the Cambridge Local Plan (2006)".
1.4.1				
6784 - Cambridge Past, Present & Future	Object	1.4.1 Last bullet - should include 'tall' and 'bulky' buildings	Disagree. Bulky, if taken to mean significant scale and massing, is considered through the relevant criteria within the document and additionally through other policies within the Local Plan.	
6587 - English Heritage (East of England Region)	Support	We also believe that Policy 3/13 suggests there is presumption against taller structures anywhere in the city and that such structures will only be permitted when it can clearly be demonstrated that they will not result in harm to any of the 6 categories set out within the policy (as suggested in paragraph 1.4.1 of the document).	Comments noted.	
Bullet 2				
6604	Object	-Profit not mentioned as an aim -Council have not listened to locals, since every resident I know in Cambridge is deeply unhappy with the developments -Please stop ruining our gorgeous city with these ugly city blocks. This is an ancient university city, not Manchester.	Comments noted.	
6652	Object	There should be a height restriction for buildings, rather than saying that tall buildings should fit in with the character. Cambridge is not a tall city and risks being spoiled by taller constructions.	Comments noted. The guidance is not intended to set new policy and cannot dictate maximum heights. New policy can only be delivered through the Local Plan review process.	

Representations	Nature	Summary of Main Issue	Council's Assessment	Action
1.5 Definitions of tall building	igs and sk	yline		
6693	Object	The text describes how 'new buildings which are significantly taller than their neighbours will only be permitted if they will not detract from local residential amenity, ancient monuments and their settings, key vistas' etc etc. Yet in the space of just a few years, the area particularly around Hills Road and the Station area has become inundated by buildings that are inappropriate for the scale of the surrounding buildings (eg the massive new building at the Hills Road/Station Road junction, the forthcoming development on the 'Tim Brinton' site) having a mass that completely shrouds both people and buildings, and in the case of plans currently under review for land adjoining Hills Road Bridge by Unex House, or the additional storeys to the Kaleidoscope development, create a horrendous 'cavern' effect. The 'Belvedere' was built as 'one-off', a landmark building, yet it now seems to be the reference point for the surrounding area as to how high developers can expect to design their buildings whether for domestic or commercial purposes. Such buildings are entirely removed from the apparent guidance that aims for new buildings to be 'appropriate to context and contribute positively to both near and distant views'.	Comments noted.	

Representations	Nature	Summary of Main Issue	Council's Assessment	Action
6700 - Park Street Residents' Association (PSRA)	Object	All of Section 1.5 (paras 1.5.1 to 1.5.5 inclusive). OBJECT. if the Cambridge Skyline Guidance is to have any use as a material consideration when the council reviews planning applications in the context of Policy 3/13 of the Cambridge Local Plan (2006), the guidance must be clearly and unambiguously stated. In particular, the definitions of the terms "tall building and "skyline" must be very carefully written especially as the very first specific objective of the Guidance (Para 1.4.2) will be to provide a definition of 'tall buildings' for Cambridge. In particular	The definition of "tall buildings" used within the document is taken from nationally accepted and frequently cited documents e.g. by CABE/English Heritage; this guidance is widely accepted, used, quoted and sufficient for the purpose of this guidance. The definition of "skyline" is less well defined within similar planning documents, if indeed it is described at all. Generally a city skyline comprises a grouping of buildings, structures and landform viewed against the horizon viewed from long (or possibly medium) distance views. However the level nature of Cambridge and its surroundings restricts the number of long and medium distance views of the city skyline. Conversely, the city has an unusually large number of open spaces within very close proximity to its core. Thus some of the iconic skyline views of the city are local, even short distance, views, for example from 'The Backs' looking towards Kings College Chapel. The final sentence in section 1.5.4 referring to skyline shall be removed, as it is too loose. A better-refined definition will be prepared and will note that a view of the city "skyline" is possible from both distant and local points.	Remove the final sentence of section 1.5.4 referring to skyline, as it is too loose. A better-refined definition will be prepared and will note that a view of the city "skyline" is possible from both distant and local points.

Representations	Nature	Summary of Main Issue	Council's Assessment	Action
1.5.1				
6701 - Park Street Residents' Association (PSRA)	Object	1.5.1 OBJECT. We note that the 'Guidance on Tall Buildings' note published by English Heritage and CABE that is referred to here states that "It is not considered useful or necessary to define rigorously what is and what is not a tall building". However, we believe that the guidance for Cambridge does need to provide a clearer and less ambiguous definition than that offered if it is to contribute to the " robust set of criteria to assess applications against with a view to preserving the special character of Cambridge." referred to in para 2.3.2.	The definition of "tall buildings" used within the document is taken from nationally accepted and frequently cited documents e.g. by CABE/English Heritage; this guidance is widely accepted, used, quoted and sufficient for the purpose of this guidance. The definition of "skyline" is less well defined within similar planning documents, if indeed it is described at all. Generally a city skyline comprises a grouping of buildings, structures and landform viewed against the horizon viewed from long (or possibly medium) distance views. However the level nature of Cambridge and its surroundings restricts the number of long and medium distance views of the city skyline. Conversely, the city has an unusually large number of open spaces within very close proximity to its core. Thus some of the iconic skyline views of the city are local, even short distance, views, for example from 'The Backs' looking towards Kings College Chapel. The final sentence in section 1.5.4 referring to skyline shall be removed, as it is too loose. A better-refined definition will be prepared and will note that a view of the city "skyline" is possible from both distant and local points.	Remove the final sentence of section 1.5.4 referring to skyline, as it is too loose. A better-refined definition will be prepared and will note that a view of the city "skyline" is possible from both distant and local points.
1.5.2				
6342	Object	Be aware of Sir Hugh Casson's five principles for assessing applications for tall buildings in Oxford	Comments noted. This document along with others was reviewed as part of the background research for the skyline guidance.	
6822 - Park Street Residents' Association (PSRA)	Support	1.5.2 We SUPPORT the use of heights in metres above ground level when referring to tall buildings with a reference (in brackets perhaps) to what this equates to in storeys or floors as in this para.	Comments Noted.	

Representations	Nature	Summary of Main Issue	Council's Assessment	Action
1.5.3				
6682 - unex holdings limited	Object	The value of this document will potentially be undermined if there is no clear definition of what actually constituents a tall building. The wording of Policy 3/13 is vague and imprecise. The term "significantly" is open to interpretation and the definition of skyline, in paragraph 1.5.4, is so wide as to be meaningless. To be of benefit the guidance document should take matters forward. If the guidance document simply adopts the definition of "any structure that breaks the existing skyline" and "is significantly taller than the surrounding built form" there is a real danger that this guidance will be seen as an attempt to keep the architecture of Cambridge low and avoid any tall buildings. This would be a missed opportunity. For this guidance to have a value and a purpose it should be the result of a far more detailed study which leads to the determination of a far more precise definition of a tall buildings. The council's existing Development Control Policies are in place to deal with general development. This guidance should not try to replicate that. The Council should determine an actual building height, or number of storeys (which should not be less than 10 storeys), as the definition of a tall building.	Comments noted. The term significant must be considered on a case by case basis. As examples, a four-storey building next to a two-storey building could be considered significant (though something like the roof form, whether flat, pitched or otherwise could impact such a finding). However, a 10-storey building next to an eight-storey building may not be considered significant. Thus the conclusion of what is considered "significant" is entirely dependent on what and where it is proposed. Therefore, to enable appropriate flexibility of the guidance and to allow for proper interpretation of each case, a specific definition of "significant" is not proposed.	
6608	Object	"significantly taller than the surrounding built form". Again, feel that this is open to interpretation and therefore vague. Is it really not possible to ascribe more objective criteria to this?	Comments noted. The term significant must be considered on a case by case basis. As examples, a four-storey building next to a two-storey building could be considered significant (though something like the roof form, whether flat, pitched or otherwise could impact such a finding). However, a 10-storey building next to an eight-storey building may not be considered significant. Thus the conclusion of what is considered "significant" is entirely dependent on what and where it is proposed. Therefore, to enable appropriate flexibility of the guidance and to allow for proper interpretation of each case, a specific definition of "significant" is not proposed.	

Representations	Nature	Summary of Main Issue	Council's Assessment	Action
6785 - Cambridge Past, Present & Future	Object	1.5.3 Definition of tall building gives the emphasis on Skyline, which is not the only issue but moreover the issue of local impact on the character of the surrounding area.	The definition follows guidance prepared by both English Heritage and CABE. The wording of Policy 3/13 cannot be changed until the Local plan review is undertaken.	

Representations	Nature	Summary of Main Issue	Council's Assessment	Action
6703 - Park Street Residents' Association (PSRA)	Object	(a) Is the meaning of the word "skyline" sufficiently clear? The glossary (page 52) defines 'skyline' thus: "An outline of land and buildings defined against the sky: the skyline of the city." However, para 1.5.4 states "For the purposes of this guidance a 'skyline' can be defined as one being seen from distant and proximate, level and elevated views across the city." Which of these definitions of 'skyline' is to be incorporated in the guidance? Neither seems entirely satisfactory. The glossary version is too vague. While in para 1.5.4, the words " can be defined" invites the reader (developer) to suggest alternatives. It would be better to say " is defined". (b) Is the meaning of the word 'significantly' clear enough? It is not defined in the glossary. What is significantly taller to one may not be to another. We suggest that the word 'significantly' should be deleted. We support the comparison with the surrounding built form but retaining the modifier "significantly" is an invitation to developers and their lawyers to argue for an increase in height. We are very concerned that the guidance should enable the council to resist "height creep" in the background built form and its effect on the skyline. (c) Is the meaning of the word 'surrounding' sufficiently clear? It is not defined in the glossary. It is imprecise and invites argument as to its meaning. Does it mean adjacent and if not how far away? We hope to be forgiven for dwelling at length on the definition of 'tall building' but we believe this to be important in contributing to the ' robust set of criteria' which will be used by developers, officers, residents, and members of the planning committee. We are especially concerned about what might be described as 'height creep' where approval of a building that approaches or just breaks the skyline will make it more difficult to resist a building that goes a bit further. There are several examples in the PSRA area e.g. Beaufort Place, parts of the Quayside development, the 11 modern hous	Comments noted. The term significant must be considered on a case by case basis. As examples, a four-storey building next to a two-storey building could be considered significant (though something like the roof form, whether flat, pitched or otherwise could impact such a finding). However, a 10-storey building next to an eight-storey building may not be considered significant. Thus the conclusion of what is considered "significant" is entirely dependent on what and where it is proposed. Therefore, to enable appropriate flexibility of the guidance and to allow for proper interpretation of each case, a specific definition of "significant" is not proposed.	

Representations	Nature	Summary of Main Issue	Council's Assessment	Action
		and the Castle Hill area.		
6343 6563 6702 - Park Street Residents' Association (PSRA)	Object	Objections to the proposed definitions for "skyline" and "tall building"	Comments noted. The definition of "tall buildings" used within the document is taken from nationally accepted and frequently cited documents e.g. by CABE/English Heritage; this guidance is widely accepted, used, quoted and sufficient for the purpose of this guidance. The definition of "skyline" is less well defined within similar planning documents, if indeed it is described at all. Generally a city skyline comprises a grouping of buildings, structures and landform viewed against the horizon viewed from long (or possibly medium) distance views. However the level nature of Cambridge and its surroundings restricts the number of long and medium distance views of the city skyline. Conversely, the city has an unusually large number of open spaces within very close proximity to its core. Thus some of the iconic skyline views of the city are local, even short distance, views, for example from 'The Backs' looking towards Kings College Chapel. The final sentence in section 1.5.4 referring to skyline shall be removed, as it is too loose. A better-refined definition will be prepared and will note that a view of the city "skyline" is possible from both distant and local points.	Remove the final sentence of section 1.5.4 referring to skyline, as it is too loose. A better-refined definition will be prepared and will note that a view of the city "skyline" is possible from both distant and local points.

Representations	Nature	Summary of Main Issue	Council's Assessment	Action
6740 - Beacon Planning Ltd	Object	The definition of 'tall' buildings also seems to change within the document. The definition of a tall building (in 1.5.3) to be used in the guidance is stated as being 'any structure that breaks the existing skyline and/or is significantly taller than the surrounding built form' seems 'woolly' and open to wide interpretation as it fails to define 'significantly'.	Comments noted. The definition of "tall buildings" used within the document is taken from nationally accepted and frequently cited documents e.g. by CABE/English Heritage; this guidance is widely accepted, used, quoted and sufficient for the purpose of this guidance. The definition of "skyline" is less well defined within similar planning documents, if indeed it is described at all. Generally a city skyline comprises a grouping of buildings, structures and landform viewed against the horizon viewed from long (or possibly medium) distance views. However the level nature of Cambridge and its surroundings restricts the number of long and medium distance views of the city skyline. Conversely, the city has an unusually large number of open spaces within very close proximity to its core. Thus some of the iconic skyline views of the city are local, even short distance, views, for example from 'The Backs' looking towards Kings College Chapel. The final sentence in section 1.5.4 referring to skyline shall be removed, as it is too loose. A better-refined definition will be prepared and will note that a view of the city "skyline" is possible from both distant and local points.	Remove the final sentence of section 1.5.4 referring to skyline, as it is too loose. A better-refined definition will be prepared and will note that a view of the city "skyline" is possible from both distant and local points.
6663	Object	In the working definition the word "significantly" should be removed. I support the comparison with the surrounding built form but keeping the modifier "significantly" is an invitation to developers and their lawyers to argue for an increase in height. I am very concerned about preventing "height creep" in the background built form and its effect on the skyline.	Comments noted. The term significant must be considered on a case by case basis. As examples, a four-storey building next to a two-storey building could be considered significant (though something like the roof form, whether flat, pitched or otherwise could impact such a finding). However, a 10-storey building next to an eight-storey building may not be considered significant. Thus the conclusion of what is considered "significant" is entirely dependent on what and where it is proposed. Therefore, to enable appropriate flexibility of the guidance and to allow for proper interpretation of each case, a specific definition of "significant" is not proposed.	

Representations	Nature	Summary of Main Issue	Council's Assessment	Action
6741 - Beacon Planning Ltd	Object	Paragraph 1.5.6 then and states that the guidance will come into effect within the historic core for a building of 7 storey (and also 22m), but also between 4 and 6 storeys (no height stated) 'dependent upon exact location'. There is no reference here to the context so even if the proposed building was to be the same height (or even potentially lower) than 'surrounding built form' the guidance would seem to apply. This seems unreasonable and unnecessary. Within the suburbs 5 storeys (16m) becomes the height at which the guidance would apply, but without any reference to the context of the proposed building.	Comments noted. The text for the height triggers will be amended for the assessment criteria and will now state six storeys AND above for the Historic Core and four storeys AND above for the suburbs. In some cases the criteria could be applied at lower heights, the trigger therefore still requires some flexibility.	Amend paragraph 1.5.6 to state buildings heights of six storeys AND above for the Historic Core and four storeys AND above for the suburbs will be used to trigger the assessment criteria.
6603	Object	Cambridge is now beginning to resemble London, particularly round the station area, where high buildings are starting to dominate the skyline. Apart from being a genuine eyesore, the infrastructure in Cambridge cannot cope with the number of individuals who will be living within half a mile of the station, nor with the high-rise office buildings, such as the one currently being built by the war memorial. I strongly object to the idea that this city should have more tall buildings, which are not in character, and are detrimental to Cambridge.	Comments noted.	
6513	Support	(Submitted on behalf of the Nineteen Acre Field RA) We approve this recommendation, especially the emphasis on context rather than absolute height.	Comments noted.	
1.5.4				
6739 - Beacon Planning Ltd	Object	There seems to be some confusion about the definition of 'skyline'. The definition set out in para 1.5.4 defines skyline as 'one being seen from distant and proximate, level and elevated views across the city. The definition in the appendix is 'an outline of land and buildings defined against the sky: the skyline of the City'. This appears to be so all encompassing that every significant development would have an impact upon the skyline.	Comments noted. The definition of skyline will be refined.	Amend the definition of skyline to 'Generally a city skyline comprises a grouping of buildings, structures and landform viewed against the horizon viewed from long (or possibly medium) distance views. However the level nature of Cambridge and its surroundings restricts the number of long and medium distance views of the city skyline.'

Representations	Nature	Summary of Main Issue	Council's Assessment	Action
6690 - unex holdings limited Object	Object	The definition of "skyline" is so wide as to render the document meaningless. This document could, and should, be a great design tool and source of reference for architects and developers. For that to be the case, however, it needs to be credible and to be based on a through and detailed research study. If present the definition of skyline covers every possible angle and position from which any tall could be viewed.	Comments noted. The definition of skyline will be refined. The document highlights the importance of views within the historic core and in particular from open spaces associated with the River Cam corridor and historic core. Individual views can be identified as part of the pre-application process with the applicant.	Amend the definition of skyline to 'Generally a city skyline comprises a grouping of buildings, structures and landform viewed against the horizon viewed from long (or possibly medium) distance views. However the level nature of Cambridge and its surroundings restricts the number of long and medium distance views of the city skyline.'
		For the guidance to be of true worth and merit a detailed study should be carried out to identify the existing important/historic architecture, spaces and views. This should then lead to the identification of important view corridors in which tall buildings will be subject to greater scrutiny.		
		There is a danger that the purpose and value of the guidance document will be undermined if it appears to be adopting an approach which effectively applies to any building which is taller than its neighbour or which can be seen against the sky when viewed from any angle including street level adjacent to the building. It is difficult to imagine any building, which would not come within that range.		
		At present, unfortunately, the document appears to be a "catch all" rather than a genuinely useful guidance document.		
6514	Support	(Submitted on behalf of the Nineteen Acre Field RA) We agree this definition.	Comments noted.	
1.5.5				
6854 - South Cambridgeshire District Council	Object	Concern that the guidance does not define the historic core boundary.	Comments noted. The guidance will include a definition of the historic core (as detailed in the Councils "Core Area Appraisal") and will be included on all maps and plans.	Include the boundary of the historic core on all maps and plans.

Representations	Nature	Summary of Main Issue	Council's Assessment	Action
1.5.6 - When will the guide	ance be app	olied		
6664	Object	I would like the guidance to be applied to any structure that is taller or more massive than its surroundings.	Comments noted. Revised threshold limits have been provided within the document.	
6683 - unex holdings limited	Object	There appears to be an inconsistency between the board, and rather vague, definitions in paragraph 1.5.3 and 1.5.4 and the specific storey heights set out in this paragraph. Although the setting of specific storey heights, as a definition of a tall building is welcomed as the correct approach, the suggestion that any 5 storey outside of the historic core will automatically trigger the criteria of the document is a serious concern. A 5 storey building is not a tall building. It may be taller than its neighbours but it should not be the subject if assessment in accordance with the criteria set out in a tall building guidance document. If 5 storeys is deemed to be a tall building it will give the impression that Cambridge has a very parochial mentality and will potentially divert economic investment and development away from the City. There is a genuine danger that the value of this guidance document will be undermined if it is seen as superficial. As currently drafted, the impression is given that the guidance might be a tool for the council to use to reject any tall buildings and to keep everything low and non-contentious. The guidance document should not be based on generalisations and wide sweeping assumptions but should be based on a proper, detailed study, which could identify specific, important view corridors.	The threshold limits provided within the document have been revised. Five storeys could be interpreted as a tall if the surrounding buildings are generally two or 3 three storeys. The definition of "tall buildings" used within the document is taken from nationally accepted and frequently cited documents e.g. by CABE/English Heritage; this guidance is widely accepted, used, quoted and sufficient for the purpose of this guidance. The guidance makes clear that tall is a relative term in relation to buildings. The definition of "skyline" is less well defined within similar planning documents, if indeed it is described at all. The definition of skyline will be revised. Generally a city skyline comprises a grouping of buildings, structures and landform viewed against the horizon viewed from long (or possibly medium) distance views. However the level nature of Cambridge and its surroundings restricts the number of long and medium distance views of the city skyline. Conversely, the city has an unusually large number of open spaces within very close proximity to its core. Thus some of the iconic skyline views of the city are local, even short distance, views, for example from "The Backs' looking towards Kings College Chapel. The final sentence in section 1.5.4 referring to skyline shall be removed, as it is too loose. A better-refined definition will be prepared and will note that a view of the city "skyline" is possible from both distant and local points.	'Generally a city skyline comprises a grouping of buildings, structures and landform viewed against the horizon viewed from long (or possibly medium) distance views. However the level nature of Cambridge and its surroundings restricts the number of long and medium distance views of the city skyline.' Remove the final sentence in section 1.5.4 referring to skyline.

Representations	Nature	Summary of Main Issue	Council's Assessment	Action
6324 6515 6565 6609 6704 - Park Street Residents' Association (PSRA) 6736 - Windsor Road Residents Association (WIRE) committee	Object	Concerns raised the proposed 7 storeys within the historic core and 5 storeys within the suburbs used to trigger the assessment criteria are too tall.	Comments noted. The text for the height triggers will be amended for the assessment criteria and will now state six storeys AND above for the Historic Core and four storeys AND above for the suburbs. In some cases the criteria could be applied at lower heights, the trigger therefore still requires some flexibility.	Change text in paragraph 1.5.6 to state the trigger for the assessment criteria will be six storeys AND above for the Historic Core and four storeys AND above for the suburbs.
6569	Object	A first question regarding tall buildings is are they really necessary?	Comments noted. It is proposed to add to section 1.0 that developers should provide a justification for increased height within their Design and Access Statements and/ or Heritage Statements.	Add text within section 1 explaining that developers should provide a justification with submitted design and access statements/and or heritage statements.
6344	Object	Representations suggested a uniform height of 5 of more storeys should be used as a trigger for the assessment criteria for both the historic core and suburban areas.	Comments noted. There are distinct differences in height (and therefore character between the historic core and suburbs, hence the difference in height triggers should be maintained. Paragraph 1.5.6 will be revised to now state six storeys AND above for the Historic Core and four storeys AND above for the suburbs.	Change text in paragraph 1.5.6 to state the trigger for the assessment criteria will be six storeys AND above for the Historic Core and four storeys AND above for the suburbs.
6554	Object	Concerns raised the proposed 7 storeys within the historic core and 5 storeys within the suburbs used to trigger the assessment criteria are too tall.	Comments noted. The text for the height triggers will be amended for the assessment criteria and will now state six storeys AND above for the Historic Core and four storeys AND above for the suburbs. In some cases the criteria could be applied at lower heights, the trigger therefore still requires some flexibility.	Change text in paragraph 1.5.6 to state the trigger for the assessment criteria will be six storeys AND above for the Historic Core and four storeys AND above for the suburbs.
6567	Object	It is important to avoid single randomly located tall buildings and pseudo landmark buildings such as the Belvedere. This tower as suggested does not terminate views on Hills Road or Cherry Hinton Road, the later being well done by the lower adjoining block.	Comments noted.	
6473	Object	Concerns raised the proposed 7 storeys within the historic core and 5 storeys within the suburbs used to trigger the assessment criteria are too tall.	Comments noted. The text for the height triggers will be amended for the assessment criteria and will now state six storeys AND above for the Historic Core and four storeys AND above for the suburbs. In some cases the criteria could be applied at lower heights, the trigger therefore still requires some flexibility.	Change text in paragraph 1.5.6 to state the trigger for the assessment criteria will be six storeys AND above for the Historic Core and four storeys AND above for the suburbs.
6787 - Cambridge Past, Present & Future	Object	1.5.6 Will any other AAPs written - e.g. Chesterton Sidings etc thus need to refer to potential future AAPs in this paragraph	Comments noted. It is not proposed to produce any new AAPs across the City at the present time.	

Representations	Nature	Summary of Main Issue	Council's Assessment	Action
6743 - Beacon Planning Ltd	Object	1.5.6 introduces the concept of 'cherished views' - what are these?	Comments noted. References to cherished views will be removed and replaced with key views.	Amend references to the term cherished views and replace with key view
6821 - Park Street Residents' Association (PSRA)	Object	The guidance frequently refers to numbers of floors or storeys, sometimes with an accompanying height in metres: e.g. 1.5.2 "over 27m (approximately 9 floors)", 1.5.6 "a 7-storey building (22m above ground level)", "five storey buildings (16m above ground level)"; but 1.5.6 "buildings between four and six storeys may need to be evaluated" without any reference to height in metres.	Comments noted. Agree to include heights in metres. The Urban Design Team will use the Cambridge Building Heights Model to establish landmark building heights as close as practical to the actual height above finished grade	Include heights of landmark buildings in metres, based on the Cambridge Building Heights model.
		The number of storeys seems to us to be irrelevant and potentially misleading because storeys and floors have no fixed height and are not defined in the glossary or anywhere else. Secondly, the use of storeys alone appears to exclude any roof fittings or terrace. The Varsity Hotel is described as a seven story building but is in reality an eight storey building when the roof terrace and other roof fittings are included. We suggest that all places within the guidance where there is reference to height as a criterion for decision-making should refer primarily to heights in metres above ground level, optionally with reference to storeys as approximations.		
		The guidance should also state very clearly that any roof structures such as roof terrace, chimneys, flues and machinery, including lift housing, should be included as part of the height of a building.		
		If the guidance relies on storeys alone to define height there is a danger that developers will build high storeys and then insert mezzanine floors to increase floor space.		

Representations	Nature	Summary of Main Issue	Council's Assessment	Action
6824 - Park Street Residents' Association (PSRA)	Object	1.5.6 We OBJECT to the omission of heights in metres above ground level in the second sentence where reference is made to 'buildings between four and six storeys'. We ask that heights in metres above ground level be added here so that it reads ' buildings between four (12.6m) and six storeys (18.8m) above ground level within this area '	Comments noted. Agree to include heights in metres. The Urban Design Team will use the Cambridge Building Heights Model to establish landmark building heights as close as practical to the actual height above finished grade. The text for the height triggers will be amended for the assessment criteria and will now state six storeys AND above for the Historic Core and four storeys AND above for the suburbs. In some cases the criteria could be applied at lower heights, the trigger therefore still requires some flexibility.	Include heights of landmark buildings in metres, based on the Cambridge Building Heights model. Change text in paragraph 1.5.6 to state the trigger for the assessment criteria will be six storeys AND above for the Historic Core and four storeys AND above for the suburbs.
6777 - Cambridge Past, Present & Future	Object	Concerns the guidance did not identify locations for taller buildings.	Concerns noted. As noted in the draft for consultation, the guidance was not written in order to create new policy (suggesting possible locations for "tall" would in effect be creating new policy). Rather, it was prepared in order to help interpret Policy 3/13 of the Cambridge Local Plan. The review of the Cambridge Local Plan is the appropriate opportunity to consider and debate a specific "location-based" approach to tall buildings. In response to representations and in an attempt to provide greater clarity about location for "tall", it is considered that the guidance should set out the right "conditions" for increases in building height (though it must be stressed this is not new policy per se). The Urban Design Compendium (English Partnerships, 2000) sets out some useful guidance in this regard, stating that localised increases in building height can be desirable in areas such as at local nodes ("focal points of urban activity"), city junctions, at the ends of vistas, to mark key corners, and at transport junctions. The guidance will be revised to make reference to where localised increases in height may be suitable.	Reference areas where localised increases in height would be desirable, for example at key nodes, city junctions, ends of vistas, to mark key corners and at transport junctions (as detailed in The Urban Design Compendium, English Partnerships, 2000).
6566	Support	The idea of zoning area for tall building leading to excessive pressure for development is understandable. Zoning however is a way of directing any pressure for tall buildings were they are most acceptable or even produce good townscape. This has already happened in the station and Hills road area and there may be other areas suitable for a concentration of higher buildings.	Comments noted. "Zones" e.g. local nodes, etc., will be set out as possible "conditions" for tall buildings as noted earlier e.g. at local nodes, city junctions, at the ends of vistas, to mark key corners, and at transport junctions. Beyond this, stating specific locations and their boundary limits is not appropriate at this stage and should be considered as part of the Local Plan review.	

Representations	Nature	Summary of Main Issue	Council's Assessment	Action
6823 - Park Street Residents' Association (PSRA)	Support	1.5.6 We SUPPORT the use of heights in metres and what this equates to in storeys as in the first third sentences of this para but	Comments noted.	
6589 - English Heritage (East of England Region)	Support	Suggested structures, which are over 20m and located within a conservation area, would form a logical trigger point. The Government's Circular 01/01: Arrangements for Handling Heritage Applications - Notification and Directions by the Secretary of State, requires Local Planning Authorities to consult English Heritage on structures over 20m tall and located within a conservation area. The reference to the number of floors should be omitted as floor to floor heights vary widely. Suggestion that suburban areas could have a trigger level of 15m.	Comments noted. Suggestion welcome, however the suggested height triggers are more specific, and so appropriate, to the Cambridge condition. Disagree with omitting the reference to floors as number of floors does act as a good benchmark to most people.	
1.6 Process of preparation				
6786 - Cambridge Past, Present & Future	Object	1.6.1 Seminar held by CambridgePPF was supported not by the Royal Society but by the RSA and University of Cambridge	Comments noted. The text will be revised to reflect the comments.	Amend paragraph 1.6.1, second bullet point to read with support from the Royal society of Arts and University of Cambridge'

Representations	Nature	Summary of Main Issue	Council's Assessment	Action
2.0 Background				
2.1 Reasons for preparing	guidance			
6474	Object	2.1 - To avoid uncertainty, there should be a definition of the precise area and boundaries of what is the 'historic centre'	Comments noted. The historic core boundary (as shown on the City Council's Core Area Appraisal) will be included in all final figures. A definition of the Historic Core is given with the appendix as part of the central conservation area.	Amend figures to include the boundary of the Historic Core.
2.1.1				
6657	Object	The historic core of Cambridge extends further than suggested. Within Cambridge there are many layers of history e.g. characterful Victorian houses with gardens were demolished and replaced with the Belvedere - which is far too high and has set a huge precedent for the city. Tall buildings should be placed in locations where they can be set back from the roads, and not where there is a tradition of lower level building. Impact on existing Conservation Areas should be prevented, and existing wildlife corridors/green space areas including Botanical Gardens & Grantchester Meadows should be protected from visual intrusion.	The historic core area has been identified within the document 'Historic Core Appraisal' produced by Cambridge City Council and available on the web at: http://www.cambridge.gov.uk/ccm/content/planning-and-building-control/historic-environment-and-trees/historic-core-appraisal.en The historic core forms part of the Central Conservation Area. The extent of the historic core was defined to ensure the key university and college buildings were included, effectively covering the majority of the 18th century extent of the city.	
6705 - Park Street Residents' Association (PSRA)	Support	2.1.1. COMMENT. Please note that the Varsity Hotel is in Thompson's Lane and not in Thompson Street.	Comments noted. Paragraph 2.1.1 will be amended to read "the Varsity Hotel on Thompson's Lane".	Amend Paragraph 2.1.1 to read Thompson's Lane, not Thompson's Street.
6665	Support	The new buildings you mention seem to be very unpopular. I think in general they are inappropriate for Cambridge, too large and too grandiose for a hitherto "modest" city.	Comments noted.	

Representations	Nature	Summary of Main Issue	Council's Assessment	Action
2.1.2				
6352	Support	Tall buildings can improve the aesthetic qualities of a city. Opposition to tall buildings by individuals and conservation groups will be lessened if proposals come forward involving iconic architecture, high-profile architects and high-quality design. Cambridge has some excellent architecture from each of the last ten centuries. It deserves excellent new architecture in the twenty-first century - and that could include tall buildings. The Draft Guidance should make the point that tall buildings could make very positive contributions to the architectural richness of Cambridge when carefully planned and designed and that the Guidance is intended to ensure such outcomes.	Support noted.	
2.2 Policy and literature re	eview			
6480 - Cambridge City Council Design and Conservation Panel	Object	Need. As the current CABE/English Heritage guidance on tall buildings and the new Setting of Heritage Assets guidance released this month by English Heritage are material considerations in the determination of applications, the Panel questioned the need for additional guidance at this time, particularly as it does not make site-specific suggestions. However, the Panel noted that the opportunity to identify potential development opportunities for tall buildings may be best left to be considered in the preparation of the City's next Local Plan.	Comments noted. The national documents do have a material consideration however it was felt specific guidance relevant to the Cambridge Context was required.	1
6853 - South Cambridgeshire District Council	Object	The Leeds and Nottingham 'best practice' documents identified in the draft document list strategic issues and illustrate the conceptual thinking behind its skyline proposal. The Cambridge document would benefit from a similar approach to increase clarity for developers in directing their development proposals. Such a concept should embrace the views of the skyline of Cambridge, both from within and without the city. The use of exemplary illustrations to illustrate this would further assist developers in addressing the sensitive and emotive issue of the city's skyline.	Comments noted. Leeds and Nottingham are different to Cambridge, they are larger cities with a larger population and more diverse topography. Critically both documents are SPDs, forming part of a wider urban design strategy for the cities and are in effect promoting tall buildings in certain locations of the city. The guidance note is not intended to promote tall buildings but instead provide a better interpretation of Policy 3/13. The final version of the document will show illustrations	1

Representations	Nature	Summary of Main Issue	Council's Assessment	Action
6475	Object	2.2 - We think the proposed trigger points are confusing and potentially ambiguous, with trigger points ranging from 4 to 7 storeys and different heights; all this without any clarification of precisely where and how the differing trigger points will be applied. Thus these proposed trigger points do not achieve the aims of the policy. We think the definition should be clearer and simpler and suggest any building above 5 storeys should trigger the criteria. While meeting the criteria might be seen as demanding on the developer, we believe that applying them in more situations would provide much more information and lessen the level and validity of objection from concerned local people. This might then take out some of the lengthy and confrontational arguments that so often happen with the present approach. In other words, getting it right up front, would ease and speed the subsequent process. We are not against tall buildings in principle and so support the view that in the right location and with the right standard of high quality design and appearance, tall buildings can play a valuable role in the city. Given their prominence, it is particularly important that those standards are required of all developers. It would add greatly to the policy if there was some clearer guidance as to where tall buildings might best be situated (and where they should not be situated.	Comments noted. There are distinct differences in height (and therefore character between the historic core and suburbs, hence the difference in height triggers should be maintained. Paragraph 1.5.6 will be revised to now state six storeys AND above for the Historic Core and four storeys AND above for the Historic Core and four storeys AND above for the suburbs. As noted in the draft for consultation, the guidance was not written in order to create new policy (suggesting possible locations for "tall" would in effect be creating new policy). Rather, it was prepared in order to help interpret Policy 3/13 of the Cambridge Local Plan. The review of the Cambridge Local Plan is the appropriate opportunity to consider and debate a specific "location-based" approach to tall buildings. In response to representations and in an attempt to provide greater clarity about location for "tall", it is considered that the guidance should set out the right "conditions" for increases in building height (though it must be stressed this is not new policy per se). The Urban Design Compendium (English Partnerships, 2000) sets out some useful guidance in this regard, stating that localised increases in building height can be desirable in areas such as at local nodes ("focal points of urban activity"), city junctions, at the ends of vistas, to mark key corners, and at transport junctions. The guidance will be revised to make reference to where localised increases in height may be suitable.	Change text in paragraph 1.5.6 to state the trigger for the assessment criteria will be six storeys AND above for the Historic Core and four storeys AND above for the suburbs. Areas will be referred to where localised increases in height would be desirable, for example at key nodes, city junctions, ends of vistas, to mark key corners and at transport junctions (as detailed in The Urban Design Compendium, English Partnerships, 2000).

Representations	Nature	Summary of Main Issue	Council's Assessment	Action
6588 - English Heritage (East of England Region)	Support	The document makes reference to the potential negative impact that taller buildings might have on the setting of historic buildings, but what it fails to mention is the requirement contained in national policy, as set out in PPS 5, in considering such harm. Taller structures impacting on the setting of a heritage asset may cause harm or substantial harm to the significance of that asset. Policy HE 9.1 of PPS 5 states:	Comments noted. Reference to Planning Policy Statement 5 Policy HE 9.1 will be added to section 2.2.	Amend text to reference PPS 5 Policy HE 9.1
		'Significance can be harmed or lost through alteration or destruction of the heritage asset or development within its setting. Loss affecting any designated heritage asset should require clear and convincing justification, Substantial harm to or loss of a grade II listed buildingshould be exceptional. Substantial harm to or loss of designated heritage assets of the highest significance should be wholly exceptional.'		
		Many of the historic buildings in Cambridge are of the highest significance, being either scheduled monuments, or Grade I or Grade II* listed buildings and impacts on their setting will need to be considered in the light of this policy.		
2.2.1				
6744 - Beacon Planning Ltd	Object	2.2.1 You refer to the 'Guidance on Tall Buildings' note prepared by English Heritage. In addition English Heritage has also published 'The Setting of Historic Assets' (2011) which is also considered to be relevant.	Comments noted. 'The setting of Historic Assets' (2011) will be referenced.	Reference 'The setting of Historic Assets' (2011) within the guidance.

Representations	Nature	Summary of Main Issue	Council's Assessment	Action
2.2.2				
6706 - Park Street Residents' Association (PSRA)	Support	2.2.2. COMMENT. Reference is made to guidance on tall buildings and the skyline and to 'specific policies' produced by other local authorities including several with what might be described as 'historic' skylines e.g. Oxford, and Edinburgh but no details are given. It would be helpful to know what use has been made of the guidance produced by these authorities.	Comments noted. Oxford City Council has adopted a robust policy of rejecting tall buildings across the City. It was decided by Cambridge City Council members with the support of officers that this was not a policy Cambridge wished to follow. The opportunity to review this will emerge as part of the on-going Local Plan review, which has recently commenced. Edinburgh City Council defines protected views across the city. Cambridge City Council did not support the use of protected views within the 2006 Local Plan. This guidance can not redefine policy.	
2.2.3				
6745 - Beacon Planning Ltd	Object	2.2.3 interesting as they are, we are far from convinced that documents about Cambridge produced over 60 years ago are necessarily relevant today. More relevant is the substantial amount of development around the city that will change its setting, especially when viewed from higher ground.	Comments noted. The main references to Sharpe's work within Chapter 3 have been moved to an appendix. However the short reference to Sharpe in Section 2.2.3 is appropriate.	
6707 - Park Street Residents' Association (PSRA)	Support	2.2.3 COMMENT. Reference is made to two important pieces of work on the subject of tall buildings in Cambridge by Holford & Wright in 1950 and by Sharp in 1963 and that " both documents reveal that concerns over tall buildings in Cambridge are nothing new." We wonder in that case why greater attention was not given to this matter when Policies 3/2, 3/4 and 3/13 of the Cambridge Local Plan (2006) were written and why the reference to 'cones of view' was removed from the Local Plan? (See also 3.14.2 below).	Comments noted. The cones of view shown in the 1996 Cambridge Local Plan were omitted in the 2006 Local Plan following a review by the government Inspector examining the Plan at the time. The view cones were not considered sufficiently robust or defensible, and so were dropped in the 2006 Local Plan. The London View Management Framework SPG 2010 establishes protected views, however this is a very substantial document which has required a highly technical appraisal process the expertise of external consultants. Such a framework is not considered necessary, or beneficial, in the case of Cambridge given its much smaller scale and generally low height in comparison to London.	

Representations	Nature	Summary of Main Issue	Council's Assessment	Action
6590 - English Heritage (East of England Region)	Support	Paragraph 2.2.3 notes that concerns over tall buildings within Cambridge are not new, but there is no analysis as to whether the pressure for tall buildings is now greater and, if so, what is driving that pressure It might also be appropriate to consider the environmental implications of taller buildings, assessing their likely need for increased servicing (including high speed lifts etc) and balancing that against the sustainable benefits of locating residential and employment accommodation at transport hubs (ie Cambridge Station).	Comments noted. Despite the downturn there is still a significant pressure for development in Cambridge where land values and land is restricted by the greenbelt. Developers have a wish to increase height to maximise value.	
2.2.4				
6610	Object	Development could improve the biodiversity, connectivity and amenity of urban edge as it contains largely intensively farmed land at present. Southern fringe developments will be proof of this.	Comments noted.	
		Tall buildings need to identify and respond positively to existing features - I would argue that in most cases this has not been achieved and therefore am concerned that there is little precedent for this otherwise noble aspiration.		
6708 - Park Street Residents' Association (PSRA)	Support	2.2.4 'Setting the context' and 2.2.5 'Responding to context' . SUPPORT.	Comments noted.	
Paragraph 1				
6654 - North Newnham Res.Ass	Support	On behalf of the NNRA (North Newnham Residents's Association), we support this policy. As the West Cambridge site develops- (planning permission given 1999)- some residents think the existing scheme could, however, be better scrutinised against these aspirations. A large area will become defined by the West Cambridge skyline including the public footpaths to the South, (back of Rugby ground) East, (Coton Hill) and West of the site. Not sure how biodiversity, connectivity and amenity are measured & improved? Mrs P Heath. Chair NNRA	Comments noted.	

Representations	Nature	Summary of Main Issue	Council's Assessment	Action
2.3.1				
6694 6710 - Park Street Residents' Association (PSRA)	Object		Comments noted.	
6709 - Park Street Residents' Association (PSRA)	Support	2.3.1 We SUPPORT the need for a more proactive "strategy" to avoid a piecemeal approach. The current approach to planning in the city appears to us to lack any semblance of a strategy, with each application seeming to be considered alone and without any reference to the needs of the city as a community.	Support noted.	
6667	Support	I support the use of the phrase taller buildings. I would ask for it to be used elsewhere in the guidance in place of tall buildings to keep the focus on avoiding height creep in the background built form. The last sentence in this otherwise excellent discussion would be more truthful if it used the word "taller" instead of "tall." I ask why have you used tall in the rest of the document?	Comments noted.	

Representations	Nature	Summary of Main Issue	Council's Assessment	Action
2.3.2 6348 6746 - Beacon Planning Ltd 6778 - Cambridge Past, Present & Future	Object	Concerns the guidance did not identify locations for taller buildings.	Concerns noted. As noted in the draft for consultation, the guidance was not written in order to create new policy (suggesting possible locations for "tall" would in effect be creating new policy). Rather, it was prepared in order to help interpret Policy 3/13 of the Cambridge Local Plan. The review of the Cambridge Local Plan is the appropriate opportunity to consider and debate a specific "location-based" approach to tall buildings. In response to representations and in an attempt to provide greater clarity about location for "tall", it is considered that the guidance should set out the right "conditions" for increases in building height (though it must be stressed this is not new policy per se). The Urban Design Compendium (English Partnerships, 2000) sets out some useful guidance in this regard, stating that localised increases in building height can be desirable in areas such as at local nodes ("focal points of urban activity"), city junctions, at the ends of vistas, to mark key corners, and at transport junctions. The guidance will be revised to make reference to where localised increases in height may be suitable.	Areas will be referred to where localised increases in height would be desirable, for example at key nodes, city junctions, ends of vistas, to mark key corners and at transport junctions (as detailed in The Urban Design Compendium, English Partnerships, 2000).
6345	Object	While the strategy is not intended to promote tall buildings in Cambridge, I do think that the document should at some point set out the argument which can be made to justify them in principle.	Comments noted. A requirement will be added to the guidance for developers to clearly set out a justification for building taller within their Design and Access Statement and/ or Heritage Statement.	Amend text to include a requirement for developers to clearly set out a justification for building taller within their Design and Access Statement and/ or Heritage Statement.

Representations	Nature	Summary of Main Issue	Council's Assessment	Action
6684 - unex holdings limited	Object	If the document sets out "to provide an understanding of the skyline" it fall short. The study is neither thorough nor detailed but, unfortunately, is quite superficial. The document dismisses a "zoning-based" approach despite this being one of the most sensible approaches to take. The document would be more valid and credible if the approach was as follows; 1. A restrictive Policy within a specified distance of important buildings in the historic core. 2. View corridors towards important buildings and landmarks. 3. specific zones where tall buildings would be acceptable.	Comments noted. "Zones" e.g. local nodes, etc., will be set out as possible "conditions" for tall buildings as noted earlier e.g. at local nodes, city junctions, at the ends of vistas, to mark key corners, and at transport junctions. Beyond this, stating specific locations and their boundary limits is not appropriate at this stage and should be considered as part of the Local Plan review.	
		The zones should be sustainable with excellent transport links. The CB1 development and the area around the Hills Road/Brooklands Avenue, Hills Road/Cherry Hinton Road and Hills Road/Station Road would be an ideal zone, as would the area adjacent to the Grafton Centre/Elizabeth Way roundabout. By encouraging tall buildings in these zones it would allow the council to strike a balance and be much more restrictive within the historic core or in the view corridors. Land is scarce and therefore land beside transportation hubs should be maximised.		
6611	Object	Desire to avoid zoning appears to be acceptance that tall buildings act as precedent for others. Is CB1 development not evidence though that zoning is already occurring?	Comments noted. "Zones" e.g. local nodes, etc., will be set out as possible "conditions" for tall buildings as noted earlier e.g. at local nodes, city junctions, at the ends of vistas, to mark key corners, and at transport junctions. Beyond this, stating specific locations and their boundary limits is not appropriate at this stage and should be considered as part of the Local Plan review.	No proposed changes
6586 - English Heritage (East of England Region)	Support	English Heritage welcomes the acknowledgement by Cambridge City Council that the Cambridge Skyline is both important and vulnerable. It is also apparent that there is a perceived need to provide guidance on how taller structures are to be assessed in light of the Council's Policy 3/13. In providing such guidance English Heritage believes it is important to stress that it is not a 'tall buildings policy', nor is it to be seen as supporting the principal of taller buildings in the city. We therefore strongly support the sentiments expressed in paragraph 2.3.2.	Support noted.	

Representations	Nature	Summary of Main Issue	Council's Assessment	Action
6711 - Park Street Residents' Association (PSRA)	Support	2.3.2 We SUPPORT the need for a robust set of criteria to assess applications particularly in view of the fact that the review of the Local Plan, now beginning, presents an opportunity to review Policy 3/13 and that this guidance will help to feed into that process. But how robust are these criteria? See comments on Section 4 below.	Support noted.	
6444	Support	The development across Midsummer Common opposite the Eights Marina flats continues to grow. This would be bearable if the pretty cupola that used to be on the old Brunswick School had been retained. It tied in well with cupolas across Cambridge, from Emmanuel, and other colleges, to Laurie & McConnells (as was)and various churches, adding grace to this neighbourhood. Where is it now please? And could it be mounted at some strategic point in the Kite (rather like the old fountain in the market and that on Hobson's Conduit)?	Support noted. The cupola was returned to Cambridge Regional College.	
2.4 Approach in the guida	nce and wh	at needs to be managed		
6696 - Cambridge Association of Architects 6697 - Cambridge Association of Architects		Locations for tall buildings.	The review of the Cambridge Local Plan is the appropriate opportunity to consider and debate a specific "location-based" approach to tall buildings. In response to representations and in an attempt to	Add text outlining where localised increases in building height can be desirable, in areas such as at local nodes ("focal points of urban activity"), city junctions, at the ends of vistas, to mark key corner.

junctions.

In response to representations and in an attempt to provide greater clarity about location for "tall", it is considered that the guidance should set out the right "conditions" for increases in building height (though it must be stressed this is not new policy per se). The Urban Design Compendium (English Partnerships, 2000) sets out some useful guidance in this regard, stating that localised increases in building height can be desirable in areas such as at local nodes ("focal points of urban activity"), city junctions, at the ends of vistas, to mark key corners, and at transport

junctions, at the ends of vistas, to mark key corners, and at transport junctions.

Representations	Nature	Summary of Main Issue	Council's Assessment	Action
2.4.1				
6712 - Park Street Residents' Association (PSRA)	Support	2.4.1 SUPPORT. Pressure from developers to go as high as they can is already intense and the point made in the last sentence of 2.4.1 is very important: "However, given the relatively low scale nature of Cambridge, buildings of this height (between five to ten residential storeys) are still likely to have both immediate and wider impacts on the skyline." Varsity Hotel, The Belvedere Tower and Botanic House are examples.	Comments noted.	
2.4.2				
6612	Object	"Factors limiting the preparation of any new policy". I'm somewhat surprised that both Oxford and Edinburgh are able to create dedicated policies on critical areas of town planning such as this and yet the also historic town of Cambridge cannot.	The review of the Cambridge Local Plan is the appropriate opportunity to consider the Local Authority's fundamental approach to tall buildings.	
6713 - Park Street Residents' Association (PSRA)	Support	2.4.2 SUPPORT. The need for " a set of robust, practical criteria to assist in the evaluation of the likely impact of a tall building (or buildings) on the immediate and wider City skyline" is self evident.	Comments noted.	

Representations	Nature	Summary of Main Issue	Council's Assessment	Action
3.0 The Cambridge (Context			
3.0 The Cambridge Context	<u>.</u>			
6571	Object	The main need for the guidance on tall buildings is to give clear physical parameters as to what is acceptable in different urban and open space relationships. The draft guidance does not do this but only presents a checklist of factors to be considered.	Disagree. The current Policy 3/13, backed up by the new guidance, would be sufficiently rigorous when fully applied to assess tall buildings.	
6781 - Cambridge Past, Present	Object	Social coherence	Comments noted.	
& Future		Tall and massive building complexes must be designed to create 'mixed and balanced' communities in tall buildings. It has to work for those who use / live in these buildings and those who live and work nearby.		
		Any residential building needs to provide family accommodation not just small apartments. This may help a city to grow without ongoing need for the city to spread.		
		There must be a proper community consultation.		
6742 - Beacon Planning Ltd	Object	There are too many sweeping generalisations about the character of the city which are not always accurate and in the context of this guidance not helpful. For example the sentence 'many of the streets within the historic core include relatively high buildings in relation to street width providing a pronounced sense of enclosure to the street' is misleading. There are many important streets in the historic core which do not meet this description, including St Andrews St, Regent St, Bridge Street, the Market Square and Kings Parade.	The reference will be changed to 'there are several examples of streets within'. Reference will be made to streets with more open character such as Kings Parade. Reference has been made to the historic core appraisal, which notes that the major characteristic of the core are narrow and intimate streets. Section 3 has made references to Landscape Character Assessment and the LDA Character Assessment. A detailed character assessment has not been possible but applicants are referred to relevant documents including conservation area appraisals.	The reference will be changed to 'there are several examples of streets within'. Reference will be made to streets with more open character such as Kings Parade. Reference has been made to the historic core appraisal, which notes that the major characteristic of the core are narrow and intimate streets. Section 3 has made references to Landscape Character Assessment and the LDA Character Assessment.

Representations	Nature	Summary of Main Issue	Council's Assessment	Action
6570	Object	Most of section 3.0 concerns itself with the impact on city approaches and long views over the city. This is important when considering any location for a group of high buildings. It is hoped however that any proposal for single tall buildings is not approved, and that in any case if proposals are modified to suit their local context no adverse effects are made to the city panorama.	Disagree. Adequate weight is given to local views. It is not possible to list out specific local views which must be assessed on a case by case basis. However the document clearly states the importance of local views especially from open spaces adjacent to the historic core. A single tall building could be appropriate subject to design and location. Cambridge is characterised by single tall structures appearing above the background buildings and trees.	
3.1.1				
6680	Support	I agree strongly with 3.12. Cambridge core is unique and so should and must set its own criteria to preserve its look and feel. This should include the logistics of access and egress without cars. What has been done in the centre of many other cities in this country is mostly irrelevant except as a warning.	Comments noted.	
3.1.2				
6613	Object	Reference is made to the 'Inner Green Belt Boundary Study 2002'. Given the significant changes that have occurred to the city and the pressures to develop the land within it this Study seems to be a little out of date. When is the next proposed Study to take place?	Comments noted. As part of the on-going Local Plan review, which has recently commenced, an updated review of the inner greenbelt study will be commenced in 2012.	
3.2.2				
6788 - Cambridge Past, Present & Future	Object	3.2.2 Western city ridges' height need to be stipulated: North of Coton- Madingley Cemetery = 60m AOD South of Coton - Red Meadow Hill - Coton Countryside Reserve = 45m AOD	Comments noted. The AOD heights shall be added to the section	Include AOD heights within paragraph 3.2.2
3.2.3				
6591 - English Heritage (East of England Region)	Support	Paragraph 3.2.3 describes the River Cam as bisecting the city. While its course may indeed run through the middle of modern Cambridge, it effectively encircles the medieval core.	Comments noted.	

Representations	Nature	Summary of Main Issue	Council's Assessment	Action
3.5.1				
6658	Support	Please note that a recent planning application refered to the cattle market area as "the urban quarter" of Cambridge. As you will be aware this is a complete misnomer. This area is adjacent to the Brooklands Avenue conservation area, with nearby wildlife corridors created by the CUP sports field, Clare College playing fields and Empty Common. There has been much recent development in this area of Cambridge; however the 10 storey Belvedere set a precedent which should not be replicated without serious consideration. It is visible from Grantchester Meadows and has had huge detrimental impact on the skyline of Cambridge.	Comments noted.	
3.5.2				
6116 -	Object	Section 3.5.2 has little relevance, this is relevant to the inclusion of green spaces and the prevention of unchecked urban sprawl but not so relevant to tall buildings.	Disagree. The setting of the city has the potential to be affected by tall buildings especially groupings of tall buildings in the suburbs.	
6614	Object	This point mentions that "significant areas of distinctive and supportive townscape" were identified but for those who do not live in these areas can we expect to be preferentially burdened with tall buildings as a result?	Comments noted. References to distinctive townscape will be removed from the document.	Remove references to 'distinctive townscape'
3.6.2				
6747 - Beacon Planning Ltd	Object	3.6.2 describes the river corridors around the city as 'key approaches' to the city, and as a consequence 'particularly sensitive to change and in particular to taller buildings'. The river corridor shown on the 'City Approaches' plan includes areas which are clearly less sensitive than say, the Backs, where 'taller buildings' may well be appropriate.	6747 Comments noted. Text will be amended to "The River Cam corridor is particularly sensitive to new development and in particular to taller buildings owing to its open character and proximity to the historic core. As the 2003 Landscape Character Assessment notes, some of the best panoramic views of the City are afforded from the south west of the City, including Grantchester Meadows and the rising footpath to Grantchester. The Council still believe that river corridor and its strong associations with open space mean that the river corridors are particularly sensitive to change."	Amended text to read "The River Cam corridor is particularly sensitive to new development and in particular to taller buildings owing to its open character and proximity to the historic core. As the 2003 Landscape Character Assessment notes, some of the best panoramic views of the City are afforded from the south west of the City, including Grantchester Meadows and the rising footpath to Grantchester. The Council still believe that river corridor and its strong associations with open space mean that the river corridors are particularly sensitive to change."

Representations	Nature	Summary of Main Issue	Council's Assessment	Action
3.7 Green fingers and open	green spa	ces within the City		
6780 - Cambridge Past, Present & Future	Object	Impact on green spaces and waterscape The guidance must ensure that there are no tall/ massive buildings nearby or next to Commons, Registered Historic Park & Gardens and River Corridor and Green Belt areas- or even all Protected Open Spaces within the City? Impact of tall buildings on green spaces needs stronger discussion to avoid issues e.g. Varsity Hotel at Thompson Lane extreme adverse impact on Jesus Green and general city skyline. Para 3.7.1 - definition and characterisation of green fingers and commons to date insufficient and need clearer description to sustain their quality - some are more urban green spaces e.g. Jesus Green/ Midsummer Common whereby Coe Fen/ Lammas Land, New Bit, Empty Common, Ditton Meadow are more rural and their character requires much more protection. Thus the setting of the commons and green spaces need defining, protecting and enhancing. Additional important view corridors should be added - the whole length of the River Cam corridor between M11 and the A11 - in particular view corridor along Grantchester Meadows	The document cannot change policy. The criteria will ensure that tall/ bulky buildings are assessed thoroughly, in particular where they are located adjacent to open spaces. Such buildings will also need to meet the requirements of Policy 3/ 4 and 3/7.	
		(should this be made into a Protected View?) and views along commons and large green spaces adjacent to the River Cam.		
6482 - Cambridge City Council Design and Conservation Panel	Support	Green spaces. Any guidance needs to demonstrate a clear understanding of green spaces and the quality of Cambridge's Commons.	Comments noted.	
3.7.1				
6615	Support	Completely agree that the green fingers and corridors into Cambridge represent defining characteristics for the town. I would argue that for those living in the 'town' rather than 'gown' side of Cambridge that is referred to much less in the document that these spaces are of a greater immediate importance. Critically, they are of immediate use to residents and therefore form a much more useful area of green belt land than that many surrounding Cambridge.	Support noted.	

Representations	Nature	Summary of Main Issue	Council's Assessment	Action
6650 - North Newnham Res.Ass	Support	On behalf of NNRA, we support the significance of the the green finger that penetrate the City and provide long and short views. From the West Side of Cambridge there are public footpaths from which one get unusual long views of Cambridge skyline. For example: pleasing and historic vista from the west - Coton Hill, M11 - of spires and towers protruding from greenery, voicing the hope than any new development can avoid spoiling this fine feature of Cambridge. (perhaps somewhat reminiscent of the classic view of Oxford's dreaming spires from Cumnor Hill?). Penny Heath. Chair NNRA	Support noted.	
3.7.3				
6789 - Cambridge Past, Present & Future	Object	3.7.3 Botanic Garden (no s at end)	Comments noted. Botanic Gardens will be replaced with Botanic Garden	Remove "s" from Botanic Gardens within paragraph 3.7.3
6714 - Park Street Residents' Association (PSRA)	Support	3.7.3 & 3.7.4 We SUPPORT the statement that views from the city's open spaces within and surrounding the historic core are arguably the most sensitive to change within the city. This is well illustrated by views e.g. of Botanic House from the Botanic Garden and of the Varsity Hotel from Jesus Green.	Support noted.	
3.7.4				
6748 - Beacon Planning Ltd	Object	3.7.4 states that views from the city's open spaces in and around the historic core are 'arguably the most sensitive to change' but this is not substantiated. There are other views that are considered to be just as important, eg down long straight streets.	Propose to change the text to: "The combination of the open character of open space and their proximity to the historic core mean the City's open spaces are highly sensitive to change."	Amend text to "The combination of the open character of open space and their proximity to the historic core mean the City's open spaces are highly sensitive to change."

Representations	Nature	Summary of Main Issue	Council's Assessment	Action
6685 - unex holdings limited	Support	The council's assessment that "views from the City's Open Spaces within and surrounding the historic core are arguably the most sensitive to change" is correct. However, in order to protect these areas, important buildings and important views, development should be encouraged in other locations. Land is scarce and is Cambridge wants to maintain its status as an economic driver it will have to allow and encourage development. Millions have been spent in improving the transportation links in the station quarter within the guided busway and the new road link from the Hills Road/Brooklands Avenue junction. Tall buildings should be positively encouraged in this location. The additional railway station platforms have now been completed and therefore a pro-active development zone, which supports and encourages tall buildings in this location, is required. I 15 years time, if the available land has been developed with low	Comments noted. "Zones" e.g. local nodes, etc., will be set out as possible "conditions" for tall buildings as noted earlier e.g. at local nodes, city junctions, at the ends of vistas, to mark key corners, and at transport junctions. Beyond this, stating specific locations and their boundary limits is not appropriate at this stage and should be considered as part of the Local Plan review.	

rise buildings, Cambridge's economic growth will suffer and economic investment will be lost. The area adjacent to the Grafton Centre/Elizabeth Way

roundabout, with its bus interchange, should also be identified for tall buildings. By creating such tall zones, it will allow the Council to protect the City's open

spaces within and around the historic core.

Representations	Nature	Summary of Main Issue	Council's Assessment	Action
3.8 Heritage Assets 6582 - Brunswick & North Kite Residents Association (BruNK)	Nature Support	1. Views of and from the Midsummer Common area should be protected as part of the Historic Core. The significant views from MSC include: towards the Abbey area including the technology museum chimney; towards Jesus College and All Saints Church in Jesus Lane; towards the Dolls Houses on Maids Causeway and the Wesley Church on Short Street; towards the River Cam and the boat-houses on the northern bank.	Comments noted. It is not considered necessary or appropriate to list all of these view points within the document; there are simply too many to be of use, and furthermore it should be to the proponent of a tall building to agree with the Council a list of views to be provided for assessment on a case by case basis. It is worth noting that relative distance of each view is taken from the city's historic core. This will be made explicit in the text. It is stated in section 3.13.5 that local views must be considered on a case by case basis as part of the pre-application process and a list of important local views from key open spaces is given. Figure 3.6 shows a number of strategic views which, with the exception of Castle Hill, are taken from the outer edge of the city. Additional strategic	Additional strategic views from the M11 and A14 (potentially junction of A14/ A10) and a view from the River Cam looking south between the A14 and
			views from the M11 and A14 (potentially junction of A14/ A10) and a view from the River Cam looking south between the A14 and Baits Bite Lock should be included. Other long distance views from outside the city will be considered on a case by case basis. Views from private buildings including multi-storey car parks, though interesting, are not considered appropriate to include in the guidance, though such views could be provided by developers where proposals are in close proximity to such car parks.	
6573 - Natural England 6574 - Natural England	Support		Comments noted.	
6584 - Brunswick & North Kite Residents Association (BruNK)	Support	Maids Causeway, Willow Walk, New Square and Newmarket Road (west of East Road) should be included in the Historic Core Appraisal when it is updated - and BruNK should be consulted.	Support noted.	

Representations	Nature	Summary of Main Issue	Council's Assessment	Action
3.8.1				
6715 - Park Street Residents' Association (PSRA)	Object	3.8.1 OBJECT. This states that the existence of the Central Conservation Area ' has helped to preserve the character of the historic core' but it did no such thing when plans for the Varsity Hotel were approved. The need for robust criteria to prevent this sort of development in future is obvious and we suggest the inclusion of a strongly worded para here stressing the importance of preserving the character of the Historic Core Conservation Area (and of other conservation areas).	Comments noted. The protection of the historic core is inherent in Policy 3/13.	
6791 - Cambridge Past, Present & Future	Object	3.8.1 Should read Registered Historic Park & Gardens	Comments noted. The text will be amended to read 'Registered Historic Park & Gardens'	Amend text within paragraph 3.8.1 to read 'Registered Historic Park & Gardens'
6616 6790 - Cambridge Past, Present & Future	Object		Comments noted.	
Bullet 2				
6617	Support	Will the Riverside conservation area be included in this Guidance if it is accepted?	An addendum to the guidance can be added when and if the Riverside Conservation Area is adopted.	
3.9.2				
6618	Support	Comment is made here that high buildings can create a "sense of enclosure" which is one of the few instances in this document that is an acknowledgement of the other factors that need to be considered when tall building proposals are considered.	Support Noted.	
3.9.4				
6619	Object	Acknowledgement that the West of Cambridge is far less densely developed than the East and North areas. Presumably this has been due in part to a reluctance or inability to develop these areas (e.g. "cherished views" etc) that could drive the north and east to suffer the excesses of future overdevelopment.	Comments noted. Section 3.9.4 is merely an objective statement. The eastern edge of the city has been developed at higher densities since the mid 19th century.	

Representations	Nature	Summary of Main Issue	Council's Assessment Action
3.9.8			
6592 - English Heritage (East of England Region)	Support	Paragraph 3.9.8 suggests that the station area retains a sense of its industrial past. Regrettably that is now largely lost and aside from Foster's Mill all other vestiges of the historic rail yards, cattle market et cetera have been removed.	Comments noted.
3.10 Movement corridors, o	approache	s and gateways	
6716 - Park Street Residents' Association (PSRA)	Support	Section 3.10 Movement corridors, approaches and gateways. There is much that we SUPPORT here but great care must be taken to ensure that the link between the historic core and its 'rural hinterland' is not damaged or severed.	Comments noted.
3.10.1			
6659	Object	Gateways should presage what they contain and therefore in this case be of an appropriate scale and architectural excellence. This cannot be said for any of the Cattle market development existing or proposed.	Comments noted.
		What is the rationale behind the new buildings going up and projected, at the war memorial? Is this an inner gateway? These buildings are and will be inappropriate neighbours for the adjacent Botanic Gardens.	
6620	Object	This statement appears to identify the Belvedere as a positive gateway landmark for the city. I'm not sure that most people view it in this way.	Comments noted.
6442	Object	Strongly disagree with the statement. Does not recognise or acknowledge the relatively controversial nature of recent high rise proposals. Appears to favour certain areas for future tall building development without proper explanation of strategy.	Comments noted. Buildings in these locations can help terminate views and enhance the legibility of a city which is a key urban design objective.

Representations	Nature	Summary of Main Issue	Council's Assessment	Action
6686 - unex holdings limited	Support	It is welcomed that the council recognises the value of maximising development at highly accessible locations. This will allow the most sustainable form of development. However, rather than simply expecting these locations to be found desirable by developers of tall buildings, the guidance should positively promote the development of tall buildings in these locations. It is agreed that tall buildings, or those with a considerable mass,. Can serve as positive gateways and landmarks if well designed. The triangle between the railway station, the Station Road/Hills Road junction and the Hills Road/Cherry Hinton Road junction should be positively promoted for the development of tall buildings.	Comments noted. Some additional text describing the generic characteristics of locations which may be appropriate for tall buildings will be added. This will address the importance of nodes etc, rather than specific geographical locations.	Add text outlining where localised increases in building height can be desirable, in areas such as at local nodes ("focal points of urban activity"), city junctions, at the ends of vistas, to mark key corners, and at transport junctions.
3.10.3				
6749 - Beacon Planning Ltd	Object	3.10.3 the Catholic Church is described as 'terminating views along key approaches to the city. We would describe it as an incident on views along a number of streets. Equally the Belvedere is not the terminus of long vistas. Whilst the view along Cherry Hinton Road is terminated by part of the overall development the view does not feature the 'tower'.	Comments noted. The Belvedere tower is visible from significant sections of Cherry Hinton Road as a prominent feature however it does not strictly speaking terminate the views. The text will be amended. However The Council do believe that the tower of the Catholic Church effectively terminates views along the approach roads.	Amend text within paragraph 3.10.3 outlining the Belvedere tower is visible from significant sections of Cherry Hinton Road as a prominent feature however it does not terminate the views.
3.10.4				
6793 - Cambridge Past, Present & Future	Object	River Approaches - the entire length of the River cam should be listed as special up and down-stream between M11 and A11	Comments noted. Section 3.6 Waterbodies emphasises the importance of the River Cam.	
6792 - Cambridge Past, Present & Future	Object	3.10.4 Tree-lined approaches - Also need to include Milton Road and Newmarket Road River Approaches	Comments noted. The classification of the roads is taken from a comprehensive Green Belt study undertaken by LDA.	

Representations	Nature	Summary of Main Issue	Council's Assessment	Action
6651 - North Newnham Res.Ass	Object	On behalf of NNRA, the City Suburbs & Approaches do not give enough weight or mention to the footpath and cycle path approaches into Cambridge. As the greener transport policies wish to give Pedestrian and Cycle use closer status to car use, the approach routes should perhaps reflect nonvehicular routes and list for example Coton Footpath, Garret Hostel Lane. Granchester Meadow footpath. Penny Heath. NNRA	Comments noted. Views from individual footpaths will be picked up as part of individual applications. Reference will be made to key long distance footpaths including Fen Way, Harcamlow Way and Wimpole Way. Text will be amended to highlight the importance of addressing views of footpaths.	Reference long distance footpaths including Fen Way, Harcamlow Way and Wimpole Way. Amended text to highlight the importance of addressing views of footpaths.
6750 - Beacon Planning Ltd	Object	3.10.4 it is not clear why Barton Road is identified as being particularly sensitive to change	Barton Road is included from the LDA Green Belt Study. The additional sentence in relation to sensitivity will be removed.	Remove sentence relating to sensitivity in paragraph 3.10.4.
Bullet 6				
6621	Object	Grantchester Road is mentioned as a particularly sensitive area with a "particularly strong connection between the historic core and its rural hinterland". A quick journey down Grantchester Road reveals a road flanked by field and sports grounds with high hedges either side for long stretches. I am unsure how this helps it relate to the historic core which is some distance away and cannot even be seen from Grantchester Road itself.	Comments noted. There are gaps in the hedgerow where views of the historic core are possible.	
3.10.5				
6794 - Cambridge Past, Present & Future	Object	3.10.5 Its four approached studies	Comments noted. Paragraph 3.10.5 will be amended to read "four existing 'Suburbs and Approaches' studies".	Change paragraph 3.10.5 to read "four existing 'Suburbs and Approaches' studies".
Bullet 4				
6622	Object	Newmarket Road is marked simply as a "commercial approach" whereas significant stretches of this road from the cemetery westwards to the railway bridge flyover are predominantly residential.	Comments noted.	

Representations	Nature	Summary of Main Issue	Council's Assessment	Action
3.10.6				
6795 - Cambridge Past, Present & Future	Object	3.10.6 Details of roads required here	Comments noted. The roads have been included in paragraph 3.10.6.	
3.11 Characteristics of the	City Skylir	ne		
6516	Support	(Submitted on behalf of the Nineteen Acre Field RA) What this section generally demonstrates is that even quite recent planning decisions have led to results which dominate or even intervene in one's view of the city (or a part of it). It highlights the need for greater care and caution, and shows that this policy is overdue.	Comments noted.	
3.11.1				
6070	Support	Change is inevitable and cities evolve	Comments noted.	
6593 - English Heritage (East of England Region)	Support	Paragraph 3.11.1 suggests that the skyline of Cambridge has changed over time, though these changes have until recently been relatively small scale. We would add that these modest changes have also taken place over a relatively long timescale. This is in marked contrast to the pressures of today, which if un-checked would result in rapid and major change. The sentiments expressed in this paragraph appear to be contradicted in paragraph 3.11.3, which stats that 'since Sharp's report the skyline of Cambridge has changed markedly.' That is incorrect. There have been some changes, but the skyline survives remarkably in-tact, hence the need for its continued protection. As an aside there is a need to clarify the number of stories in the Belvedere development. In paragraph 3.11.3 it is given as ten storeys, but in paragraph 3.12.1 (on page 29) it is given as eleven storeys.	Changes to the text will be made with reference to the rate of change. The detailed section on Sharpe's work has been moved to an appendix. The section has been changed to reflect that whilst the skyline has on the whole remained unchanged the construction of Addenbrookes has had a significant effect on views in addition to the growing influence of West Cambridge on local views. The height of the Belvedere will be referred to as 10 storeys measured from Hills Road.	Amend text to reference the rate of change to Cambridge's skyline. Amend the height of the Belvedere to 10 storeys.

Representations	Nature	Summary of Main Issue	Council's Assessment	Action
3.11.2				
6623	Object	I'd disagree with the statement that there are few public locations from which a panorama of the City can be seen - several have already been mentioned in this document and Shelford Road for example (between Fulbourn and Wort's Causeway) offers excellent views of the City and East Cambridge too.	Comments noted. The reference is taken directly from Thomas Sharpe.	
3.11.3				
6796 - Cambridge Past, Present & Future	Object	3.11.3 in relation to all buildings need to give heights in metres and specify if residential or commercial buildings	Comments noted. Agree to include heights in metres. The Urban Design Team will use the Cambridge Building Heights Model to establish landmark building heights as close as practical to the actual height above finished grade.	Include heights of landmark buildings in metres, based on the Cambridge Building Heights model.
6624	Object	Several buildings of note are present in East Cambridge and are outlined in the Council's own Conservation Area consultation document. A significant tall building is the Cambridge Museum of Technology chimney.	Comments noted.	
6751 - Beacon Planning Ltd	Object	3.11.3 the William Stone Building at Peterhouse is described as 'particularly prominent'. We consider this to be inaccurate as it is actually very difficult to see from many viewpoints.	Comments noted. The section will be reworded to acknowledge the screening effect of trees.	Include text acknowledging the screening effect of trees.
6717 - Park Street Residents' Association (PSRA)	Support	3.11.3 We SUPPORT Sharp's 1963 observation that the skyline of the suburbs required diversification but not domination and note that the guidance states that this observation is still valid today.	Support noted.	
3.11.4				
6625	Object	This point further emphasises the importance of the West of Cambridge and I am concerned that this significant focus on preserving the West of Cambridge will disadvantage the significant number of people living elsewhere in the City who will disproportionately suffer the consequences of tall buildings in their locality.	Comments noted. References to distinctive townscape will be removed from the document	Remove reference to distinctive townscape.

Representations	Nature	Summary of Main Issue	Council's Assessment	Action
6718 - Park Street Residents' Association (PSRA)	Support	3.11.4 and 3.11.9. We strongly SUPPORT the stress laid in each of these paras on the important contribution that trees make to the Cambridge skyline and note the threat that tall buildings make to the view of these trees from parts of the city.	Support noted.	
6679	Support	Support the importance of trees in the landscape, particularly tall trees which can only be placed in some places in the built environment. It is so necessary to think of the possibility of trees as an addition to any development.	Support noted.	
6655 - North Newnham Res.Ass	Support	One change to the skyline of West Cambridge suburbs are the tall artifical lighting posts on some sports grounds during winter months. Despite effort to mitigate light glare with tree planting-the schemes have changed the character of the area and impact on skyline views. There needs to a careful balance between important recreational benefit and the negative visual impact. The Lighting on the athletics ground Wilberforce Road is good example of unexpected changes to sky line from dusk onwards, five nights a week, despite best intentions of University. P.Heath. Chair NNRA	Comments noted.	
6071	Support	Important structure	Support noted.	
3.11.5				
6626	Object	No mention is made here of the great roofline views of Riverside afforded from Elizabeth Way bridge. I believe these were even highlighted in the East Area Gate development document.	Where appropriate views of Elizabeth Way Bridge will be assessed as part of planning applications in that area.	

Danuagantations	Natura	Summary of Main Issue	Council's Assessment	Action
Representations	Nature	Summary of Main Issue	Councu's Assessment	Action
3.11.7				
6594 - English Heritage (East of England Region)	Support	Paragraph 3.11.7 makes reference to the recently completed Varcity Hotel on Thompson Lane and its impact on views of the city from Jesus Green. No value assessment of this impact is given. Does the City Council regard this as an acceptable addition to the Cambridge skyline, or indeed a positive addition? English Heritage regards it as wholly negative, and indeed it is a matter of regret that in spite of the requirements of Circular 01/01 we were not consulted on this application.	Comments noted. It is not the purpose of this guidance to attach value to existing buildings within Cambridge. This is a forward looking document and all applications will be judged on their merits and against Cambridge City Council Local Plan Policies, notably Policy 3/7 and 3/12.	
6719 - Park Street Residents' Association (PSRA)	Support	3.11.7 We SUPPORT the inclusion of the Varsity Hotel here as an example of a tall building that sits in marked contrast to the surrounding low level residential buildings.	Comments noted.	
6627	Support	In this point the unwelcome prominence of the Varsity Hotel at 7 storeys when compared to the low-lying residential areas surrounding it (that are substantially 3 or even 4 storey in the area) illustrates how negative the impact of a building even twice the height of its surroundings can be. This further emphasises that the proposed 4-storey 'cut-off' for new suburban buildings as not having to call themselves a 'tall' building is too high.	Comments noted.	
3.11.8				
6797 - Cambridge Past, Present & Future	Object	3.11.8 Area around Arbury/ Kings Hedges not fully analised as some larger buildings are present	Comments noted. The document is not intended to provide a detailed character assessment.	
3.11.9				
6798 - Cambridge Past, Present & Future	Object	3.11.9 Trees - need to relate species choice to commercial and residential floor heights - usually commercial buildings higher than 4 storeys and residential buildings higher than 5 storeys are well above tree line (i.e. mature forest-scale tree species such as ash, oak, beech). In relation to the edge of the Green Belt CambridgePPF generally considers 4 storeys and more as unacceptable edge to the rural/urban fringe edge/ Green Belt.	Comments noted. Section 3 is intended to provide a baseline character assessment of the city not provide guidance on future tree planting.	;

Representations	Nature	Summary of Main Issue	Council's Assessment	Action
6628	Object	Trees offsetting tall buildings - this is not the case for all Cambridge. Newmarket Road is a major entrance with few trees to offset the scale of new tall buildings. How many trees actually reach the height of a 'tall' building? Trees sufficient to offset the scale of a tall building would likely be so big that they could never be planted close enough to the building or road? Most would actually be smaller than the building, thereby actually emphasising how big the building was?	Comments noted. Context driven analysis will be used to assess the relative value of trees in townscape terms. Where trees are proposed as part of future development proposals, adequate space will be provided for these trees to grow. It is acknowledged that some parts of the city have considerably less trees than other parts. However the overall character of the city as a whole is one of a well-treed city.	
3.11.11				
6695	Object	The consultation continues (3.11.11) referencing Cambridge Leisure, rightly noting it as not particularly tall, but having a large mass. Sadly, that and the adjoining 'TravelLodge' which still manages to attract almost universally negative responses and derision are here to stay for the foreseeable duration in spite of running counter in almost every aspect to the guidance under discussion.	Comments noted. The development of a context based assessment criteria will help guard the future image of the city.	
		I therefore do not see the point of the consultation unless serious reference is made to its content, as the increasing amount of planning applications for tall (and inappropriate in mass) buildings are put forward to the planning department for consideration.		
		The consultation makes reference to Cambridge's unique and historic importance (along with its flat topography, making any unwelcome additions to the skyline particularly evident). At the current rate of development of tall buildings in Cambridge, future generations will look back at this decade in dismay as the opportunity lost to keep Cambridge respecting its architectural past in its topographical location, whilst maintaining a dynamism and relevance to the 21st-century.		
6799 - Cambridge Past, Present & Future	Object	3.11.11 Little Trees - is the highest point on the Magog Down (note not Gog Magog Downs); a good view is also from Wandlebury Country Park - from area close to Trevelyan Gate / bus stop	Comments noted.	

Representations	Nature	Summary of Main Issue	Council's Assessment	Action
6629	Support	I would also like to emphasise that there are several large recent developments on Riverside that are between 5 and 6 storeys in height.	Comments noted.	
6669 6720 - Park Street Residents' Association (PSRA)	Support	Support the need to consider mass of structure and continuity of roofscape in addition to height.	Comments noted.	
3.11.13				
6630	Object	Disagree that the East lack distinctive landmarks. Council's own Riverside Conservation Area Consultation document highlights several landmarks in the area, including the Leper Chapel, Barnwell Station buildings, Museum of Technology (including the very tall chimney) and Cellarer's Chequer building on Beche Road to name but a few. Also, though debatable as to whether this is a building or not, the new footbridge over the Cam on Riverside (in my opinion more visible than the Carter bridge outlined in the Guidance document) is a highly distinctive landmark as is the colourful swift tower opposite.	The text will be revised to include the chimney of the Technology Museum Landmarks. Whilst the buildings listed are distinctive, many are in well hidden positions. The text will be reworded to make greater reference to the suburbs east of the railway line rather than those areas associated with the River Corridor.	Amend text to include the Museum of Technology Chimney landmark. Amend text to make greater reference to the suburbs east of the railway line.
3.12 Landmark buildings				
6721 - Park Street Residents' Association (PSRA)	Object	3.12 Landmark buildings. OBJECT. The list includes a large number of 'landmark' buildings regardless of merit. The buildings listed are identified 'by merit of their visibility within the city.' We would prefer to see the wording amended to make it clear that they are in the list only because they are tall buildings and not because they are judged to have merit. For example, it might say ' by merit only of their visibility within the city.' Alternatively, it might be better to avoid use of the word 'merit' and say that the buildings in the list 'are identified because of their relative visibility within the city'.	Tall buildings are used in most cases as landmarks (or way-finding devices), so are in effect "landmarks" by virtue of their height. Also, the definition of "landmark" in the guidance does go beyond referring only to tall buildings (see section 3.12). Landmark buildings can, and should, include what some might consider poorly designed buildings. They are landmarks because they stand out first and foremost. The final version of the guidance will include graphics and illustrations showing which buildings perform a positive landmark.	Include graphic to illustrate how buildings can perform as a positive landmark
6800 - Cambridge Past, Present & Future	Object	3.12 List all building heights in metres above ground level; Postwar - add the Møller Centre (Churchill College)	Comments noted. Agree to include heights in metres. The Urban Design Team will use the Cambridge Building Heights Model to establish landmark building heights as close as practical to the actual height above finished grade.	Include heights of landmark buildings in metres, based on the Cambridge Building Heights model.

Representations	Nature	Summary of Main Issue	Council's Assessment	Action
3.12.1				
6752 - Beacon Planning Ltd	Object	3.12.1the list of 'landmark buildings' for some reason seems to be divided by age, when this has nothing to do with its definition as a landmark. The Railway Station is a 'landmark building' but is not included in the list. Some of the descriptions seem a bit bizarre eg 'Fitzwilliam Museum (not overtly prominent at a larger scale)' is particular puzzling. It is either a landmark building or it isn't.	Comments noted. It is acknowledged in the text of the guidance (section 3.12) that a landmark building does not need to be tall. However, it is generally the case that the list of landmark buildings given in Section 3.12 of the report refers to buildings which are landmarks by virtue of their height. The text will be amended to make this more explicit.	Amend text within 3.11.1 to read "The Oxford English dictionary defines a landmark as "an object or distance, feature of a landscape or town that is easily seen and recognised from a distance, especially one that enables someone to establish their location e.g. the spire was once a landmark for ships sailing up the river". The Dictionary of Urbanism (Cowan, 2005) defines a landmark as "a conspicuous building or structure; one that stands out from the background buildings; a point of reference in the urban scene." Interestingly, Kevin Lynch notes in his important work 'The Image of the City' that a landmark need not be tall. For example the 'grasshopper clock' of Corpus Christi College is a landmark. However for the purposes of this guidance, the principal landmark buildings on the City skyline (listed in Appendix with heights) are identified by merit of their relative visibility within the City which is generally defined by relatively increased height. Almost all of the landmark buildings built prior to the 20th Century lack useable floor area at high level but instead aim to enhance the skyline of the city through height."
6670	Object	The use of the word merit in the identification of landmarks seems very slippery. It should read NOT by merit but by relative visibility.	Comments noted. Tall buildings are used in most cases as landmarks (or way-finding devices), so are in effect "landmarks" by virtue of their height. Also, the definition of "landmark" in the guidance does go beyond referring only to tall buildings (see section 3.12).	Include graphic to illustrate how buildings can perform as a positive landmark
			Landmark buildings can, and should, include what some might consider poorly designed buildings. They are landmarks because they stand out first and foremost. The final version of the guidance will include graphics and illustrations showing which buildings perform a positive landmark.	

Representations	Nature	Summary of Main Issue	Council's Assessment	Action
6350	Object	3.12.1 Details about heights in metres should be provided for all of the buildings listed.	Comments noted. Agree to include heights in metres. The Urban Design Team will use the Cambridge Building Heights Model to establish landmark building heights as close as practical to the actual height above finished grade. The guidance will note the lack of useable space in many historic tall buildings e.g. church spires.	Include heights of landmark buildings in metres, based on the Cambridge Building Heights model. Guidance to note the lack of useable space in many of the historic tall buildings, e.g church spires.
6595 - English Heritage (East of England Region)	Support	Paragraph 3.12.1 includes a schedule of landmark buildings in Cambridge. Regrettably there is no qualitative assessment as to which are good buildings that make a positive contribution to the character and appearance of the city, and which are harmful. Being prominently visible may make a building a landmark, but it does not necessarily make it a good landmark. Furthermore it would be helpful to note that almost all the pre-20th century landmark structures do not provide useable floor area at high level, rather their upper sections are concerned with providing enhancement to the city. This is in marked contrast the more recent landmark structures, where the emphasis is almost always on providing additional useable floor area. We would also question the description of Foster's Mill as a ten-storey structure. In fact it has 5 floors plus a full attic floor, with a raised central tower that originally contained the water tank needed for fire suppression.	Tall buildings are used in most cases as landmarks (or way-finding devices), so are in effect "landmarks" by virtue of their height. Also, the definition of "landmark" in the guidance does go beyond referring only to tall buildings (see section 3.12). Landmark buildings can, and should, include what some might consider poorly designed buildings. They are landmarks because they stand out first and foremost. The final version of the guidance will include graphics and illustrations showing which buildings perform a positive landmark.	Include graphic to illustrate how buildings can perform as a positive landmark
(iv) Post War 6568	Object	The Belvedere well illustrated a point about built form and density. Many built form studies have shown that a given density on comprehensive schemes that the same density can be achieved by an low rise as by separate high rise blocks. The small number of apartments in the upper tower could have been accommodated within the modified remainder of the scheme with little increase in volume.	Comments noted.	

Representations	Nature	Summary of Main Issue	Council's Assessment	Action
6660	Object	Several of these buildings have sympathetic settings, or require height for their purpose e.g. Addenbrooke's Hospital chimney, however 9+ storeys is FAR too high for the extreme flatness of Cambridge and the negative visual impact not only to the skyline, but being able to see buildings of great height/or blue neon lights from such a large area of Cambridge. The setting of modern buildings, type of materials needs to be rigorously considered. E.g. the first things first time visitors by train see of Cambridge are the height of these tall buildings which are not indicative of Cambridge.	Comments noted.	
6585 - Brunswick & North Kite Residents Association (BruNK)	Support	we were astonished that planning permission was granted for the 6 storey Varsity Hotel overlooking Jesus Green, which sits among mostly two and three storey residential dwellings and is very visible from Jesus Green. We hope that this new Skyline Guidance will prevent any such developments being approved for anywhere near Midsummer Common or any of the other green spaces that contribute so much to the unique character of the City.	Comments noted.	

Representations	Nature	Summary of Main Issue	Council's Assessment	Action
3.13 Viewpoint analysis				
6779 - Cambridge Past, Present & Future	Object	Iconic Views: The guidance should seek to identify the most important views within the city that are a fundamental part of its heritage - for example, the College Backs, the view up Kings Parade, the view along the River Corridor etc. A short discrete list of such views should be drawn up with the stipulation that no new building will be approved that interrupts or degrades these views. This is more than just identifying view cones and vistas - these should be much more protected views. Other cities, including London, has protected views so why not Cambridge? Although in London a lot of formal view are protected - Cambridge's informal ones are equally worthy of preserving and enhancing.	Disagree. A context driven assessment set out under criteria 1 is appropriate. The Cambridge Local Plan review is the opportunity to review the Policy in relation to protected views. It would not be effective use of officer time and resources to produce an SPD at this stage and then have its status potentially reduced following the Local Plan review.	
		Given the importance of managing the development of tall buildings in a city like Cambridge that has a great deal of heritage assets and that so much of the local economy is driven by these, could the guidance be adopted and given greater statutory weight? If not, why not? Or will guidance work in the interim and how with the Local Plan Review? CambridgePPF considers it as essential that a strong adopted guidance is being prepared at an early stage to ensure quality development of Cambridge.		
6753 - Beacon Planning Ltd	Object	3.13 seems to seek to re-introduce the concept of 'view cones' from the 1996 Local Plan. The distance between most of the viewpoints and a development site is sufficiently far as to make any meaningful analysis of the impact of development almost impossible without binoculars. Unless a proposed building (s) is of a significant mass, or very substantially increased height then any photography and subsequent illustrations of a potential impact will not be particularly helpful. Far better would be to agree viewpoints relevant to a particular application.	Disagree. The Council are not attempting to reintroduce the view cones. The list provides views, which should be considered by the developer. All views will be agreed on a case by case basis to avoid unnecessary assessment work.	

Representations	Nature	Summary of Main Issue	Council's Assessment	Action
3.13.4				
6801 - Cambridge Past, Present & Future 6850 - South Cambridgeshire District Council	Object	Suggestion of additional viewpoints to be included within the guidance.	Comments noted. It is not considered necessary or appropriate to list all of these view points within the document; there are simply too many to be of use, and furthermore it should be to the proponent of a tall building to agree with the Council a list of views to be provided for assessment on a case by case basis. It is worth noting that relative distance of each view is taken from the city's historic core. This will be made explicit in the text. It is stated in section 3.13.5 that local views must be considered on a case by case basis as part of the pre-application process and a list of important local views from key open spaces is given. Figure 3.6 shows a number of strategic views which, with the exception of Castle Hill, are taken from the outer edge of the city. Additional strategic views from the M11 and A14 (potentially junction of A14/A10) and a view from the River Cam looking south between the A14 and Baits Bite Lock should be included. Other long distance views from outside the city will be considered on a case by case basis. Views from private buildings including multi-storey car parks, though interesting, are not considered appropriate to include in the guidance, though such views could be provided by developers where proposals are in close proximity to such car parks.	Additional strategic views from the M11 and A14 (potentially junction of A14/ A10) and a view from the River Cam looking south between the A14 and Baits Bite Lock should be included.

Representations	Nature	Summary of Main Issue	Council's Assessment	Action
(iii) Views from the northea	st and noi	rth		
6072	Object	Green belt area ay Ditton Meadoes	Comments noted. It is not considered necessary or appropriate to list all of these view points within the document; there are simply too many to be of use, and furthermore it should be to the proponent of a tall building to agree with the Council a list of views to be provided for assessment on a case by case basis. It is worth noting that relative distance of each view is taken from the city's historic core. This will be made explicit in the text. It is stated in section 3.13.5 that local views must be considered on a case by case basis as part of the pre-application process and a list of important local views from key open spaces is given. Figure 3.6 shows a number of strategic views which, with the exception of Castle Hill, are taken from the outer edge of the city. Additional strategic views from the M11 and A14 (potentially junction of A14/A10) and a view from the River Cam looking south between the A14 and Baits Bite Lock should be included. Other long distance views from outside the city will be considered on a case by case basis. Views from private buildings including multi-storey car parks, though interesting, are not considered appropriate to include in the guidance, though such views could be provided by developers where proposals are in close proximity to such car parks.	Additional strategic views from the M11 and A14 (potentially junction of A14/ A10) and a view from the River Cam looking south between the A14 and Baits Bite Lock should be included.
3.13.5				
6661	Object	If there is a cluster of tall buildings proposed in an area of the city, and if they are all considered on a case-by-case basis then the true impact of all of these applications on the traffic, view, skyline, local people, etc will not be correct. For example, the traffic data will be outdated, and the impacts of individual buildings far smaller than the combined effect of many new buildings. Additionally the construction phase (and with it the associated traffic and noise, dust and light pollution) can be extremely frustrating and problematic.	Comments noted. The guidance does not propose the clustering of tall buildings. Any traffic modelling will have to take account of the uplift of floor space. A section will be added to ensure that developers take account of other tall buildings which have approval within their applications.	Include text requiring developers to take account of other tall buildings with have been given approval surrounding the application site.

Representations	Nature	Summary of Main Issue	Council's Assessment	Action
6631	Object	Many attractive views are available down Riverside - not acknowledged here but acknowledged in Riverside Area Conservation Consultation	Comments noted. It is not considered necessary or appropriate to list all of these view points within the document; there are simply too many to be of use, and furthermore it should be to the proponent of a tall building to agree with the Council a list of views to be provided for assessment on a case by case basis. It is worth noting that relative distance of each view is taken from the city's historic core. This will be made explicit in the text. It is stated in section 3.13.5 that local views must be considered on a case by case basis as part of the pre-application process and a list of important local views from key open spaces is given. Figure 3.6 shows a number of strategic views which, with the exception of Castle Hill, are taken from the outer edge of the city. Additional strategic views from the M11 and A14 (potentially junction of A14/A10) and a view from the River Cam looking south between the A14 and Baits Bite Lock should be included. Other long distance views from outside the city will be considered on a case by case basis. Views from private buildings including multi-storey car parks, though interesting, are not considered appropriate to include in the guidance, though such views could be provided by developers where proposals are in close proximity to such car parks.	Additional strategic views from the M11 and A14 (potentially junction of A14/ A10) and a view from the River Cam looking south between the A14 and Baits Bite Lock should be included.
6802 - Cambridge Past, Present & Future	Object	3.13.5 * Should read Stourbridge Common & Fen Ditton Meadows, Add River Cam Corridor	Comments noted. Bullet point 8 within paragraph 3.13.5 will be amended to read 'Stourbridge Common & Fen Ditton Meadows'. An additional bullet for the 'River Cam corridor' will be added.	Amend bullet point 8 within paragraph 3.13.5 to read 'Stourbridge Common & Fen Ditton Meadows' add the 'River Cam corridor' as an additional bullet point.
6722 - Park Street Residents' Association (PSRA)	Object	3.13.5 and 3.13.6 OBJECT. For the avoidance of doubt the guidance needs to state that it is views FROM and/or ACROSS the places listed that are important.	Comments noted. The text will be changed to state views are across and from the relevant open spaces.	Amend text to state views are across and from the relevant open spaces.
6851 - South Cambridgeshire District Council	Support	Paragraph 3.13.5 mentions 'Local short distant views' but does not provide an example. Some views of the Cambridge city skyline from within South Cambridgeshire are short distance views. Care should be taken in drafting the final document not to categorise all the views from South Cambridgeshire as long distance views.	Comments noted.	

Representations	Nature	Summary of Main Issue	Council's Assessment	Action
3.13.6				
6632	Object	I believe that the cycle bridges on Riverside and Cutter Ferry should be included in this list	The Millennium Bridge could qualify as landmarks by virtue of its interesting design . However the list is intended to focus on buildings which are landmarks predominantly by virtue of their height and scale.	
6754 - Beacon Planning Ltd	Object	3.13.6 how are the Backs considered to be 'an elevated view'?	comments noted, this will be revised	Revise paragraph 3.13.6 - the Backs are not considered an elevated view.
6687 - unex holdings limited	Object	The additional list of "elevated city views" is an inappropriate method of assessment because it does not appear to be based on key boew corridors torwards important/historic buildings and spaces. It appears to be simply a list of places where its is possible to get a local or short distance view. Adopting such an approach would be far too restrictive. It is wrong to base a guidance document of arbitrary viewpoints. The view corridors should only exist in they have a specific purpose in protecting a truly important view.	The list of local views take into account local views which are still of importance to the local area, regardless of their relationship to the historic core. Specific viewpoints shall be agreed as part of the preapplication process.	
3.13.7				
6803 - Cambridge Past, Present & Future	Object	3.13.7 Green Infrastructural links should be added as important and in relation to sites/ approach routes identified by the Cambridgeshire Green Infrastructure Strategy 2011 and Cambridge City Council's Nature Conservation Strategy. This must include also non-vehicular routes which favour sustainable modes of transport such as walking, cycling and horse riding * Local routes such as The Tins (Cherry Hinton/ Church End to City) * Harcomlow Way/ Wimpole Way (Coton/ Coton Countryside Reserve to City) * Mere Way * Other current and new recreational links between the countryside and City	key long distance footpaths have been added to the figures and referred to within the movement and approaches section. As part of the pre-application process, views form local footpaths will be identified where appropriate.	

Representations	Nature	Summary of Main Issue	Council's Assessment	Action
6688 - unex holdings limited	Object	It is wrong to elevate in importance "local views from key approach roads". View corridors should only exist if they protect truly important views. The approach into the city from the south along Hills Road (in the triangle formed by the Railway Station, The Station Road/Hills Road junction and the Hills Road/Cherry Hinton Road junction) should be positively promoted for development given its sustainable transport links. Similarly the approach towards the Elizabeth Way roundabout/East Road/Grafton Centre should be promoted given its sustainable location.	Comments noted. The assessment of view corridors into the city is important. This statement does not preclude tall buildings it merely states that applicants need to carefully consider them and ensure that the design of the buildings is appropriate. Hills Road is a key gateway to the city and needs to be assessed.	
6517	Support	(Submitted on behalf of the Nineteen Acre Field RA) NAFRA agrees strongly with this.	support noted.	
6073	Support	Important to ensure careful consideration before any development	support noted.	
3.13.8				
6633	Support	I would like to emphasise the importance of Riverside and Stourbridge Common in the view from footpaths along the river corridor - as outlined in the Riverside Conservation Area document	Comments noted.	
3.14.2				
6362 6723 - Park Street Residents' Association (PSRA)	Object	Responses suggested the guidance should reintroduce the 'cones of view' from the 1996 Local Plan.	Comments noted. The cones of view shown in the 1996 Cambridge Local Plan were omitted in the 2006 Local Plan following a review by the government Inspector examining the Plan at the time. The view cones were not considered sufficiently robust or defensible, and so were dropped in the 2006 Local Plan. The London View Management Framework SPG 2010 establishes protected views, however this is a very substantial document which has required a highly technical appraisal process the expertise of external consultants. Such a framework is not considered necessary, or beneficial, in the case of Cambridge given its much smaller scale and generally low height in comparison to London.	

	• • • • • • • • • • • • • • • • • • • •	a		
Representations	Nature	Summary of Main Issue	Council's Assessment	Action
3.14.3				
6634	Object	I would argue that when viewed from distant elevated sites such as the Gog hills that the skyline of all of Cambridge is important (not just West Cambridge and the Historic Core) as most of the Cambridge skyline is visible from this point. I am concerned that point 3.14.3 again exemplifies that the focus in this document is too much on the historic core or 'gown' to the detriment of the 'town'. This will increase the pressure on those areas of the town not highlighted in this point.	Section 3.14.3 interprets what can already be found in Policy 3/13 which emphasises the protection of the historic features of the City. These features are predominantly found within the historic core however the guidance has been prepared to ensure all parts of the city are not adversely impacted by future tall buildings. Any tall buildings beyond the historic core will be assessed using the same criteria as for the historic core.	
6724 - Park Street Residents' Association (PSRA)	Support	3.14.3. We SUPPORT reiteration that ' views from open spaces within the city to the historic core are very important and are arguably the most important views '.	Comments noted.	
6391 - CPRE	Support	Strongly support. Cities like Cambridge have a clear choice: behave like Paris (keep a low and relatively uniform roofline, with tall buildings at a very great distance from the historic city) or behave like Shanghai (anything permitted). There is no middle ground which preserves aesthetics and will attract international tourism.	Support noted.	
3.15.1				
6678	Object	The skyline is very much also composed of trees as you have noted elsewhere but it should also be here.	The conclusion clearly makes reference to trees in relation to the skyline.	
6725 - Park Street Residents' Association (PSRA)	Object	3.15.1 OBJECT. No reference to trees - a serious omission. We suggest the inclusion of the word 'tree' here to read: 'The City skyline comprises a mix of trees, spires, towers and chimneys.'	The conclusion states "The City skyline comprises a mix of spires, towers and chimneys which emerge as a series of incidents above a background of lower buildings and trees"	

Representations	Nature	Summary of Main Issue	Council's Assessment	Action
3.15.2				
6672	Object	Support especially the word "modest" as an accurate, human-friendly description of the characteristic we wish to see preserved. Would prefer "taller" instead of "tall" particularly here to avoid height and mass creep. Delete the word "significantly" to avoid ugliness creep. Why should we want to encourage any amount of detraction?. Given the commercial pressures in every period the result of repeated detraction becomes inevitably ugliness creep.	Comments noted. The term significant must be considered on a case by case basis. As examples, a four-storey building next to a two-storey building could be considered significant (though something like the roof form, whether flat, pitched or otherwise could impact such a finding). However, a 10-storey building next to an eight-storey building may not be considered significant. Thus the conclusion of what is considered "significant" is entirely dependent on what and where it is proposed. Therefore, to enable appropriate flexibility of the guidance and to allow for proper interpretation of each case, a specific definition of "significant" is not proposed.	
6689 - unex holdings limited	Support	In this section the Council recognises that there are key views within the City and from the Backs, which are world-renowned. The Council also recognises that local views within and across the historic core will continue to be of the greatest importance. The Council should continue to protect these views by having restrictive assessment guidance in relation to development, which affects these key defined views. To balance this, however, the council needs to promote tall buildings and development in sustainable areas at the perfection of the city adjacent to transportation interchanges.	Comments noted.	
6726 - Park Street Residents' Association (PSRA)	Support	3.15.2 We SUPPORT the emphasis on the modest scale of the city and low lying topography and that this means that the skyline (however defined) is highly sensitive to change with few opportunities to mitigate the effects of tall buildings.	Comments noted.	
6077	Support	Cambridge really does not need tall buildings and the city should try and rid itself of its peculiar obsession with 'signature' projects which tend to be tall. Its topography is unsuited to them, and two recent examples of such buildings in the city show all too well how much damage they can do to the visual environment.	Comments noted.	

Representations	Nature	Summary of Main Issue	Council's Assessment	Action
3.15.3 6727 - Park Street Residents' Association (PSRA)	Object	3.15.3 OBJECT. We repeat concerns expressed in 1.5.3. We are very concerned that the guidance should enable the council to resist "height creep" in the background built form and its effect on the skyline.	Comments noted. As part of criteria 1, the text will state applicants should take into account the impact of any recently approved tall building applications with a view to assessing the scheme's cumulative impact.	Amend text to state applicants should take into account the impact of any recently approved tall building applications with a view to assessing the scheme's cumulative impact.
6074 6673	Object		Comments noted.	
6392 - CPRE	Support	The design of any new tall building or structure should be of the highest design quality.	Comments noted.	

Representations	Nature	Summary of Main Issue	Council's Assessment	Action
4.0 Assessment Crite	rion			
4.0 Assessment Criterion				
6761 - Beacon Planning Ltd	Object	Finally, we would like to draw attention to the costs associated with providing the amount of information that may be required to meet the assessment criteria in the draft guidance. In the current economic climate the imposition of additional financial burdens (which can easily run into many tens of thousands of pounds to commission the raft of studies referred to) will act as a deterrent to development. The guidance should only seek information that is directly and proportionately relevant to the application being made.	Comments noted. Policies within the Local Plan (Policy 3/4) and schemes for tall buildings that have the potential to impact the skyline should be appropriately assessed. This approach has been undertaken for other scheme across the city in terms of assessing key views. The exact assessment process required will vary according to the scale and location of the development. This is acknowledged in the text.	
6728 - Park Street Residents' Association (PSRA)	Object	OBJECT Much is made in various parts of the document of the fact that it will provide 'a robust set of criteria' to assess planning applications with a view to preserving the special character of Cambridge (e.g. 2.3.2). It follows from this that the criteria must be clear and unambiguous so that everyone (the public, planners, developers and especially members of the planning committee) understand what will or will not be acceptable. Developers with their access to expensive lawyers are especially adept at 'interpreting' guidance of this sort to match their plans. There is inconsistent use throughout the whole of section 4 of the use of the words 'should', 'need(s) to' and 'must'.	Comments noted. Where appropriate the use of 'should' will be replaced by 'needs to'.	Replace 'should' with 'needs to'
6783 - Cambridge Past, Present & Future	Object	General other Materials - Does the document currently sufficiently considers roofing materials (tiles, slate, grass/ green roof solution etc)? West Cambridge's pale blue/ grey/ white cladding not necessarily positively contribute to the setting of the edge of the city - particularly during the autumn/winter/early spring season. What happens with tall building not in use (Norwich has such problem)? - How can one achieve any of such becoming a blight on the townscape if economic climate/ ownership are not conducive?	Agree. Guidance on materials will be added to criteria 3.	Include guidance on materials within Criteria 3.

Representations	Nature	Summary of Main Issue	Council's Assessment	Action
6564	Object	The many consideration and assessment criteria in section 4 only apply to buildings that are 'significantly taller' than its surroundings. Without a definition of 'significant' without this it is difficult to see how the guidance note can be applied.	Comments noted. The term significant must be considered on a case by case basis. As examples, a four-storey building next to a two-storey building could be considered significant (though something like the roof form, whether flat, pitched or otherwise could impact such a finding). However, a 10-storey building next to an eight-storey building may not be considered significant. Thus the conclusion of what is considered "significant" is entirely dependent on what and where it is proposed. Therefore, to enable appropriate flexibility of the guidance and to allow for proper interpretation of each case, a specific definition of "significant" is not proposed.	
6852 - South Cambridgeshire District Council	Object	The Assessment Criteria in paragraph 4 does not advise consultation with 'South Cambridgeshire District Council' in relation to any proposed variation to the Cambridge city skyline visible from the South Cambridgeshire parishes. South Cambridgeshire District Council would welcome the opportunity to assist Cambridge City Council in the assessment and consideration of mitigation, of any impacts of potential development on the city skyline and therefore the city's location within a wider rural setting.	Comments noted. Where appropriate South Cambridgeshire District Council will be consulted by Cambridge DC in relation to visual impact. The Council wish to continue the close working relationship between the two authorities. However The Council do not believe the onus should be on the developer to consult South Cambridgeshire DC at the pre-application stage.	
4.1 Explanation of assessm	ient criteri	a		
6484 - Cambridge City Council Design and Conservation Panel	Object	A practical tool. Creating photomontages by superimposing current schemes on images would be particularly useful to those developers bringing forward smaller proposals.	Comments noted.	
4.3 Relevant policy and gu	idance			
6576 - Cambridgeshire County Council	Support	The County Council has adopted The Location and Design of Waste Management Facilities as a Supplementary Planning Document (2011). This will assist in securing high quality design and operation of waste management facilities, and it would be appropriate and helpful if this Guide is included in the list of relevant policies and guidance (Section 4.3) in the Skyline Guidance document.	Agree, 'The Location and Design of Waste Management Facilities SPD' will be included in the list of relevant policy in paragraph 4.3.1.	Include 'The Location and Design of Waste Management Facilities SPD' Cambridgeshire County Council (2011) in the list of relevant policy and guidance within paragraph 4.3.1.

Representations	Nature	Summary of Main Issue	Council's Assessment	Action
6596 - English Heritage (East of England Region)	Support	Section 4.3 lists out relevant policies and guidance. We note that the English Heritage guidance on 'Seeing the History in the View' is included, but we would strongly recommend that our recently published guidance on 'The Setting of Heritage Assets' (October 2011) is also included.	Agree. The English Heritage document 'The Setting of Heritage Assets' (October 2011) will be included in the list of relevant policy and guidance within paragraph 4.3.1	Include 'The Setting of Heritage Assets' (October 2011) in the list of relevant policy and guidance within paragraph 4.3.1.
4.3.1				
6635	Object	Should not the Eastern Gate Visioning Document be included in this list?	Agree. 'The Eastern Gate Development Framework SPD (October 2011)' will be included in the list of relevant policy and guidance within paragraph 4.3.1	Include 'The Eastern Gate Development Framework SPD (October 2011)' in the list of relevant policy and guidance within paragraph 4.3.1.
6755 - Beacon Planning Ltd	Object	4.3.1 the list of documents is not necessary nor is the list of policies.	Disagree, applications will need to be aware and make reference to other policy, guidance and documentation. The relevant policy and guidance will to changed to form an appendix.	Place the policy and guidance documents in paragraph 4.3.1 in an appendix.
4.4 The assessment criteria				
6636	Object	I can't see that congestion or impact on local infrastructure or amenities etc has been considered in these criteria, is this considered elsewhere? These are critical factors to the assessment of new tall building proposals.	Comments noted. The impact of the scheme on traffic and local infrastructures is outside of the scope of this document, traffic impact is assessed through a traffic impact assessment (TA) which is submitted as part of a planning application with Cambridgeshire County Council. The scheme's impact on local infrastructure will be assessed as part of the normal planning process.	
6729 - Park Street Residents' Association (PSRA)	Support	We SUPPORT places where the word 'must' is used as in 4.4.4, 4.4.5, 4.4.10 and 4.4.18.	Support noted.	

Representations	Nature	Summary of Main Issue	Council's Assessment	Action
Criteria 1: Location, setting	g and cont	ext		
6363	Object	This criteria is too vague. It would allow further tall buildings to block the views of the city centre from viewpoints outside the city. There should be an absolute ban on buildings that obstruct the view by stating a list of viewpoints and the skyline of currently visible buildings from that viewpoint that must remain visible in a 10 degree cone around the target building. For example, from Red Meadow Hill no application should obstruct the views of any of the landmark buildings listed in 3.12 above currently visible.	The criteria, as currently drafted, would enable detailed consideration of the impact of existing views of other landmark buildings; this is a fundamental reason why the criteria-based approach is being progressed by the Council. Applying blanket values or figures for cones of view is not considered appropriate for application across all parts of the city or in all cases.	
6487 - Cambridge City Council Design and Conservation Panel	Object	South Cambridgeshire. As many strategic views are from South Cambridge, guidance on tall buildings in Cambridge should ideally explicitly address South Cambridgeshire District Council's contribution to the protection and enhancement of the City's skyline.	Comments noted.	
4.4.1				
6804 - Cambridge Past, Present & Future	Object	4.4.1 Other criteria should be considered: Space between buildings and their quality (from streets, green spaces and squares) - how will the micro-climate be affected at ground-level (particularly if several large or tall buildings)? Criteria must be set in relation to overshadowing and wind-tunnel effects (see also later para 4.4.20)	Comments noted. Microclimate is discussed in Criteria 4.	
6637	Object	Can these criteria be circumvented by designing lower buildings that cover a greater area e.g. 4-storey over a wider area so that this guidance does not have to be considered?	Comments noted. This guidance is not the only design guidance available. There are design policies within the Local Plan that applicants will need to satisfy. In some instance Policy 3/13 may not apply others in the Local Plan.	
6674	Support	Support particularly the the emphasis on the requirement for a positive contribution.	Support noted.	

Representations	Nature	Summary of Main Issue	Council's Assessment	Action
4.4.3				
6805 - Cambridge Past, Present & Future	Object	4.4.3 Should also cover situation where a new tall building is proposed to an existing single or cluster buildings - a clause to that effect must be added.	Reference to cumulative impacts will be added.	Criteria 4 will be amended to read 'Applicants for larger proposals will need to take account of the potential cumulative impact of other approved ta building applications within close proximity to the development sites'.
6756 - Beacon Planning Ltd	Object	4.4.3 other methodologies are applicable, for example the Design Manual For Roads And Bridges.	Comments noted. The Design manual for roads and bridges will be added.	Include the 'Design manual for roads and bridge within the list of guidance in paragraph 4.4.3
6518	Support	(Submitted on behalf of the Nineteen Acre Field RA) Scale and massing are also clearly important factors, but too often they apply in buildings to which this policy may not generally apply (cf the impact of Cambridge Leisure in photograph 1).	Support noted.	
4.4.4				
6519	Support	(Submitted on behalf of the Nineteen Acre Field RA) We trust that submission in digital form is a requirement these days.	Comments noted.	
4.4.5				
6555	Object	Vistas and view corridors should not be restricted to ground level. The view from adjoining residential properties at second or third floor level needs to be considered. The criteria also need to allow for night illumination, and "glass-box" office buildings should not be permitted if internal lighting at night is inadequately screened.	Comments noted. It is not reasonable or practical to expect applicants to assess views from upper floor windows of private properties as a matter of course. It may be appropriate for applicants to include predicted views from adjacent buildings, using 3D computer modelling in particularly contentious schemes. This would need to be assessed on a case by case basis.	
			Depending on the scale and location of the proposals, night time assessments of the proposals may be required. This will be assessed on a case by case basis.	
6806 - Cambridge Past, Present & Future	Object	4.4.5 Illustrate examples covering vistas, panoramas, view corridors	Agree, images, photographs, illustration and graphics will be included to enable the reader to better interpret the text.	Include images, photographs, illustration and graphics covering Vistas, Panoramas and view corridors to be included in paragraph 4.4.5.

Representations	Nature	Summary of Main Issue	Council's Assessment	Action
4.4.6				
6364	Object	This is insufficient protection. There should be an absolute prohibition on blocking the views in the already defined list of viewpoints and landmark buildings in section 3 above.	The criteria, as currently drafted, would enable detailed consideration of the impact of existing views of other landmark buildings; this is a fundamental reason why the criteria-based approach is being progressed by the Council. Applying blanket values or figures for cones of view is not considered appropriate for application across all parts of the city or in all cases.	
4.4.7				
6638	Support	And also obscure light as well as provide a sense of enclosure.	Comments noted. The loss of light is addressed within criteria 4.	
4.4.8				
6639	Object	I would be interested in understanding, in the views of residents and visitors, to know exactly how many of Cambridge's current tall buildings built during the 20th or 21st century actually "make a positive contribution to the City" as stated in this point.	Comments noted.	
6597 - English Heritage (East of England Region)	Support	We do not see the relevance of paragraph 4.4.8. A well designed building that sits within the adjacent skyline can also assist in way-finding; the recently installed timepiece on the corner of Bene't Street and King's Parade has quickly become a well-known landmark, but makes no impact on the city's skyline. We would also suggest that paragraph 4.4.9 is reworded as a simple caution along the lines of; given the general low-lying topography of the city, taller buildings on higher ground will have a greater impact, and will therefore be subject to close scrutiny.	Comments noted. Whilst a landmark building does not necessary mean tall, there is a well established that a taller building can provide interest, variety and enhance the legibility of a place.	

Representations	Nature	Summary of Main Issue	Council's Assessment	Action
4.4.9				
6580 - Brunswick & North Kite Residents Association (BruNK)	Support	We agree with this but must point out that the new housing currently being built on the raised land overlooking Midsummer Common on the former Cambridge Regional College site will be 7 storeys high! If this guidance had been followed, permission for buildings of this height would surely not have been given.	Comments noted.	
Summary - Criteria 1				
6365	Object	This criteria is not specific enough. There should be a ban on buildings that further block the views of landmark buildings from the viewpoints using the lists in Section 3 above.	This would entail the reinstatement of protected viewcones and change in policy. The guidance can not change policy.	
4.4.10				
6556	Object	Vistas and view corridors should not be restricted to ground level. The view from adjoining residential properties at second or third floor level needs to be considered. The criteria also need to allow for night illumination, and "glass-box" office buildings should not be permitted if internal lighting at night is inadequately screened.	Comments noted.	
4.4.11				
6757 - Beacon Planning Ltd	Object	4.4.11 presumably any application that has an impact upon a heritage assess should be accompanied by a 'Heritage Statement' as per PPS5.	Comments noted. Text to be added to paragraph 4.4.11 to read 'Any application that has an impact upon a heritage asset should be accompanied by a heritage statement or include appropriate references within the Design and Access Statement'.	Amend text in paragraph 4.4.11 to read 'Any application that has an impact upon a heritage asset should be accompanied by a heritage statement or include appropriate references within the Design and Access Statement'.

Representations	Nature	Summary of Main Issue	Council's Assessment	Action
6730 - Park Street Residents' Association (PSRA)	Object	We OBJECT to many of the places where the words 'should' or 'needs to' appear because these appear to offer ambiguity as in 4.4.11 which states 'Applicants should make reference to the 'Historic Core Appraisal' undertaken by the Council and the various Conservation Area Appraisals undertaken across the city.' We would prefer to see the word 'must' in place of 'should' here. For example,	Comments noted. Where appropriate the use of 'should' will be replaced by 'needs to'.	Replace 'should' with 'needs to' in 4.4.11
6581 - Brunswick & North Kite Residents Association (BruNK)	Support	We note the weight given to the Historic Core Appraisal but are dismayed to see that streets in our area including Maids Causeway, Newmarket Road, Fair Street, Willow Walk and New Square - which have over 60 Listed Buildings and are part of the Kite Conservation Area, are not mentioned in this document. We also note that several residents associations were consulted during the appraisal, but BruNK was not among them. We believe this is a serious oversight.	Comments noted. These streets, whilst not lying within the area defined by the historic core, still lie within central conservation area and within a highly sensitive area, which is still afforded a high level of protection within the Local Plan.	
4.4.12				
6520	Object	(Submitted on behalf of the Nineteen Acre Field RA) We do not feel a case has been made for 7 storeys as the trigger (as we have also noted in our response to 1.5.6).	Comments noted. The text in paragraph 1.5.6 and 4.4.12 will be amended to state six storeys and above for the historic core and four storeys and above for the suburbs will be used for the triggers for assessment.	Amend paragraph 1.5.6 and paragraph 4.4.12 will be amended to state six storeys and above for the historic core and four storeys and above for the suburbs will be used for the triggers for assessment
6598 - English Heritage (East of England Region)	Support	As mentioned in reference to paragraph 1.5.6 above, we recommend removing the reference to seven stories and replacing it with a trigger of 20 metres.	Comments noted. Suggestion welcome, however the suggested height triggers are more specific, and so appropriate, to the Cambridge condition. Disagree with omitting the reference to floors as number of floors does act as a good benchmark to most people.	
6640	Support	It is indeed unlikely that tall buildings within the historic core will be approved and this is the area of most dense and tallest buildings, as noted in this document. By virtue of this, it means that most tall buildings will be built outside of the Core area, in an environment where by this documents own admission, the building heights are overall significantly lower. Therefore most tall buildings will be out of context with their surroundings to a greater extent.	Comments noted.	

Representations	Nature	Summary of Main Issue	Council's Assessment	Action
4.4.13				
6807 - Cambridge Past, Present & Future	Object	4.4.13 Add "Registered Historic Park and Gardens"; ref Listed Building use capitals as per other designations.	Agree, 'Registered Historic Park and Gardens' will be included in the list of heritage assets in paragraph 4.4.13.	Include 'Registered Historic Park and Gardens' in paragraph 4.4.13.
6731 - Park Street Residents' Association (PSRA)	Object	4.4.13 OBJECT. It states 'all building proposals which have the potential to impact on heritage assets will need to demonstrate and quantify the impact'. It would be much better to say 'must' instead of 'need to'.	Disagree. 'Needs to' is sufficient within a guidance document.	
6758 - Beacon Planning Ltd	Object	4.4.13 Registered Parks and Gardens should be added to the list of heritage assets and all undesignated heritage assets should also be included, not just BLIs.	Agree, 'Registered Historic Park and Gardens' and 'all undesignated heritage assets will be included in the list of heritage assets. Undesignated heritage assets will be verified through a context appraisal of the application site at pre-application stage by the developer and local authority, and will be identified within a Design and Access Statement.	Include 'Registered Historic Park and Gardens' and 'all undesignated heritage assets'.
Criteria 3: Scale, massing	and archit	ectural quality		
6443	Object	I'm only objecting to this because it seems a little weak in view of the impact tall buildings impose. Tall buildings should be placed more decisively in the category of requiring 'exceptional design' demanding consideration of worthiness of purpose as well as aesthetics to ensure that such imposition will resonate positively with the population as a whole. Guidance should otherwise be clear in its assertion that the scale and massing of buildings should require them to fit in with the established urban grain in the interests of ensuring that the character and amenity of the broader cityscape is maintained.	Comments noted.	
6583 - Brunswick & North Kite Residents Association (BruNK)	Support	2. The density as well as the height of new buildings should be taken into consideration. Current and pending plans for new developments on the corner of Newmarket Road and East Road are in danger of turning the eastern part of the City into a canyon surrounded by high rise buildings which is out of keeping with its proximity to the Historic Core.	Comments noted.	

Representations	Nature	Summary of Main Issue	Council's Assessment	Action
4.4.14				
6641	Object	Context is the key word here. I would argue here that "appropriately scaled" does not relate to four-storey buildings being built in predominantly two-storey suburbs as is proposed in this document as not requiring 'tall building' status.	Comments noted. The height triggers have been amended to now read six storeys and above for the Historic Core and four storeys and above for the suburbs, in some cases the criteria could be applied at lower heights.	Amend paragraph 1.5.6 and 4.4.12 to state six storeys and above for the historic core and four storeys and above for the suburbs will be used for the trigger for the assessment criteria.
4.4.15				
6599 - English Heritage (East of England Region)	Support	Paragraph 4.4.15: When describing the traditional slender 'incidents' on the Cambridge skyline, it would again be relevant to note the non-functional nature of those 'incidents'.	Comments noted.	
6430	Support	And this is how it should remain. it is to be regretted that tall modern buildings e.g. Botanic House and the Belvedere on Hills Road are being allowed to creep into Cambridge which until recently has been largely free of these boring glass towers. If we have to have such buildings they should be out on the new fringes of the town and not encroach on the conservation area in any way as Botanic House does. They should also be sustainable, 'green' buildings. There is no sign that these buildings are power generating or use sustainable methods of construction.	Support noted.	
4.4.16				
6808 - Cambridge Past, Present & Future	Object	4.4.16 Welcome consideration of roof-top plants however much clearer guidance on acceptance required and that maximum building height must include top of roof-top plant etc see comments made right above	Comments noted. Reference will be made to 3.39 of Policy 3/13 of the Local Plan (2006)	Reference paragraph 3.39 of Policy 3/13 of the Cambridge Local Plan (2006)
6521	Support	(Submitted on behalf of the Nineteen Acre Field RA) We agree. This is an important consideration.	Support noted.	

Representations	Nature	Summary of Main Issue	Council's Assessment	Action
4.4.17				
6557	Object	Vistas and view corridors should not be restricted to ground level. The view from adjoining residential properties at second or third floor level needs to be considered. The criteria also need to allow for night illumination, and "glass-box" office buildings should not be permitted if internal lighting at night is inadequately screened.	Comments noted.	
Criteria 4: Amenity and mi	croclimate	?		
6810 - Cambridge Past, Present & Future	Object	Criteria 4 Need to highlight also the biodiversity opportunities such as green roof, potential for swift/ red start habitats etc (refer also to Nature Conservation Strategy)	Comments noted. A reference will be included to biodiversity opportunities.	Make reference to biodiversity opportunities.
6782 - Cambridge Past, Present & Future	Object	Environmental Impact Energy generating aspects are not adequately discussed and their visual / noise etc impact such as solar/ PV and wind generators. If the guidance is about skylines and not just tall buildings, materials should be an important consideration. The buildings must be capable of delivering low or zero carbon standards.	Comments noted. A reference to the Sustainable Design and Construction SPD will be noted in criteria 4.	Reference the Sustainable Design and Construction SPD in assessment criteria 4.
6486 - Cambridge City Council Design and Conservation Panel	Object	Materials and shadow lines. These are key elements in the evaluation of tall buildings and should be covered in detail within the guidance.	Comments noted. References to materials and shadow lines will be included in criteria 4.	Reference materials and shadow lines within assessment criteria 4.
6472	Support	We agree the definition of tall building and the criteria, except that we want the word 'overlooking' added to the specific list in criterion 4 - Amenity (4.4.18 and 4.4.22). Overlooking is different from overshadowing and should be one of the factors which developers must show they have dealt with.	Comments noted. Overlooking will be included in the criteria.	Include 'overlooking' within the assessment criteria.

Representations	Nature	Summary of Main Issue	Council's Assessment	Action
4.4.18				
6558	Object	Vistas and view corridors should not be restricted to ground level. The view from adjoining residential properties at second or third floor level needs to be considered. The criteria also need to allow for night illumination, and "glass-box" office buildings should not be permitted if internal lighting at night is inadequately screened.	Comments noted.	
6642	Support	This is a critical set of criteria to assess during planning and these issues of loss of aspect, loss of daylight and overshadowing should have far greater prominence throughout the main body of the document. I can see no reference to traffic, transport or local amenities in these criteria which are also amiss. Privacy is also important and is not mentioned.	Comments noted. Privacy and overlooking issues will be included in criteria 4. In response to traffic and transport, a Traffic Impact Assessment (TA) will be required as part of a planning application.	Include Privacy and overlooking issues in criteria 4.
6675	Support	Support strongly but replacing tall by taller.	Comments noted.	
4.4.20				
6809 - Cambridge Past, Present & Future	Object	4.4.20 Accurate wind and shadow studies - highlight suitable reference to work to so that all applications/ applicants follow same and agreed technique	Comments noted. Disagree; a blanket methodology for all buildings is not suitable or reasonable. Some applications will require a greater level of assessment work undertaken.	
6643	Object	The statement that public and private open spaces and amenity areas should not be in shadow for excessive amounts of the day or year is vague and this could be used by a developer to avoid considering these appropriately.	Comments noted. Paragraph 4.4.20 will be amended to read 'shall not be in shadow for significant amounts of time throughout the day and year'.	Amend paragraph 4.4.20 'shall not be in shadow for significant amounts of time throughout the day and year'.

Representations	Nature	Summary of Main Issue	Council's Assessment	Action
4.4.21				
6653	Object	This statement lacks credibility and balance. The report should recognise there are potential problems of poor amenity inherent in the design of highrise flats and should acknowledge these and set standards for avoiding them. Such issues are spacial poverty and sunless outlook (balconies in particular are generally not very usefull and roof terraces benefit only a limited number of luxury penthouses); the separation of childrens play space from the home undermines the proper functioning of a flat as a family home and ther are also issues of social disintigration where inhabitants are cut off from street life.	Disagree. Taller developments can be designed to provide adequate space and good lighting and amenity space.	
4.4.22				
6559	Object	Vistas and view corridors should not be restricted to ground level. The view from adjoining residential properties at second or third floor level needs to be considered. The criteria also need to allow for night illumination, and "glass-box" office buildings should not be permitted if internal lighting at night is inadequately screened.	Comments noted.	
6645	Object	Key matters to address which are not stated here (though accept are mentioned elsewhere) are massing, loss of aspect, loss of daylight, excessive increases in road traffic and congestion and loss of privacy.	Comments noted. Traffic and road congestion will be assessed through a Traffic Impact Assessment (TA) with will be submitted as part of a planning application. Loss of daylight/overlooking will be included in Criteria 4.	Reference the loss of daylight/overlooking in Criteria 4
6759 - Beacon Planning Ltd	Object	4.4.22 does this mean that without these (expensive) studies being submitted with an application the Council will not accept it as valid?	Comments noted. It is not a formal requirement to undertake daylight /sunlight and wind tunnel studies for every scheme. The need for these will be assessed on a case by case basis and be proportionate and reasonable. A simple shadow study using software such as Google sketchUp is not expensive or onerous and is provided on a regular basis by applicants. Likewise, the exact methodology for the production of photomontages should be proportionate to the scale of the development and the sensitivity of its location.	

Representations	Nature	Summary of Main Issue	Council's Assessment	Action
6351	Object	Criteria 4 mentions for the first time in this Guidance the concept of heat "islands". Any concept noted in a criterion should have been addressed previously in the main body of the text.	Comments noted. 'Urban Heat Islands' will be referenced in the Glossary.	Include a definition for 'Urban Heat Islands' within the Glossary and define as (The Dictionary of Urbanism 2005) "An area of warmer temperatures associated with urban development. The effect is caused by the urban fabric retaining and storing heat; by industry, heating, air conditioning and transport; by pollution reducing the radiation of heat; and by drainage reducing the amount of cooling by the evaporation of surface water."
6644	Object	This document for me fails to adequately define what is a 'tall' building (see "significantly taller" in point 1.5.8 which is vague) and therefore this ambiguity could be manipulated to avoid any requirements to consult this document.	The definition of "tall buildings" used within the document is taken from nationally accepted and frequently cited documents e.g. by CABE/English Heritage; this guidance is widely accepted, used, quoted and sufficient for the purpose of this guidance. The definition of "skyline" is less well defined within similar planning documents, if indeed it is described at all. Generally a city skyline comprises a grouping of buildings, structures and landform viewed against the horizon viewed from long (or possibly medium) distance views. However the level nature of Cambridge and its surroundings restricts the number of long and medium distance views of the city skyline. Conversely, the city has an unusually large number of open spaces within very close proximity to its core. Thus some of the iconic skyline views of the city are local, even short distance, views, for example from 'The Backs' looking towards Kings College Chapel. The final sentence in section 1.5.4 referring to skyline shall be removed, as it is too loose. A better-refined definition will be prepared and will note that a view of the city "skyline" is possible from both distant and local points.	Remove the final sentence of section 1.5.4 referring to skyline, as it is too loose. A better-refined definition will be prepared and will note that a view of the city "skyline" is possible from both distant and local points.
4.4.23				
6646	Object	This document argues that most tall buildings are unlikely to gain approval in the historic core and therefore by inference will be built in the surrounding suburbs. Therefore the statement that "tall buildings need to be sensitively located" whist true seems difficult to envisage given that by this document's own admission the suburbs are areas of significantly lower overall height.	Comments noted.	

Representations	Nature	Summary of Main Issue	Council's Assessment	Action			
4.5 Process and technical r	.5 Process and technical requirements						
6522	Support	(Submitted on behalf of the Nineteen Acre Field RA) Some of the specific technical requirements would seem to create difficulties at the public consultation stage for a proposal. Some provision should be made in this section for output formats which, whilst they will not preserve entirely what is in proprietary formats such as AutoCAD, will allow the public to gain a reasonable impression of what is being proposed.	Support noted.				
4.5.1							
6732 - Park Street Residents' Association (PSRA)	Object	4.5.1 OBJECT. We are concerned that some recently approved applications did not take into account the view of them from viewpoints such as public (and private) open spaces. We suggest the inclusion of a bullet point in the box which requires the inclusion of all relevant views of the proposed development from open spaces.	Comments noted. Any proposed development that triggers the assessment criteria will need to identify key viewpoints for assessment including those views from relevant open spaces. Cambridge City Council as part of the pre-application process will agree these views. It may be the case that several views will need to be taken from one particular open space whilst none will be taken from another. Views need to agreed on a case by case basis. Only in limited cases where a particularly tall building is proposed will it be necessary to assess views from all open spaces across the city.				
6676	Object	Viewpoints: list should include all relevant views from across open spaces.	Comments noted. Any proposed development that triggers the assessment criteria will need to identify key viewpoints for assessment including those views from relevant open spaces. Cambridge City Council as part of the pre-application process will agree these views. It may be the case that several views will need to be taken from one particular open space whilst none will be taken from another. Views need to agreed on a case by case basis. Only in limited cases where a particularly tall building is proposed will it be necessary to assess views from all open spaces across the city.				

Representations	Nature	Summary of Main Issue	Council's Assessment	Action
4.5.2				
6733 - Park Street Residents' Association (PSRA)	Object	4.5.2 OBJECT. We wonder if this sentence is sufficiently clear? We suggest that it might be better if it says: 'Depending on the outcome(s) of each of these stage, additional and/or more detailed and more accurate visual representations and information may need to be produced and included as part of the planning process.'	Comments noted. 'Accurate Visual Representations' is a technical term used in relation to producing accurate and verifiable photographic representations of a development proposal, this will be defined within the glossary.	Define 'Accurate Visual Representations' within the Glossary as "a form of computer visualisation that can assist in the assessment of the visual effects of specific proposals on designated views. An Accurate Visual Represenation or Verified View is a tool used in the planning process that helps to inform the effect of a proposal by providing three dimensional visualisations of it. These images can be very realistic and should be accurate with respect to height, form, size and location". (Visual Eyes Media, 2011)
6760 - Beacon Planning Ltd	Object	4.5.2 surely the first piece of work to be undertaking by the promoter of a 'tall building' should be a 'context appraisal' to demonstrate that there is a full and detailed understanding of the issues that will affect the design of the building (including height)? This work would then form part of the Design and Access Statement.	Comments noted. A context appraisal will be included as a first bullet point after 4.5.1	Add 'context appraisal' as a first bullet point for paragraph 4.5.1.
4.5.3				
6734 - Park Street Residents' Association (PSRA)	Object	4.5.3 to 4.5.8 Digital visualisation techniques. OBJECT. Although we welcome the stress here on the use of 3D digital modelling, photomontages etc we wonder if the reference to the need for a clear audit trail to allow images to be verified by a third party provides adequate protection against the submission of misleading images? Perhaps it would be better to say 'verified by an independent third party or parties '? Secondly, we would expect the guidance to state that all such models and images should be made available for public scrutiny at an early stage in the planning process.	Comments noted. Photomontages and Accurate Visual Representations will form part of the supporting evidence for a planning application and will be made available to the public through the usual public consultation means i.e. the City Council website. The Council would not envisage 3D models being made available to the public or statutory consultees but on certain schemes the City Council will request access to 3D models, which have been obtained from developers in the recent past on a number of high profile schemes. The software programs are the only programmes available to the City Council at present. The text will state that AVRs will need to be capable of being verified by an independent third party.	Amend text to state AVRs will need to be capable of being verified by an independent third party.

Representations	Nature	Summary of Main Issue	Council's Assessment	Action
4.5.4				
6600 - English Heritage (East of England Region)	Support	Paragraph 4.5.4 makes reference to 3D computer modelling How will this data be made available to statutory consultees and others when assessing applications? Also, when drafting a policy of this nature, is it appropriate to state specific computer programs? In order to 'future-proof' the policy might a more generic description be preferred?	Comments noted. Photomontages and Accurate Visual Representations will form part of the supporting evidence for a planning application and will be made available to the public through the usual public consultation means i.e. the City Council website. The Council would not envisage 3D models being made available to the public or statutory consultees but on certain schemes the City Council will request access to 3D models, which have been obtained from developers in the recent past on a number of high profile schemes. The software programs are the only programmes available to the City Council at present. The text will state that AVRs will need to be capable of being verified by an independent third party.	Amend text to state AVRs will need to be capable of being verified by an independent third party.
4.5.7				
6560	Object	Vistas and view corridors should not be restricted to ground level. The view from adjoining residential properties at second or third floor level needs to be considered. The criteria also need to allow for night illumination, and "glass-box" office buildings should not be permitted if internal lighting at night is inadequately screened.	Comments noted.	

Representations	Nature	Summary of Main Issue	Council's Assessment	Action
4.5.8				
6677	Object	This does not feel safe enough from fraud. I would like to see "verified by third parties" or better still "independent third parties" I hope the images and models will always be available for public scrutiny at an early stage	Comments noted. Photomontages and Accurate Visual Representations will form part of the supporting evidence for a planning application and will be made available to the public through the usual public consultation means i.e. the City Council website.	Amend text to state AVRs will need to be capable of being verified by an independent third party.
			The Council would not envisage 3D models being made available to the public or statutory consultees but on certain schemes the City Council will request access to 3D models, which have been obtained from developers in the recent past on a number of high profile schemes. The software programs are the only programmes available to the City Council at present. The text will state that AVRs will need to be capable of being verified by an independent third party.	

Representations	Nature	Summary of Main Issue	Council's Assessment	Action
5.0 Appendices				
Appendix A - List of Backgro	ound Doc	ruments		
6601 - English Heritage (East of England Region)	Support	Appendix A - List of background documents. This list might usefully be expanded to include PPS 5 and the two EH publications, 'Seeing the History in the View' and 'The Setting of Heritage Assets'.	Agree, 'Planning Policy Statement 5: Planning for the Historic Environment' (2010), 'Seeing the History in the View' (2011) and 'The Setting of Heritage Assets' (2011) will be included within Appendix A.	Add 'Planning Policy Statement 5: Planning for the Historic Environment' (2010), 'Seeing the History in the View' (2011) and 'The Setting of Heritage Assets' (2011) to Appendix A.
Glossary - to be included in	final draj	ft for consultation		
6647	Object	"Major Development" is classified as "erection of 10 or more dwellings" but this is not in alignment with the SHLAA consultation in which sites with 10 dwellings are considered small in size? "Permeability" is of particular importance to the Newmarket Road area which is acknowledged in the East Area Visioning document as a significant barrier to movement on foot and severs the Petersfield and Riverside communities.	Comments noted. The definition of 'Major Development' is defined in The Town and Country Planning (Flooding) (England) Direction 2007 as: '(a) in respect of residential development, a development where the number of dwellings to be provided is 10 or more, or the site area is 0.5 hectares or more; or (b) in respect of non-residential development, a development where the new floorspace to be provided is 1,000 square metres or more, or the site area is 1 hectare or more.' 'Permeability' will be included in the Glossary and defined as 'Permeability describes the degree to which urban forms, buildings, places and spaces permit or restrict the movement of people or vehicles in different directions. Permeability is generally considered a positive attribute of urban design, as it permits ease of movement by different transport methods and avoids severing neighbourhoods. Areas which lack permeability, e.g. those severed by arterial roads or the layout of streets in cul-de-sac form, are considered to discourage effective movement on foot and encourage longer journeys by car. (Sourced from the Eastern Gate Development Framework Supplementary Planning Document)	Action - Add 'Permeability' to the Glossary and defined it as 'Permeability describes the degree to which urban forms, buildings, places and spaces permit or restrict the movement of people or vehicles in different directions. Permeability is generally considered a positive attribute of urban design, as it permits ease of movement by different transport methods and avoids severing neighbourhoods. Areas which lack permeability, e.g. those severed by arterial roads or the layout of streets in cul-de-sac form, are considered to discourage effective movement on foot and encourage longer journeys by car. (Sourced from the Eastern Gate Development Framework Supplementary Planning Document)

Representations	Nature	Summary of Main Issue	Council's Assessment	Action
6811 - Cambridge Past, Present & Future	Object	Need to define: * "substantially higher" - this needs much clearer definition * Heritage asset (ref 1.5.6) - requires definition as well a clear indication by when they will be listed. What will be the void with no adopted listings in place in the next months and protecting special spaces and buildings? * (College) Backs (ref 3.7+) or sometime listed in document as Backs or back - please check * Commons - some are only commons some are Commons and more protected - which are meant? Should refer to Protected Open Space * Recognised (no z) * Historic Core * Storey heights - commercial (including clinical etc) versus residential - detail clarification	Comments noted. 'substantially higher' is variable and changes between each site. The Council recommend a thorough context analysis is undertaken by the applicants to determine the surrounding building heights. 'Heritage Asset' defined as 'A building, monument, site, place, area or landscape positively identified as having a degree of significance meriting consideration in planning decisions. Heritage assets are the valued components of the historic environment. They include designated heritage assets' (as defined in PPS 5) and assets identified by the Local Planning Authority during the process of decision-making or through the plan-making process (including local listing). The term College Backs will be verified for consistency, using the term 'Backs' rather than 'Back'. The definition of commons will be revised to match the City Council's Open Space Standards. Recognized (para 3.8.1 and 3.12.1) will be changed to recognised. The Historic Core will be included in all relevant figures. Storey heights will be included within the Glossary and defined as 'where commercial floor uses are proposed, the floor to ceiling height will typically be around 3.7m (4m floor to floor height). Upper residential floors are assumed to have a 2.7m floor to ceiling height (3m floor to floor height). Floor to floor heights assume a 300-400mm depth of construction for floors. Consequently a six storey building would correspond to a 19m building height in the historic core and a four storey building in the suburbs would be 13m.'	Add 'Heritage asset' to the Glossary and define as 'A building, monument, site, place, area or landscape positively identified as having a degree of significance meriting consideration in planning decisions. Heritage assets are the valued components of the historic environment. They include designated heritage assets' Replace 'Back' with 'Backs' Replace the definition of commons to match the City Council's Open Space Standards. Recognized (para 3.8.1 and 3.12.1) will be changed to recognised. The Historic Core will be included in all relevant figures. Storey heights will be included within the Glossary and defined as 'where commercial floor uses are proposed, the floor to ceiling height will typically be around 3.7m (4m floor to floor height). Upper residential floors are assumed to have a 2.7m floor to ceiling height (3m floor to floor height). Floor to floor heights assume a 300-400mm depth of construction for floors. Consequently a six storey building would correspond to a 19m building height in the historic core and a four storey building in the suburbs would be 13m.'

Representations	Nature	Summary of Main Issue	Council's Assessment	Action
6825 - Park Street Residents' Association (PSRA)	Object	Glossary OBJECT. There should be a definition stating that in this guidance a storey is defined as so many metres high. For example, in para 1.5.2 buildings over 27m are defined as being approximately nine floors which gives the height of one storey as at least 3 metres. Para 1.5.6 equates seven storeys to 22m, giving one storey at 3.14m and five storeys to 16m, giving one storey at 3.2m. These give a range in height for one storey of between 3.0 and 3.2m which is a fairly tight range and could be used in a glossary definition.	Comments noted. Storey heights will be included within the Glossary and defined as 'where commercial floor uses are proposed, the floor to ceiling height will typically be around 3.7m (4m floor to floor height). Upper residential floors are assumed to have a 2.7m floor to ceiling height (3m floor to floor height). Floor to floor heights assume a 300-400mm depth of construction for floors. Consequently a six storey building would correspond to a 19m building height in the historic core and a four storey building in the suburbs would be 13m.' (This assumes a flat roof with no plant).	Add 'Storey height' to the Glossary and define as 'where commercial floor uses are proposed, the floor to ceiling height will typically be around 3.7m (4m floor to floor height). Upper residential floors are assumed to have a 2.7m floor to ceiling height (3m floor to floor height). Floor to floor heights assume a 300-400mm depth of construction for floors. Consequently a six storey building would correspond to a 19m building height in the historic core and a four storey building in the suburbs would be 13m.' (This assumes a flat roof with no plant).
6602 - English Heritage (East of England Region)	Support	Glossary. It would be helpful if the glossary contained a reference to 'Setting' and I would suggest using the definition set out in PPS 5. This is as follows: 'The surroundings in which a heritage asset is experienced. Its extent is not fixed and may change as the asset and its surroundings evolve. Elements of a setting may make a positive or negative contribution to the significance of an asset, may affect the ability to appreciate that significance or may be neutral.'	Agree. 'Setting' will be included in the Glossary and defined as 'the surroundings in which a heritage asset is experienced. Its extent is not fixed and may change as the asset and its surroundings evolve. Elements of a setting may make a positive or negative contribution to the significance of an asset, may affect the ability to appreciate that significance or may be neutral'. (Sourced from Planning Policy Statement 5: Planning for the Historical Environment).	Add 'Setting' to the Glossary and define as 'the surroundings in which a heritage asset is experienced. Its extent is not fixed and may change as the asset and its surroundings evolve. Elements of a setting may make a positive or negative contribution to the significance of an asset, may affect the ability to appreciate that significance or may be neutral'. (Sourced from Planning Policy Statement 5: Planning for the Historical Environment).
6523	Support	(Submitted on behalf of the Nineteen Acre Field RA) We would like to see "Suburb" added to the glossary. From the contexts in which "suburb" and "suburban" are used in the document we believe this is any part of the city that does not form part of the "historic core", but this is by no means 100% clear, nor have the terms been used consistently (suggesting that there's some uncertainty even amongst the authors of the document).	Comments noted. Agree 'Suburb' will be added to the glossary and defined for the purposes of the guidance as 'all areas within the City boundaries which outside of the Historic Core and include both residential, commercial and mixed used areas'.	Add Suburb to the Glossary and define as 'all areas within the City boundaries which outside of the Historic Core and include residential, commercial and mixed used areas'.

Representations	Nature	Summary of Main Issue	Council's Assessment	Action
6.0 List of Figures				
6.0 List of Figures				
6820 - Cambridge Past, Present & Future	Object	Missing map Explaining where bulky buildings are already located/ consent given.	Comments noted. Disagree this will have any benefit to the scope or purpose of the guidance. The guidance is about tall buildings and the skyline; bulky buildings raise different, though not insignificant, design issues.	
Figure 3.1 Topography				
6812 - Cambridge Past, Present & Future	Object	3.1 Topography Needs more detailing to clearly show low and high points and needs to be combined with strategic views/ Figure 3.6 (as mostly from high points); Milton Rubbish Tip not shown (long-term probably a future public green space?	Comments noted. At the time this map was limited by the topographical data available at the time. Figure 3.1: Topography will be updated to clearly indicate areas of high and low ground.	Amend figure 3.1: Topography to indicate areas of high and low ground using colours.
Figure 3.2 Open Spaces and	d Water B	odies		
6813 - Cambridge Past, Present & Future	Object	3.2 Open Space & Water Bodies Blue colours need better defining a difficult to differentiate	Comments noted. Figure 3.2 will be amended to show clearly the defferent water bodies.	Amend figure 3.2 to clearly show the different water bodies.
Figure 3.3 Heritage Assets				
6814 - Cambridge Past, Present & Future	Object	3.3 Heritage assets	Comments noted. Figure 3.3 will be amended to show the boundaries of the conservation areas	Amend figure 3.3 to show the boundaries of the
& Future		Conservation Areas covering green space areas not shown (e.g. Stourbridge Common, Coe Fen) Historic Core must be shown to highlight difference with those Conservation Areas lying outside	covering protected open spaces.	conservation areas covering protected open spaces
Figure 3.4 City Approaches				
6815 - Cambridge Past, Present & Future	Object	3.4 Missing?	Comments noted.	

Representations	Nature	Summary of Main Issue	Council's Assessment	Action
Figure 3.5 Landmark Build	ings			
6816 - Cambridge Past, Present & Future	Object	* Needs to show height for each building and as such colour coded (referring to storey height and not if in city centre or not) * Suggest changing title of document to tall building (as a landmark building can be much shorter) * Suggest inset to cover the entire "Historic Core" not just the city centre	Comments noted. Agree to include heights in metres. The Urban Design Team will use the Cambridge Building Heights Model to establish landmark building heights as close as practical to the actual height above finished grade. The guidance will note the lack of useable space in many historic tall buildings e.g. church spires.	Include heights of landmark buildings in metres, based on the Cambridge Building Heights model. Guidance to note the lack of useable space in many of the historic tall buildings, e.g church spires.
6577 - Cambridgeshire County Council	Support	The Guidance could consider inclusion of Westminster College tower in Figure 3.5 'Surrounding City Landmark Buildings', as the tower forms a distinctive element in the views to the north west of the City and in the panorama from Castle Mound.	Agree that the Westminster college tower forms a landmark building, and will be included in figure 3.5	Include Westminster college tower in figure 3.5

Representations	Nature	Summary of Main Issue	Council's Assessment	Action
Figure 3.6 Strategic Viewpo	oints Object	Suggestion of additional viewpoints to be included	Comments noted. It is not considered necessary or	Additional strategic views from the M11 and A14
Design and Conservation Panel 6818 - Cambridge Past, Present & Future		within the guidance.	appropriate to list all of these view points within the document; there are simply too many to be of use, and furthermore it should be to the proponent of a tall building to agree with the Council a list of views to be provided for assessment on a case by case basis. It is worth noting that relative distance of each view is taken from the city's historic core. This will be made explicit in the text. It is stated in section 3.13.5 that local views must be considered on a case by case basis as part of the pre-application process and a list of important local views from key open spaces is given. Figure 3.6 shows a number of strategic views which, with the exception of Castle Hill, are taken from the outer edge of the city. Additional strategic views from the M11 and A14 (potentially junction of A14/A10) and a view from the River Cam looking south between the A14 and Baits Bite Lock should be included. Other long distance views from outside the city will be considered on a case by case basis. Views from private buildings including multi-storey car parks, though interesting, are not considered appropriate to include in the guidance, though such views could be provided by developers where proposals are in close proximity to such car parks.	

Representations	Nature	Summary of Main Issue	Council's Assessment	Action
6817 - Cambridge Past, Present & Future Figure 3.7 Photographs	Object	3.6 City Approaches Roads from Fen Ditton as well as Airport Way (west of Teversham) need to be highlighted as major road Green finger approaches - needs to include other strategic open space within city and adjacent - e.g. Milton Country Park, Teversham Drift/Airport area etc (see Cambridge City Council - Nature Conservation Strategy - Figure 2 http://lnr.cambridge.gov.uk/uploads/Nature%20Conser vation%20Strategy%20Sept%2006%20(Section%20A). pdf Also Cambridgeshire Green Infrastructure Strategy http://www.cambridgeshirehorizons.co.uk/our_challeng e/GIS.aspx Label Fen River Way/ Harcomlow/Wimpole Way etc	Comments noted. Horningsea Road/Ditton Lane, Airport Way will be highlighted as key roads. Green finger approaches as shown in figure 3.4: City Approaches will be amended to include local nature reserves/conservation sites and other strategic opens spaces as shown in figures 1 and 2 of the Cambridge City Nature Conservation Strategy (2006) http://lnr.cambridge.gov.uk/uploads/Nature%20Conservation%20Strategy%20Sept%2006%20(Section%20 A).pdf Fen River Way, Harcomlow, Wimpole Way will be included figure 3.6 Strategic Viewpoints.	Amend figure 3.4 to include local nature reserves/conservation sites and other strategic opens spaces as shown in figures 1 and 2 of the Cambridge City Nature Conservation Strategy (2006) Fen River Way, Harcomlow, Wimpole Way will be included figure 3.6 Strategic Viewpoints.
6483 - Cambridge City Council Design and Conservation Panel	Object	Images. The photographs show distant views where the eye is drawn to light coloured or distinctive buildings. This may place too much emphasis on the negative impact of tall buildings. Although the Panel appreciate the technical reasons behind the production of a mostly word-based document, more images, possibly illustrating good and bad examples of tall buildings in the city would be helpful.	Comments noted. The final version of the document will include photographs, illustrations and graphics to allow the reader to better interpret the text.	
6819 - Cambridge Past, Present & Future	Object	3.7 Photographs Need to have good & bad examples of tall/ massive buildings in Cambridge Clearer detailing of façade detailing - unsightly façades such as West Cambridge cladding are less desirable to edges of Green Belt/ countryside/ and other green spaces. It is essential to highlight examples of good and bad façade detailing.	Comments noted.	