



By Online Planning Register

31/10/2022

Dear Mary

Cambridge Past, Present & Future
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Response to 22/03811/FUL: Installation of photovoltaic panel arrays on the north and south slopes of Kings College Chapel and related infrastructure.

Cambridge Past, Present & Future is Cambridge's largest civic society. We are a charity run by local people who are passionate about where they live. We operate in the greater Cambridge area and working with our members, supporters and volunteers we:

- Are dedicated to protecting and enhancing the green setting of Cambridge for people and nature.
- Care about Cambridge and are an independent voice for quality of life in the strategic planning of Greater Cambridge.
- Are working to protect, celebrate and improve the important built heritage of the Cambridge area.
- Own and care for green spaces and historic buildings in and around the city for people and nature, including Wandlebury Country Park, Coton Countryside Reserve, Cambridge Leper Chapel & Barnwell Meadows, Bourn Windmill and Hinxton Watermill.

Cambridge Past, Present & Future has considered this application and wishes to make the following comments, which we would be grateful if you take into account when making your decision:

Process

We welcome the efforts the college is planning in order to reduce its carbon footprint and the serious consideration that King's College has given to this proposal and the approach that they have taken:

- They have carried out Decarbonisation Report as part of the planning application. This shows the efforts that the college will make across their college buildings to reduce carbon, showing that the proposal for solar panels is part of bigger plan. However we note that the panels would only reduce the College's carbon emissions by 1.4% compared to other energy efficiency measures¹. We also note that no information is supplied on the wider property holding of King's College and it would be useful to know its approach to, for example, any commercial properties it owns.
- Given the relatively small contribution that the solar panels will make to reducing the college's carbon footprint, we assume it would not have been the first project that they would ordinarily have carried out, however the need to carry out repairs on the roof has meant considering this option ahead of other carbon reduction projects.
- Sample panels have been installed to aid understanding of the visual impact.
- A Planning and Heritage statement.

We hope that the approach taken by the college sets a precedent for any future applications for solar panels on historic buildings in the historic core of Cambridge.

¹ Figure 42 Decarbonisation Report, Max Fordham (2022)

Visual Impact

We commend the Visual Impact Assessment for having an appreciation of the Cambridge Skyline. Appendix F of the Adopted local plan identifies King's College Chapel as one of the 'treasured landmarks' of the Cambridge skyline. We do however consider that there are some significant public viewpoints which have been omitted and should be included in an amended Visual Impact Assessment.

- a) The view from Silver Street along Queens' Lane,
- b) The longer view from the riverside path opposite the Garden House Hotel.

Policies 29, 61 and 63 are supportive of environmental improvements and energy generation subject to the impact on the heritage asset being minimised. We consider that the low angle of the roof and the parapets significantly minimises the visual impact of the panels. However we do appreciate the points made by Historic England in their representation (12 October 2022) that currently, when the roof is visible, the lead provides a matt, unchanging background. With solar panels though, the 'colour' of the roof would change with the panels reflecting the light and dark of changing skies. Although when one is admiring the building, one looks at it as a whole, with all its architectural features, the fact that the view of the roof would look at times out of place by the use of 21 century materials, may draw the eye to the roof over other features.

Decision making

The Council will have to weigh the harm to the significance of the Chapel against the benefit of increased renewable energy. There appear to be key factors that are particular to this development – the piggybacking on the roof repairs, the limited visual impact and being part of a wider plan to reduce energy across the college estate. Although we consider that there is modest visual impact on the building, it is being made on a building of great significance. Should the Council be minded to approve the application, the reasons for the decision must avoid setting a precedent for the installation of solar panels on other historic buildings in Cambridge, where the circumstances may be very different from this application.

The importance of King's College Chapel locally, nationally and internationally means that we consider that this decision must be made by elected Councillors and not be delegated to officers.

If the Council is minded to approve the application we suggest that a condition is imposed that limits the permission to the lifetime of the panels and that a new permission would be required for their replacement, even if the development was like for like. This would enable the impact on the significance of the Chapel to be assessed again with the knowledge of their visual impact and take into account any improvements and changes to renewable energy technology.

Sequential approach to identifying suitable locations for renewable energy

NPPF paragraph 155 requires plans to provide a positive strategy for renewable energy and consider identifying suitable areas for renewable and low carbon energy sources. If one were to apply a sequential approach to identifying suitable locations, the historic core of Cambridge and King's College Chapel would likely be the last places for this, because of the impact on heritage. Yet, the Council are being asked to consider this application when there is very little other renewable energy on rooves in Cambridge and in the knowledge that there are thousands of more suitable buildings than King's College Chapel. We would encourage the Council to develop a strategy towards renewable energy which directs renewable energy developments to less harmful locations such as retail parks, car parks and modern buildings and prevents proliferation of panels on significant historic assets – particularly in the historic core, where the roof-scape is still largely unharmed and is an important part of what makes Cambridge such a remarkable city.

Cambridge PPF would welcome working with GCSPS in developing such a strategy as part of the preparation of the Local Plan.

I trust that you will take our comments into consideration.

Yours sincerely

Sarah Nicholas

Principal Planning Officer