

Design and Placemaking Team,
Chief Planner Directorate,
Ministry of Housing, Communities and Local Government,



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Response to consultation on Design and Placemaking Planning Practice Guidance

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 Hinxtton Watermill.

Cambridge Past, Present & Future (CPPF) support the overarching ambition to elevate design standards, however, we wish to highlight several critical areas where we consider the guidance requires further refinement to be effective in practice.

1. Resource Implications for Local Authorities

CPPF is concerned about the practicalities of implementing a 161-page guidance document. For local authorities that are not historically 'design-oriented,' the transition will require significant professional resources and expertise. We ask for clarity on what support or funding will be provided to ensure these standards are not merely aspirational but enforceable.

2. Strengthening the 'Seven Identity Points'

With reference to the framework of identity and context, we believe the guidance must be more rigorous in how it defines 'Identity' to prevent generic 'pattern book' developments.

- **Local Essence:** Developers frequently fail to capture the unique character of Cambridge. The guidance should require a mandatory 'Context Appraisal' that goes beyond surface-level aesthetics.
- **Regional Distinction:** We must avoid a reality where a development in Watford is indistinguishable from one in Newcastle or Cambridge.
- **Identity vs. Standardisation:** The seven points of identity should not be treated as a checklist for 'anywhere' design, but as a tool to enforce site-specific character.

3. Biodiversity and Environmental Protection

While the guidance encourages 'caution' regarding ancient woodlands and rare species, the Committee feels the language is insufficiently robust.

- **Preservation over Mitigation:** Guidance should prioritise the avoidance of development on sensitive sites rather than focusing on design mitigation.
- **Decision-Making:** We seek more explicit instructions on how 'caution' translates into a 'refusal of permission' when biodiversity is at risk.

4. Tall Buildings and Density

The current draft remains 'light' on the complexities of tall buildings. Given that this is a frequent point of contention in planning committees, we recommend more detailed criteria regarding their impact on historic skylines and the micro-climate of the surrounding public realm.

5. Implementation and Visual Tools

While we appreciate the use of 'good and bad' visual examples (tick-boxes), we remain sceptical about how these will influence the day-to-day work of planning officers. We would welcome more rigorous frameworks for how these design codes will be weighed against other planning considerations.

I trust that you will take our comments into consideration.

Yours sincerely

Sarah Nicholas

Principal Planning Officer