Greater Cambridge Share Planning Service

By Online Planning Register

17/11/2026

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Response to 25/02161/FUL: Demolition of 1970s library and replacement with new library at Christ's College, St Andrews Street, Cambridge.

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.

Context of this Representation:

In our initial representation on this application, CPPF did not formally object, instead raising targeted layout and design queries. While CPPF continues to support the principle of Christ's College improving its academic facilities, the High Court's quashing of the Council's original decision requires the proposal to be evaluated entirely afresh. In re-determining the application, the Local Planning Authority must give proper consideration to Historic England's advice, while assessing the scheme against the revised National Planning Policy Framework (August 2026) and the expanded body of community and technical evidence.

Assessment under the August 2026 NPPF (Policies HE5 and HE6):

Since the application was submitted, the revised National Planning Policy Framework (August 2026) has been published and now forms a material consideration of critical importance in determining this proposal.

The updated Framework introduces a restructured approach to heritage decision-making, dispensing with the previous 'less than substantial harm' test in favour of the distinct assessment and balancing requirements set out in Policies HE5 and HE6.

Under Policy HE5, the applicant is now explicitly required to submit evidence assessing the significance of the affected designated heritage assets (including the contribution made by their setting) and identifying whether the proposal will result in a positive effect, no effect, harm, substantial harm, or total loss.

Furthermore, where any harm is identified, Policy HE6 requires decision-makers to apply substantial weight to the conservation of the designated heritage assets and undertake a rigorous balancing exercise against public benefits.

Because the existing Heritage Statement and statutory consultee responses were prepared under the superseded 2024 Framework, we consider that the applicant must submit updated heritage evidence demonstrating compliance with Policies HE5 and HE6. The Local Planning Authority must also formally request Historic England to assess the scheme against these new national policy tests prior to determination. We consider that the Conservation Officer's response of 9 November 2026 does not provide sufficient explanation and justification of their assessment against the new HE5/HE6 tests.

Amplifying Statutory Concerns and Conflict with Local Plan Policy 61:

Historic England advise that the proposed building "feels too big" and is "overdominant" on its site. While the removal of the 2016 scheme's full basement was framed as a sustainability benefit, it has forced the building to expand upward to maintain internal capacity.

This resulting bulk causes multi-layered harm to highly sensitive, designated heritage assets and stands in conflict with Policy 61 (Conservation and Enhancement of Cambridge's Historic Environment) of the Cambridge Local Plan:

- **Failure to Preserve or Enhance:** Policy 61 requires that development proposals preserve or enhance the significance of the city's heritage assets, including their settings. Historic England notes that the decision to lift the wall level to the turret level makes the structure increasingly overbearing in its immediate relationship with the Grade I listed Bodley Library. Dominating the visual setting and spatial hierarchy of a Grade I asset directly affects a key element of its significance, failing Policy 61 and requiring a formal determination under Policy HE5 as to whether this constitutes substantial harm.
- **Inappropriate Street Profile:** Historic England warns that the massive ventilation stacks and chimneys are not proportionate to the more modest chimneys of Christ's College. Without a substantial reduction, they will challenge the visual prominence of the historic chapel turret on the skyline and overwhelm the modest scale of Christ's College's historic streetscape, notably Christ's Lane — harming the character and appearance of the Central Conservation Area.
- **Weighing Heritage Harm:** The design results in certain levels of harm across multiple assets, including the setting of the Grade I listed Bodley Library, Bath Court, and the Central Conservation Area. Under NPPF Policy HE6, decision-makers must give substantial weight to the conservation of designated heritage assets. If the overbearing massing seriously affects key elements of the Grade I listed setting and is categorised as substantial harm, Policy HE6(5) and HE6(6) require that such harm be wholly exceptional and refused unless necessary to achieve substantial public benefits that outweigh it. Even where harm falls below the substantial threshold under Policy HE6(4), the substantial weight afforded to heritage conservation requires clear and convincing justification that the identified harm is necessary and outweighed by demonstrable public benefits—a test that must be transparently evidenced in the Officer's assessment.

Conclusion:

A deliverable, contextually sensitive alternative that honours the human scale of Christ's Lane is entirely achievable. Cambridge City Council has a duty to give special regard to preserving listed settings and enhancing conservation areas. We urge the applicant and Council to recognise the impact on the listed buildings and character and appearance of the Conservation Area and negotiate a lower and less bulky design.

Yours sincerely

Sarah Nicholas

Principal Planning Officer