



Historic England

**PLANNING ACT 2008 (AS AMENDED) – SECTION 89 AND THE
INFRASTRUCTURE PLANNING (EXAMINATION PROCEDURE) RULES 2010 (AS
AMENDED) - RULE 8**

**APPLICATION BY ANGLIAN WATER SERVICES LIMITED FOR AN ORDER
GRANTING DEVELOPMENT CONSENT FOR THE CAMBRIDGE WASTE-WATER
TREATMENT PLANT RELOCATION PROJECT
APPLICATION REF: WW010003**

**REPRESENTATIONS OF THE HISTORIC BUILDINGS AND MONUMENTS
COMMISSION FOR ENGLAND (HISTORIC ENGLAND)**



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Summary

Historic England's written representation considers in more detail concerns we have already raised in relation to the impact of the Cambridge Waste Water Treatment Plant relocation project on the significance of a number of highly designated heritage assets through development within their setting. In particular these are the Grade II* listed building Biggin Abbey, and the conservation areas of Bait's Bite Lock, Horningsea, and Fen Ditton.

In coming to this view we have taken into consideration specific historic environment visualisations chapter and the Historic Environment Chapter of the Environmental Statement. We have also put this position in relation to Planning Policy, and we recommend that in determining the application the examining authority should take into consideration the significance of the heritage assets and weigh the harm which would be caused to their significance against the public benefits of the proposed development. Consideration should be given as to whether the applicant has taken all possible steps to avoid the harm, or if this is not deemed possible by the examining authority, to minimise the harm that the development would cause.

1. Introduction

- 1.1. The Historic Buildings and Monuments Commission for England (HBMCE), known as Historic England, are the Government's adviser on all aspects of the historic environment in England - including historic buildings and areas, archaeology and historic landscape – and have a duty to promote public understanding and enjoyment. HBMCE are an executive Non-Departmental Public body sponsored by the Department for Digital Culture, Media and Sport (DCMS) and we answer to Parliament through the Secretary of State for Digital Culture, Media and Sport. Our remit in conservation matters intersects with the policy responsibilities of a number of other government departments – particularly the Ministry of Housing, Communities and Local Government, with their responsibilities for land use planning matters.
- 1.2. In previous correspondence in relation to this project and in our Section 56 Representation we noted that the applicants had provided a comprehensive Environmental Statement, however we identified that this development had the potential to impact upon the historic environment, and that this impact would be significant in relation to a number of heritage receptors and in relation to EIA policy. We also stated that a number of specific points would be addressed in our full Written Representation in relation to the Historic Environment sections of the Environmental Statement. This letter will





therefore provide that additional detail in relation to the impact of the proposed development

- 1.3 We have previously highlighted that whilst there are no designated heritage assets within the actual site, there are various heritage assets in relative proximity whose settings may be affected. In terms of our statutory remit there are 11 grade I and II* listed buildings; 6 Conservation Areas and 1 Scheduled Monument within a 2 km radius of the application site.
- 1.4 We note that an initial study area of 1km radius has been used to identify core baseline conditions for heritage assets, along with a supplementary wider study area based upon ZTV information. This identifies heritage assets beyond the core 1.5km study area that may be impacted as a result of the physical presence of the proposed development and/ or by other associated environment effects that affects their appreciation and heritage significance. We are satisfied that this is an appropriate assessment methodology
- 1.5 We do not wish to comment on grade II listed buildings or individual non-designated heritage assets as these are outside the remit of Historic England. We are content to defer to the Local Planning Authorities and their conservation and archaeological advisors on those matters and we refer the examining authority to their submissions as relevant.

2. Comments in relation to Environmental Statement: Chapter 13 – Historic Environment ; Appendix 15.1 :Photomontages

- 2.1. As discussed above, Historic England’s concerns relate the impact of the proposed waste-water treatment facility upon the setting of Biggin Abbey and the conservation areas of Bait’s Bite Lock, Fen Ditton and Horningsea
- 2.2. **Biggin Abbey** is a late C14 farmhouse with C17 additions and alterations, and is the surviving part of the summer residence of the Bishop of Ely and was visited by Henry III Edward I and Edward II. It is therefore of great historic interest and was once moated, lending it additional archaeological interest. The building sits on elevated ground allowing long views across to the west and south and also lies within the Bait’s Bite Lock Conservation Area. The significance of the asset is reflected by way of its grade II* listing.
- 2.3. **Bait’s Bite Lock Conservation Area** is centred, as its name would suggest, on the River Cam lock, which dates from the 1700. It includes the river on its western side and the lock which is listed at grade II, and a handful of other buildings, most of which are historically associated with the lock and/or river





in some way. These provide evidence of the working character that would once have created a small hub of activity at this point of the river, although the current day character is largely characterised by verdant watermeadows with drains and open fenland that is now in agricultural use. The conservation area adjoins the Fen Ditton Conservation Area to the south. Biggin Abbey (listed grade II*) also falls within the south-eastern corner of Bait's Bite Lock Conservation Area.

- 2.4. **Fen Ditton Conservation Area** takes in the linear village of Fen Ditton which save for the exception of a few modern houses is almost completely free of backland development. It is bordered by the River Cam to the west and by fenland to the east. The railway line forms the south-western boundary. It has a rural character with a riverside setting. The riverside spaces are open areas of grassland interspersed with very few buildings and some houseboats. The riverside creates a very definite edge to the village. Approaching from the west, the church of St Mary the Virgin and the Old Rectory form focal points above the meadows from behind a canopy of trees.
- 2.5. The streetscene and townscape is of exceptional quality due to the high proportion of good quality buildings and spaces. The rhythm of the gables and varying eaves lines and canopies of large trees overhanging the High Street are very picturesque. The focal point of the village is formed by the grouping of the church, old rectory and the grass island containing the war memorial, together with the enclosing trees, buildings and surrounding spaces.
- 2.6. The village has two distinct 'character areas' – the site of the original settlement at Green End Road and the expanded Medieval Village which runs from High Ditch Road to the church.
- 2.7. **Horningsea Conservation Area.** Horningsea is a small village with buildings that are mostly arranged alongside the Fen Ditton to Waterbeach Road, together with two narrower ancient lanes that lead down to the river to the west.
- 2.8. The southern part of the village has cottages and public houses, many at right angles to the road with boundary fences, railings and long walls. The character changes at the northern end of the village where fine gault brick walls surrounding the large farms define the roads to the west, with farm buildings and fences lining the road to the east. The scale of houses is predominantly 1.5 to 2 storeys with gault brick being the pre-eminent building material.





- 2.9. In many places large mature trees behind the walls enclose views and allow only glimpsed views of the substantial farmhouses and groups of buildings. Farm groups are a defining characteristic of the village. The buildings themselves are well detailed and the consistency of materials gives the village a strong sense of homogeneity.
- 2.10. The view of the church from the north rising above the single-storey agricultural buildings is a particularly important one. The boundary walls are also an important feature in townscape terms along with the grouping with the Old Rectory and the mature trees in the grounds between the two.

Application site

- 2.11. The main application site is currently undeveloped agricultural land that is generally low-lying and typical of the local fenland landscape. As part of the wider setting of Biggin Abbey it contributes to its significance by reflecting its historic function as a former farmhouse and country residence, and views and visual connections with the surrounding farmland contribute to the appreciation and understanding of the asset.
- 2.12. The site also forms part of the wider setting of Bait's Bite Lock, Fen Ditton and Horningsea conservation areas, and speaks to their significance as rural fenland settlements that historically relied on the rural economy for their prosperity. Although the wider landscape has been compromised to some extent by C20 development – particularly transport and power/communications infrastructure, its general character and appearance is largely unchanged and the views out across the open landscape make a positive contribution to the essential rural character of these conservation areas.

Impacts of the Development

- 2.13. The development site covers an area of approximately 22 hectares and includes a water treatment facility to be contained within an earth bund and comprising various structures, the tallest of those being the two digesters which we understand would be 26 metres in height. The development would also include various temporary structures and works compounds etc that would be extant for the duration of the construction period.
- 2.14. We consider that the introduction of the proposed waste-water treatment facility in this location would permanently alter the open, arable character and appearance of the existing landscape to a significant degree. Whilst the proposed earth bund would screen the facility to some degree, we note that,



various, taller elements of the plant, such chimneys, the digester towers and flare stack etc would extend above the top of the bund and are likely to be apparent in some views – as indicated in the various photomontages (ES Vol 4 CH15appendix 15.1). We are concerned that the proposed facility could end up having the appearance of a large-scale industrial site which is not characteristic of the area.

Impacts from construction

- 2.15. We note the assessment of the construction effects and the likely impact in terms of setting that would result from the development. This includes consideration of the visual impact from the presence of works compounds, construction machinery and plant, as well as the associated environmental effects from associated construction activity – such as increased noise, dust and vehicle movement. We accept the conclusions of the assessment and acknowledge that the impacts would be minor to moderate and temporary.
- 2.16. We also note the proposed mitigation measures that would be applied during construction which includes screening of works compounds, and monitoring of noise and vibration levels. This would go some way to managing any negative effects from the construction of the facility and we welcome their inclusion to help reduce any negative effects.

Permanent impacts from facility -post construction

- 2.17. The presence of the proposed facility, which includes various structures of significant scale will result in a fundamental change to the setting of those heritage assets that we have identified. We believe that the facility would therefore be apparent in views from both Bait's Bite (easterly views) and Fen Ditton Conservation Areas (northerly views from High Ditch Road); as well as in easterly views towards the site that take in Biggin Abbey – as demonstrated in the submitted photomontages -particularly images 1 and 2.
- 2.18. We believe that the facility would result in erosion of the current fenland landscape character to some degree which would affect the way in which the aforementioned heritage assets are experienced and appreciated due to the introduction of an industrial feature that is uncharacteristic of the immediate locality.
- 2.19. We appreciate that the visual impacts might be mitigated in certain respects and to some extent by way of a comprehensive scheme of landscaping, and there may indeed be some virtue in these measures. However, we are also mindful that as this would involve significant changes to local topography, and the introduction of dense tree-planting - both of which are somewhat at odds





with the flat, open fields that typifies the fenland landscape, that this would have an unfortunate effect in terms of interruption of certain long views – in particular easterly views from Biggin Abbey and its immediate environs (photomontage 2).

3. Policy Context

- 3.1. In relation to Historic Environment Policy the National Planning Policy Framework requires that when considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset's conservation (and the more important the asset, the greater the weight should be). This is irrespective of whether any potential harm amounts to substantial harm, total loss or less than substantial harm to its significance, paragraph 199. It continues that any harm to, or loss of, the significance of a designated heritage asset (from its alteration or destruction, or from development within its setting), should require clear and convincing justification, paragraph 200. The significance should be taken into account when considering the impact of a proposal on a heritage asset, to avoid or minimise any conflict between the heritage asset's conservation and any aspect of the proposal, paragraph 195. Where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal, paragraph 202.

4. Conclusion

- 4.1. We have provided detailed advice in our written representation about the scheme, the assessment and documents that have been submitted for examination.
- 4.2. We have some concerns in terms of the impact of the proposed waste-water treatment facility on the significance of the designated heritage assets as described above.
- 4.3. We have concluded that overall the development would result in harm to these designated heritage assets. We have however concluded that this would equate to less than substantial harm in NPPF terms.
- 4.4. Therefore, in accordance with planning policy the harm would need to weighed against the public benefits of the proposal. As stated in the NPPF





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and harm required clear and convincing justification and we would want to be reassured that should the DCO be granted the balancing exercise has been undertaken and the public benefits can be clearly demonstrated to outweigh his harm.

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