



To Whom It May Concern,

I write as a Professor of the University of Cambridge and as a representative of the Christ's Lane Action Group (CLAG), acting in the public interest to protect Christ's Lane and the distinctive character of Cambridge's historic core. On behalf of CLAG, I submit this formal objection to Application Ref. 25/02161/FUL concerning Christ's College's redevelopment proposal.

The proposed Christ's College redevelopment, situated within the Central (Historic Core) Conservation Area, has become a significant point of contention, symbolising both a systemic failure in planning governance and a direct threat to the heritage significance, and public amenity of Christ's Lane.

This submission sets out the principal objections of CLAG to the proposal. It demonstrates that the application, as advanced under the current Planning Performance Agreement (PPA) framework, breaches multiple provisions of the National Planning Policy Framework (NPPF) and Cambridge Local Plan, undermines procedural integrity, and disregards principles of transparency, evidence, and community participation which are essential to lawful planning practice.

The concerns raised proceed not from opposition to development itself but from the demonstrable failure of this scheme to uphold adopted policy. CLAG submits that compliant alternatives exist that would meet Christ's College's genuine functional needs while preserving the architectural scale, environmental quality, and civic character that make Christ's Lane a valued part of Cambridge's historic centre.

1. PPA Failures — Systemic Policy Breaches and Procedural Defiance

1.1 Governance and Transparency

The year-long Planning Performance Agreement process between Christ's College and Cambridge City Council has produced material procedural irregularities and multiple lapses in governance. Far from fostering openness and collaboration, the PPA operated in conditions of confidentiality, insulating the applicant from external scrutiny and enabling departures from statutory policy to proceed unchecked.

This approach conflicts directly with the Planning Performance Agreement Charter (PAS, 2020), which requires transparency in process and equitable involvement of stakeholders. The exclusion of the public from meaningful participation contravened NPPF § 39 and § 92(a), both of which emphasise early and inclusive community engagement.

Repeated requests from residents and local groups for access to relevant information — including fundamental details such as the proposal's height, scope, and changes from the 2016 consented scheme — were left unanswered. Despite explicit encouragement from Council planning officers to pursue open consultation, the College declined to engage. The so-called "neighbourhood consultation" was restricted to a limited and unrepresentative subset of Christ's Lane residents, and the views submitted were subsequently misrepresented in the applicant's own documentation.

This pattern of exclusion, supported by unanswered correspondence and the absence of any public disclosure of material evidence, stands in clear contradiction to procedural fairness requirements established in national

policy. The PPA, rather than ensuring a proportionate and accountable planning process, created a closed environment devoid of independent review or factual challenge.

1.2 Suppression of Policy Context — Historic Core Appraisal 2016

During the PPA process, the applicant asserted that the Historic Core Appraisal 2016 (HCA) contains no analysis relevant to Christ's Lane. This claim is demonstrably incorrect. The HCA identifies Christ's Lane and Drummer Street as significant components of the Conservation Area and essential to the pedestrian connectivity of the city centre.

Failure by the PPA officers to verify submissions against the HCA represents a breach of NPPF § 16, which requires decision-making to be informed by adequate and proportionate evidence. The omission of this adopted evidence-base blinded internal evaluation to the scheme's likely impact on both heritage significance and the public realm, directly undermining Local Plan Policies 56, 58, 60, and 61.

1.3 Neglect of Local Plan Policy 10 — Christ's Lane as a Public Route

Policy 10 of the Cambridge Local Plan designates Christ's Lane as a principal pedestrian route central to the coherence of the city centre. In failing to secure or assess Pedestrian Management Plans and Traffic Management Plans required by Policy 80, Highways Authority Planning Guidance (2019), and NPPF §§ 92 and 110–112, the PPA process permitted an unsafe and non-compliant design to progress unchecked.

This procedural omission compromises both pedestrian safety and lawful route operation. By excluding public input into the project's direct effects on accessibility, the PPA breached NPPF § 35, which underpins the fairness and transparency of plan assessment.

1.4 Evasion of Local Plan Policy 60 — Tall Buildings and the Skyline Test

No evidence was provided that the proposed building was evaluated against Local Plan Policy 60 (Tall Buildings and the Skyline), despite it plainly exceeding the existing skyline when viewed from Christ's Lane and St Andrew's Street. The omission of comprehensive Skyline, Massing, and Townscape Visual Impact Assessments (TVIA) contravenes both Policy 60 and NPPF § 194.

This failure enabled a building of excessive height and bulk to advance without appropriate heritage or visual scrutiny. The resulting structure would dominate and overshadow the Lane, conflicting with the policy requirement for human-scale development and proportional relationship between building height and street width.

1.5 Violation of Local Validation Requirements — Daylight and Sunlight Studies

The Local Validation Checklist requires Daylight, Sunlight, and Overshadowing Assessments at pre-application stage. No such studies were produced under the PPA, in breach of BRE (2011) and Local Plan Policy 58 (Altering Buildings). Later submissions remained incomplete, omitting Christ's Lane until after public challenge.

Even when partially included, modelling was restricted to selective seasonal data excluding winter conditions critical to public use. This represents a defective evidence base that concealed the true extent of overshadowing. Policy 58 explicitly forbids alterations that unreasonably diminish daylight within the public realm — a threshold clearly crossed here.

1.6 Misrepresentation of Community Evidence

Objections recorded during the limited consultation were consistently misrepresented by the applicant. Community submissions identified central concerns of public amenity, daylight, and pedestrian safety. These were reframed within the College's reporting as matters of private view or neighbour interest — a distortion that erased legitimate civic objection from the formal record.

1.7 Conclusion to Section 1: PPA Failures — Systemic Policy Breaches and Procedural Defiance

Taken collectively, these failures reveal a systemic dereliction of procedural duty within the PPA framework. Safeguards for transparency, validation, heritage review, and fair consultation were bypassed, producing non-compliance across Local Plan Policies 10, 56, 58, 60, 61, and 80, and contraventions of NPPF §§ 16, 35, 39, 92, and 110–112.

It is therefore submitted that all outputs derived from this PPA process are procedurally tainted and cannot form a lawful basis for determination. The Council is invited to re-examine the application in light of these fundamental defects and to restore transparency and public accountability to the assessment process.

2. Harming Christ's Lane: The Canyon Effect and Erosion of Public Amenity

This development represents a fundamental failure to uphold the established character and essential role of Christ's Lane, thereby contravening core requirements of the Cambridge Local Plan. Christ's Lane functions not merely as a thoroughfare but as a deliberately designed public route, re-established by the Council as an integral component of the Bradwell's Court redevelopment to ensure permeability between the historic core, the primary retail area (Grafton/Fitzroy/Burleigh Street), the principal bus transport hub at Drummer Street, and the open public space of Christ's Pieces. The proposed development's scale, massing, and resultant blank frontage will irrevocably transform this lively pedestrian link into a constricted and oppressive passageway, fundamentally eroding public amenity. This outcome directly conflicts with established planning principles and breaches **Cambridge Local Plan Policies 10, 56, 58, 60, and 61**.

2.1 Breach of Policy 10: Failure to Enhance the Public Realm

Policy 10 mandates that city centre developments must enhance the public realm and strengthen urban connections. Christ's Lane was reinstated precisely for this purpose: to restore permeability between the historic core, the retail nexus, the bus station, and Christ's Pieces. Both the 2002 Bradwell's Court Redevelopment Brief and the 2016 Historic Core Conservation Appraisal identify it as a vital pedestrian corridor, contingent upon openness, daylight, and active street frontages. Planning officers involved in the Bradwell's Court Redevelopment explicitly cautioned against "canyon-like oppressive proportions," while the Historic Core Conservation Appraisal stressed the importance of "human scale and active frontages." This proposed scheme fundamentally negates these principles, actively destroying the very qualities Christ's Lane was designed to preserve.

The contrast with the successful 2008 Bradwell's Court redevelopment, recognised in the English Heritage case study 'Valuing Places: Good Practice in Conservation Areas', is instructive. That project reinstated an historic pedestrian route, restored permeability, and crucially, responded to the grain, scale, and materials of the conservation area. Its success stemmed from reinforcing local distinctiveness and respecting Cambridge's urban fabric. The current proposal inverts these principles, substituting an overpowering mass of built form for openness and directly contravening the exemplary practice highlighted by English Heritage.

2.2 Oppressive Scale and the Loss of Human Experience

The development imposes a sheer fourteen-metre-plus wall within a six-metre-wide lane, generating an enclosure ratio of 2.3:1. This ratio significantly exceeds that of historic thoroughfares such as Trinity Street and Rose Crescent (approximately 1.5:1), resulting in a dark, canyon-like corridor devoid of natural light,

air, and sky-view. As highlighted by Ward Councillor Tim Bick, the "canyon effect" is a substantial concern, with the new building creating an "equally high building on the other side" that will "condition the way that Christ's Lane is experienced."

Whereas the 2008 Bradwell's Court Redevelopment scheme enhanced pedestrian access, this application achieves the opposite, creating a spatial experience that will discourage movement and suppress activity. **Policy 56** demands human-scaled, comfortable public spaces; this proposal offers a fortress-like wall and superficial gestures rather than genuine public interaction. This profound disregard for human scale and amenity directly opposes the principles of constructive conservation advocated in English Heritage guidance.

2.3 Overshadowing, Dominance, and Heritage Harm

Policy 58 prohibits unreasonable overshadowing and visual domination. Even the applicant's flawed daylight analysis concedes significant light loss, plunging the lane into shadow and visually dominating it with an elevation twice its width. **Policy 61** requires developments to sustain and enhance the significance of Conservation Areas; this scheme dismantles the very attributes—light, openness, animation—that define Christ's Lane's character. The 2002 Joint Planning Brief stipulated a maximum height of 11.4 metres with appropriate setbacks to prevent a canyon effect. This proposal, exceeding 14 metres, contravenes those established limits, inflicting precisely the harm planners sought to avert. In contrast, the 2008 Bradwell's Court redevelopment reinforced the city's historic street pattern through proportionate height, ample daylight, and continuous human activity at street level, thereby embodying good conservation practice.

2.4 Misrepresentation and Policy 60 Non-Compliance

Policy 60 concerning Tall Buildings and the Skyline is directly breached. The assertion that the scheme falls outside its scope is unfounded; the building will break the established skyline, create undue enclosure, and eliminate sky-view. The applicant's visual evidence is demonstrably incomplete and misleading, omitting key sightlines, distorting perspective, and minimising perceived bulk. This contravenes **NPPF §§130, 134, 194, 199–202** and relevant Local Plan policies. Such inaccurate evidence prevents proper statutory testing and obscures the scheme's true impact.

Conclusion to Section 2: Policy Conflict and Irreversible Harm

This application inflicts demonstrable harm upon listed buildings and the Conservation Area, failing **Policies 10, 56, 58, 60, and 61**, and core **NPPF** tests. The scale and massing represent fundamental flaws that are irreconcilable with adopted policy and established planning frameworks. The proposal offends against all relevant planning documents—from the Joint Planning Brief of Bradwell's Court Redevelopment to the Historic Core Appraisal—which prioritise light, human scale, permeability, and local character. If approved, this scheme will undo the considerable achievements of the 2008 Christ's Lane redevelopment, which, as evidenced by English Heritage case studies, successfully restored connectivity, respected historic grain, and enhanced the public realm. Where policy demands openness and engagement, this proposal delivers only mass and shadow, resulting in irreversible harm.

3. Heritage Harm: Disruptive Scale, Massing, and Contextual Imbalance – A Policy Breach

The applicant's Heritage Statement is characterised by a significant evasion of critical issues, fundamentally failing to address the heritage harm precipitated by the proposed development's disruptive scale, massing, and contextual imbalance. This approach circumvents statutory and policy requirements, prioritising perceived benefits over the imperative to conserve heritage assets. This directly contravenes the National Planning Policy Framework (NPPF)'s directive to afford conservation "great weight." **The NPPF** is unequivocal on this matter: **Paragraphs 212–221** mandate that considerable weight be given to the conservation of heritage assets, and any resultant harm can only be justified if demonstrably outweighed by clear and convincing public benefits. In this instance, no such benefits have been substantiated. Consequently, the evidence of harm is overwhelming. Given the alignment of all heritage consultees in their assessment of this harm, the threshold of "great weight" stipulated by national policy renders refusal unavoidable.

3.1 Independent Confirmation of Heritage Harm

In addition to the consensus among all heritage consultees – Historic England, the Victorian Society, and the Conservation Officer – regarding the assessment of heritage harm, the independent report commissioned from heritage consultant Alec Forshaw corroborates this evaluation.

Alec Forshaw, an independent heritage consultant, confirms the extent of significant harm as follows:

- Less-than-substantial harm, at the upper end of the scale, to the setting of the Bodley Library.
- Less-than-substantial harm, at the middle range, to the setting of the north range of Bath Court.
- Less-than-substantial harm, at the lower to middle range, to the Central/Historic Core Conservation Area, encompassing the St Andrew's Street and Drummer Street/Christ's Lane sub-areas.
- Less-than-substantial harm, at the lower end of the scale, to historic fabric within the Grade I listed kitchen and Upper Hall areas.

This comprehensive assessment fundamentally indicts a development that undermines heritage assets of the highest significance. Furthermore, it is situated within an area where, per **NPPF Paragraph 212**, very high significance must be afforded to conservation.

3.2 Oversized, Over-Dominant Proposal – National Heritage Bodies' Assessment

The applicant's assertion that the proposal is "less ambitious than the earlier approved scheme" is demonstrably false. The current proposal exhibits greater height and bulk in proximity to the Bodley Library, concentrating harmful massing above ground level due to the removal of the basement. This results in an "over-dominant" presence that overwhelms Bath Court and poses a threat to surrounding Grade I listed buildings. Claims regarding the site's limited Christ's Lane frontage are disingenuous, as the proposed scale will be visible along the entire Lane and beyond.

Historic England's critique is unequivocal: the removal of the basement "results in increased massing above ground level and brings other instances of harm," thereby creating pressure on Bath Court's buildings. Their observation that the building "feels too big" and the "increased height towards Christ's Lane feels quite large" constitutes a damning indictment of the design's contextual inappropriateness. Revisions concerning chimney heights were dismissed as leaving the "overall massing of the building unchanged," confirming the persistence of fundamental problems and effectively demolishing claims of a less ambitious design. This

necessitates a substantial reduction in height, as the current massing is fundamentally inappropriate for the heritage context.

The Victorian Society's stark evaluation highlights a crucial distinction: whereas a previous scheme caused no demonstrable harm, this new proposal carries the distinct potential for heritage harm. Their suggestion to halve the building's height to align with the Bodley structure signifies a radical re-evaluation, exposing the excessive scale and massing of the current design.

3.3 Misrepresentation and Irrefutable Cumulative Harm

Regarding the Bodley Library, the applicant's claim of improved views due to being "slightly further away" is a misrepresentation. Forshaw's report directly addresses this, stating: "This completely overlooks the fact that, at present, the low level of the existing Grillet range allows extensive views of Bodley's turreted stair tower from Christ's Lane which will be either blocked or overwhelmed by the greatly increased height of the proposal."

Forshaw concludes that the cumulative harm reaches the middle range of less-than-substantial harm. This level of harm is not offset by the claimed minor heritage benefits, which are "more than outweighed by the overwhelming bulk of the proposed new building." Consequently, the proposal fails **NPPF Paragraph 215's** test, which requires that harm be weighed against public benefits.

3.4 Policy Conflict and Heritage Degradation

Cambridge Local Plan **Policy 61** (Heritage Assets and their Settings) mandates that proposals must sustain and enhance the significance of heritage assets. Rather than sustaining significance, the proposed form actively erodes it. The bulk and chimney stacks overpower Bath Court, First Court, the Bodley Library, and Upper Hall—each a Grade I listed building—resulting in overshadowing and a loss of the intimate historic scale that defines this setting. In place of enhancement, the scheme delivers visual dominance and discordance, representing the polar opposite of the policy's objectives.

The applicant's dismissal of earlier schemes is inaccurate. The current proposal's massing and scale contravene **NPPF Paragraph 205's** requirement to "respect and enhance the historic character of the area." Furthermore, **Section 72 of the Planning (Listed Buildings and Conservation Areas) Act 1990** mandates special attention to preserving or enhancing conservation areas. The proposal actively degrades the Central (Historic Core) Conservation Area's character and appearance, rendering any claims of "enhancement" hollow. The failure to adequately address harm to Grade I listed buildings (as required by **Section 66**) solidifies the policy conflict.

Conclusion to Section 3: Irreparable Heritage Harm

The proposed development inflicts significant heritage harm through its disruptive scale, massing, and contextual imbalance. It fails to comply with **NPPF** and **Planning Act** requirements, actively undermining a heritage asset of exceptionally high significance. Critiques from the Victorian Society and Historic England unequivocally confirm that the proposal is fundamentally at odds with heritage preservation principles. The scale and massing are intrinsic failings, irreconcilable with adopted policy. It offends the Joint Planning Brief, the Conservation Area Appraisal, and numerous Local Plan policies, all of which prioritise the preservation and enhancement of heritage. Against this cumulative policy conflict, the application fails all relevant tests.

4. Claimed “Public Benefits”: A Transparent Exercise in Inflation

The "public benefits" purportedly offered by the applicant fail to withstand even cursory examination. They are consistently overstated, frequently irrelevant, and in several instances, entirely fictitious as genuine planning gains. What is presented as a compensatory balance for substantial heritage harm is, in reality, a thin collection of conveniences—many of which either already exist or are so minor as to be negligible. The assertion that these gestures can offset the proposed level of harm is unserious and borders on misrepresentation.

The proposal fundamentally collapses under the weight of the very policy test it seeks to invoke. Under **NPPF (§202)** and **Local Plan Policy 59**, any harm to heritage assets must be demonstrably outweighed by a demonstrable, deliverable public benefit. In this case, no such benefit exists. The supposed benefits can be broadly categorised into three failing groups:

4.1 Trivial, Existing, and Mischaracterised Measures

- **Public Access – An Inherited Situation, Not a Gift:** The claim that existing public access constitutes a "new benefit" is indefensible. This arrangement is already in place and will persist irrespective of this scheme.
- **Tokenism in the Public Realm:** The provision of a single bench and a "book-stop" amounts to mere window dressing, not a substantive public benefit. These gestures offer no meaningful return for the significant harm proposed.
- **The Retreat from Greening:** The substitution of a previously promised green wall with a few planters represents not progress, but a retreat. This demonstrates a failure to meet earlier commitments and a lack of genuine ambition for the site.
- **Design Standards Masquerading as Benefit:** The use of "quality materials" is a fundamental duty, not a gift. Compliance with baseline design expectations within a conservation area is an obligatory standard, not a praiseworthy achievement.

4.2 Speculative Assertions and Questionable Delivery

- **Sustainability – Assertions Without Substance:** The claim of carbon reduction is unsupported by comparative data and directly contradicts the inherent material intensity of new construction. In the absence of evidence, this argument constitutes unsubstantiated greenwashing.
- **Economic Impact – The Net Position Is Negative:** Temporary construction employment cannot compensate for the extended disruption to local trade and amenity. The supposed economic boost evaporates entirely when the full costs are considered.
- **Accessibility – Internal, Not Public:** Improvements to student accessibility exclusively benefit the College. Conversely, accessibility for the wider public is diminished both during and after construction—a crucial point that is conveniently overlooked.
- **Urban Design and Safety – Misunderstood Principles:** The premise that upper-level glazing and diffused lighting enhance surveillance or safety betrays a fundamental misunderstanding of how people experience street-level environments. The proposed new façade eliminates sky and daylight at pedestrian level while projecting glare from above, creating an optical imbalance that casts the lane into gloom and shadow.
- **Reliability – History Repeats Itself:** The majority of claimed "enhancements" are contingent upon third-party agreements or post-approval conditions. The College's track record in such matters offers little reassurance. The much-publicised green wall approved in 2004 was never delivered, and the public art secured under the 2011 library consent similarly disappeared from subsequent proposals.

without explanation. Against this backdrop of unfulfilled commitments, any new promises regarding planting, art, or boundary improvements must be regarded with scepticism.

4.3 Self-Serving Institutional Gains

- **Private Benefit Disguised as Public Good:** The enhancement of internal library facilities serves the institution exclusively and alters nothing in the relationship between the College and the wider city. Presenting this as a civic benefit is a self-serving invention.
- **Architectural Interest as Diversion:** The assertion that "new architecture" inherently constitutes a public good is unconvincing. The heritage value of Christ's College resides in its historic fabric and spatial coherence, both of which are compromised by this scheme.

Conclusion to Section 4: Collapse In The Balance of Public Benefit

Taken collectively, the applicant's claimed benefits amount to little more than superficial window dressing—gestures masquerading as compensation for irreversible harm. The majority of proposed "gains" either pre-exist the proposal, could be delivered independently, or are too minor to register as significant advantages. **Policy 59** and **NPPF §202** explicitly require demonstrable, deliverable public benefit to outweigh heritage harm. In this instance, the purported benefits are neither proven nor credible. The proposal offers rhetoric in place of reality, and consequently, the balance falls decisively against approval.

5. Daylight, Sunlight, and Shading: A Fundamental Failure in Protecting Public Amenity

The daylight, sunlight, and shading reports submitted by the applicant, as critically reviewed by EB7, exhibit significant deficiencies. These oversights represent a fundamental failure to uphold policies designed to protect public amenity, thereby transforming the subject lane from a vibrant, well-lit pedestrian space into a gloomy, darkened corridor.

5.1 Deficient Assessment and Policy Disregard

The applicant disregards **Policy 56** and **Policy 60** of the Cambridge Local Plan, both of which mandate the provision of comfortable, well-lit spaces and the avoidance of overshadowing. National guidance, specifically **BRE Report 209 (2022)**, requires sunlight assessment for public areas such as this lane; however, the applicant has failed to provide any compliant analysis. The dismissal of the lane as a mere "transient passageway" ignores its current function as a space for café seating, art displays, and informal dwell areas, where the quality of light is crucial for user engagement. Consequently, failing to assess the impact on light is, in effect, a failure to assess the impact on public amenity.

5.2 Inadequacy of the '2+ Hour Sunlight Test'

The applicant's proposed '2+ hour sunlight test' is wholly inadequate. A single-date metric cannot accurately represent the prolonged afternoon shadowing that is evident even in the applicant's own studies, particularly at 6 pm on the summer solstice. This deficiency means the lane will be plunged into shadow precisely during its peak usage times, directly contravening **Policy 58's** prohibition of undue overshadowing. The public realm itself is the "neighbour" that is detrimentally affected.

5.3 Overshadowing, Enclosure, and Heritage Loss

The proposed doubling of the library's height and bulk will result in the elimination of southern sky views, leading to substantial enclosure and a significant loss of light. This outcome directly contradicts **Policy**

58 and, critically, **Policy 61 (Conservation Areas)**. The Historic Core Conservation Area Appraisal specifically highlights the lane's significance, attributing it to its particular balance of enclosure and light. The removal of light and sky views erodes its heritage value and diminishes its fundamental character.

5.4 BRE-Non-Compliant – Incomplete and Misleading Shading Studies

A comprehensive study of shading impacting the lane as a public space is required, as mandated by BRE requirements. This is particularly pertinent given the shading effects indicated in the 18 July shading images submitted by the applicants. The applicant's claim, which extrapolates a conclusion from partial studies to suggest that late afternoon sunlight would be maintained, is demonstrably false. Even the limited studies provided by the applicants themselves indicate impacts in the late afternoon. A full study would undoubtedly reveal the extended impact, especially during the earlier parts of the year. The BRE guide mandates a need for a full study as per:

3.3.12 For critical areas, particularly in public open spaces, it is suggested a more detailed study of sunlighting potential may be carried out....by shadow plotting.

The applicant's assessments are incomplete, non-compliant with BRE methodology, and misleading. Their conclusions of "negligible" or "acceptable" effects are irreconcilable with the provided data and the City Council's policy tests. The proposal fails to meet:

- **Policy 56:** to secure a comfortable, human-scaled environment.
- **Policy 58:** to avoid overshadowing and domination of the public realm.
- **Policy 60:** to protect amenity through adequate daylight and sunlight.
- **Policy 61:** to sustain or enhance the Conservation Area's character.

Development must preserve light, openness, and public usability; this proposal achieves the opposite.

Conclusion to Section 5: Conceptual and Environmental Failure

Christ's Lane is destined to become a dim tunnel of shade, a direct consequence of analytical shortcuts and a profound disregard for established policy. This represents a conceptual failure, striking at the very core of the lane's design and purpose. In terms of daylight and sunlight provision, this scheme fundamentally fails.

6. Economic Harm to Retailers on Christ's Lane

The presence of local retail along Christ's Lane is not merely incidental but is a deliberate and integral component of the lane's character, as established during the Bradwell's Court Redevelopment. This intention was explicitly stated in the Planning Officer's report from 2004: "The proposal is a distinctive mixed use design that relates well to its setting within the Conservation Area and adjacent to several Listed Buildings. Furthermore, it seeks to attractively re-open Christ's Lane as a main pedestrian link within the town centre. All of the publicly accessible frontages are active and the scheme adequately protects existing building lines whilst also seeks to improve the adjoining public realm. [...] There is a clear vision set out by the Brief to create an active and interesting shopping environment in this location that is pedestrian friendly. This is the overarching improvement associated with the proposal."

6.1 Breach of Local Policy Protecting Local Retailers

The development proposed by Christ's College stands to inflict direct economic harm on the retail businesses located on Christ's Lane, thereby reversing established precedents and contravening local policies designed

to protect local retailers. This assertion is supported by evidence provided by the applicant and is exacerbated by the lack of any management plan designed to mitigate the disruption. The anticipated impact is in breach of **NPPF §81** (aimed at supporting "strong and competitive town centres") and **Local Plan Policy 6/7** (which focuses on the protection of local centres and primary frontages).

6.2 Loss of Daylight and Sky – A Fatal Impact to Retail Amenity

According to the applicant's Daylight and Sunlight Study, over 25 retail windows will suffer reductions in Visual Comfort (VSC) exceeding 50%, with many failing to meet even the baseline BRE standards. For the cafés and restaurants situated along this frontage, daylight is not merely an aesthetic feature but a policy-supported amenity that is intrinsically linked to business viability and customer experience. **Policy 6/7** is explicitly designed to protect this frontage; thus, removing light and openness directly undermines those qualities of attractiveness and footfall that the policy was intended to safeguard, resulting in a conflict with both **Local Plan 6/7** and **NPPF §81**.

6.3 Construction Impact – Prolonged and Unmanaged Harm

The projected construction period, initially stated as two to three years but now claimed to be indefinite with no defined timeline, will severely and unacceptably impact retailers on Christ's Lane. This impact is exacerbated by the lack of safeguards and the absence of a pedestrian management plan. The proposed redevelopment threatens to turn Christ's Lane into a long-term construction corridor, dominated by scaffolding, welfare units, storage areas, and service vehicles passing through from Drummer Street Bus Station, thereby obstructing a key pedestrian link. The direct consequences will include suppressed footfall, blocked access, and the erosion of business continuity for the cafés, traders, and retail units that make up the protected Primary Shopping Frontage under **Local Plan Policy 6/7**.

In direct contravention of **Local Policy 6/7**, which is designed to protect Primary shopping frontages, the proposed development is engineered to degrade such a frontage. This contravention is compounded by broader policy breaches: the development undermines the vitality of a designated shopping centre (**NPPF §81**), fails to create healthy, inclusive, and safe places by narrowing and congesting the pedestrian environment (**NPPF §92**), and offers no provision for safe, accessible routes during construction (**Policy 80**). The combined effect constitutes structural harm to protected retail, rather than incidental disruption.

Conclusion to Section 6: Economic Harm to Retailers on Christ's Lane

The economic harm to retail is inherent and irremediable. VSC losses exceeding 50% cannot be restored, and years of unmanaged construction cannot be retroactively offset. Christ's Lane's role as a pedestrian-oriented retail corridor will be materially undermined, contrary to both local and national policy. Granting approval would equate to knowingly breaching the policy safeguards established for the city's retail centre.

7. Deficient Sustainability Rationale and Evidential Failure

The application submitted by Christ's College presents a clear instance of greenwashing, where arguments for an oversized and contextually inappropriate building, causing demonstrable harm to heritage and public amenity, are predicated on sustainability claims. These claims are cited as justification for the removal of a basement in the 2025 scheme compared to the 2016 proposal, and for the necessity of large, industrial-style chimneys in the new design. However, each of these sustainability arguments can be shown to be disingenuous and without adequate justification, failing due to selective interpretation, unsubstantiated

assertions, and a disregard for both national and local policy requirements. Each fundamental element of the sustainability case collapses under scrutiny, resulting in a proposal that is environmentally unproven, contextually detrimental, and non-compliant with policy. The inherent contradictions are profound, and the project fails to meet every evidential test stipulated by the **NPPF and Local Plan Policy 28**.

7.1 National and Local Policy Breaches

At the national level, **NPPF §157** mandates that low-carbon development must be properly evidenced and demonstrably sustainable. Similarly, the Cambridge Local Plan (**Policy 28**) requires measurable and verifiable sustainability performance. Both of these standards are contravened by the current proposal.

The decision to forgo a basement scheme, justified on the grounds of embodied carbon, represents a selectively framed argument. Concrete used below ground has effectively been replaced by concrete used above ground, as evidenced by the current semi-basement design. The overall massing of the building remains unchanged, and no comparative data has been provided to demonstrate any improvement in whole-life energy use. Generally, accommodation below ground performs better in terms of energy efficiency due to its natural thermal stability – a fundamental fact that has been omitted from the applicant's evidence.

7.2 Misrepresentation of Passive Ventilation Performance

The justification for the proposed chimney height relies on a misinterpretation of passive ventilation science. Ventilation efficacy is determined by the total chimney length, not its elevation above ground level. A ventilation shaft originating below ground will perform identically to one beginning at surface level. The exaggerated height of the proposed "chimneys" is therefore not a technical necessity but an aesthetic choice, introducing substantial visual harm to the historic skyline without any proven environmental benefit.

Expert evidence provided by the University of Cambridge's Director of Research in Industrial Sustainability confirms that such height is unnecessary. The building could be transposed downwards, maintaining identical passive ventilation capacity while significantly reducing its visual intrusion. Furthermore, lower ground temperatures offer additional natural ventilation potential, a point supported by the work of Aynsley (2014) and Laurini et al. (2018).

7.3 Ignoring the Full Definition of Sustainability

Sustainability, as defined, encompasses social and economic objectives alongside environmental performance. **Paragraph 8 of the NPPF** establishes these dimensions as indivisible. The creation of a high-quality public realm and the support of Christ's Lane's economic vitality are integral to sustainable development, yet both have been disregarded in this proposal.

The present scheme offers no contribution to social cohesion, accessibility, or civic life. It provides no improvement to the street environment and fails to protect the built and historic setting. By narrowing the definition of sustainability to a single technical parameter – energy performance – the College has fundamentally misapplied the policy framework it purports to invoke.

7.4 Design Consequences of a Narrow Approach

This selective interpretation of sustainability has resulted in direct and compounding design failures. The elimination of a full basement has inflated the building's height and massing, exacerbating its impact on the public realm and adjacent heritage assets. The chosen architectural idiom reinforces a separation between the College and the city, rather than promoting integration.

These are predictable outcomes stemming from a flawed sustainability approach, not mere side-effects. Feasible alternatives exist that could deliver identical environmental performance while achieving superior compliance with the **NPPF**, **Local Plan**, and accepted urban design principles.

Conclusion to Section 7: Deficient Sustainability Rationale and Evidential Failure

This situation represents not an interpretative difference but a systemic collapse of evidence. The scheme breaches **NPPF §157** and **Local Plan Policy 28**, misrepresents sustainable design principles, and disregards economic and social policy objectives. Its environmental claims are unsubstantiated, and its design outcomes are demonstrably harmful. The contradictions are absolute, rendering the proposal untenable.

8. Absence of Traffic Management and Pedestrian Safety Measures

Christ's Lane functions as the busiest pedestrian route in Cambridge — a critical public highway linking the retail core, Drummer Street Bus Station, and the historic heart of the city. Carrying over 10,000 pedestrians daily, it serves as a vital east–west artery supporting both civic accessibility and retail vitality. Any prolonged obstruction or restriction would have immediate and far-reaching impacts on thousands of users and the traders who depend on consistent pedestrian flow.

Given these conditions, a detailed pedestrian management plan is an indispensable prerequisite for any major construction proposal in such a constrained space. It must identify safe alternate routes, ensure accessibility for all users, and prevent conflicts between construction activity and public movement. The absence of such a plan in the submitted materials renders the proposal fundamentally undeliverable and contrary to established principles of public safety and procedural compliance.

8.1 National Policy and Statutory Breaches

At the national level, **NPPF §§110–112** require development proposals to facilitate safe and accessible movement, minimising conflict between pedestrians and vehicles. **NPPF §92** further mandates the creation of “healthy, inclusive, and safe places.” These duties have been disregarded.

- **Equality Act 2010:** The application ignores statutory obligations to provide equal access and reasonable protection for mobility-impaired users.
- **Cambridge Local Plan Policy 80:** Requires the safeguarding of safe, accessible routes both during and after construction. No such provision is made within the submitted documentation.

Together, these omissions constitute breaches of both statutory and policy frameworks designed to protect public movement, accessibility, and safety.

8.2 Statutory Consultee Objections – Unmet and Unenforceable

Multiple statutory consultees explicitly raised concerns which remain unaddressed.

- **Highways Authority:** Required a standalone, detailed Traffic Management Plan covering off-highway loading, contractor parking, delivery traffic, and mitigation of dust and debris. Instead, Christ's College substituted a single cursory paragraph within its Construction Environmental Management Plan, leaving all highway requirements both unmet and unenforceable.
- **Waste Authority:** Specifies access standards for a 32-tonne collection vehicle, a maximum 12-metre reverse, a 10-metre bin transfer distance, and full step-free access. Within the narrow, high-footfall confines of Christ's Lane, these conditions are physically impossible without obstructing pedestrian movement or compromising safety. More critically, compliance with Waste Authority standards

directly conflicts with Highways Authority restrictions. The two sets of requirements are mutually irreconcilable, and therefore the scheme cannot be conditioned into compliance.

8.3 Contravention of Precedent and Civic Importance

Beyond these statutory failures, the proposal contradicts established planning precedent. The **2004 Officer's Report** on the Bradwell's Court redevelopment made clear that Christ's Lane must remain open unless no feasible alternative existed — and only then if a safe, equally convenient diversion were provided. The current scheme meets neither criterion.

Christ's College has already appropriated approximately two metres of Christ's Lane for private parking, reducing the guaranteed six-metre pedestrian width to four. This physical narrowing embeds permanent congestion within a route of recognised civic importance, undermining public accessibility and the integrity of the city's pedestrian network.

8.4 Dismissal of Democratic Oversight

Democratic oversight has been similarly disregarded. During the **Development Control Forum (DCF)**, the Market Ward Councillor warned that construction impacts could not be deferred or treated as peripheral issues. He specifically requested that a detailed Construction Management Plan accompany the main application to safeguard public access and business continuity. Christ's College did not respond to that recommendation, either through subsequent documentation or correspondence — completing a pattern of evasion extending from statutory compliance through democratic accountability.

Conclusion to Section 8: Absence of Traffic Management and Pedestrian Safety Measures

This is not a minor procedural omission but a systemic collapse of compliance and accountability. The project breaches **NPPF §§92, 110–112**, the **Equality Act 2010**, and **Cambridge Local Plan Policy 80**; defies the explicit requirements of the Highways and Waste Authorities; contradicts established precedent; and ignores democratic oversight. The contradictions are fundamental, and the proposal, lacking any practicable traffic or pedestrian management framework, is **inherently undeliverable**.

9. Exploring Alternative Approaches to Preserve Heritage and Public Amenity

The current redevelopment proposal by Christ's College presents significant concerns regarding its impact on the public realm and heritage setting, primarily attributable to the excessive above-ground bulk and massing of the proposed building. Fortunately, viable alternatives exist that demonstrate how the necessary development objectives can be achieved without inflicting such harm. These alternatives focus on reducing the scale of the structure to achieve better integration with its sensitive conservation area location.

9.1 The 2016 Rick Mather Architects Scheme: A Precedent for Contextual Sensitivity

One such alternative is the **2016 scheme developed by Rick Mather Architects** for Christ's College, which previously received planning consent. This proposal is highlighted as an appropriate and deliverable form of redevelopment, offering a balanced and contextually sensitive approach. It serves as a crucial benchmark, demonstrating that a project of this nature can be realised without compromising the character of the surrounding historic environment.

9.2 The Create Streets Proposal: Enhancing Public Realm and Human Scale

Building upon this foundation, a more recent alternative design has been prepared by **Create Streets, led by Nicholas Boys-Smith**. This proposal convincingly illustrates that a building with similar functional capacity can be delivered while simultaneously creating a more engaging and human-scaled frontage along Christ's Lane. The Create Streets approach advocates for a more traditional architectural idiom, which not only better reinforces the qualities of the surrounding historic environment but also delivers genuine sustainability across all dimensions.

9.3 Key Features of Alternative Designs

The key features of these alternative designs directly address the shortcomings of the current proposal:

- **Reduced Height and Massing:** By strategically incorporating basement levels, the overall above-ground height of the building is significantly reduced. The proposed ridgeline, for instance, can be aligned with that of the Bodley Library, diminishing the imposing verticality of the current plans by approximately five meters. This reduction in bulk, facilitated by the basement, effectively prevents the oppressive, canyon-like effect that the current proposal would create.
- **Harmonious Scale with Heritage Assets:** The scale of these alternative designs is carefully considered to align with neighbouring, modestly proportioned Grade I listed buildings. This ensures that the new structure enhances, rather than detracts from, the delicate heritage setting. Facade treatments, such as rhythmic gables and symmetrical window arrangements that echo the proportions of the Bodley Library, contribute to this contextual harmony.
- **Enhanced Public Realm and Active Frontages:** In contrast to the fortress-like appearance of the current proposal, the alternative designs prioritise an active ground floor. This is achieved by incorporating windows at ground level that create a visual connection and permeability between Christ's Lane and the interior of the building. The introduction of border planting and public seating along the lane offers respite and transforms a previously hardscaped area into a more welcoming and pedestrian-friendly environment, thereby fostering the "active and interesting environment" that planners advocated for at the time of the Bradwell's Court development.

Conclusion to Section 9: Demonstrating Viable and Contextually Sensitive Alternatives

These alternative proposals are not presented as rigid, definitive solutions but rather as compelling demonstrations of how a new library on the site can be a superior fit for Christ's Lane. They showcase a design that is both attractive and in harmony with its context, respecting the unique character of this historic conservation area while retaining the essential functions sought by the College. They provide a clear pathway towards achieving development without compromising heritage values or public amenity.

10. Conclusion

This submission demonstrates that the **Christ's College redevelopment proposal** fails to meet the statutory and policy requirements governing sustainable development, heritage conservation, and procedural integrity. Its advancement under the **Planning Performance Agreement (PPA)** framework has produced material procedural irregularities, depriving both decision-makers and the public of the transparency, technical assurance, and participatory engagement required by the planning system.

The proposal stands in direct and demonstrable conflict with the **National Planning Policy Framework (NPPF)** — paragraphs §§16, 35, 39, 92, 110–112, 157, 194 and 202 — and with the **Cambridge Local Plan**, including **Policies 10, 28, 56, 58, 60, 61, and 80**. These conflicts are substantive and cannot be remedied by minor amendment. Specifically, the scheme fails in the following respects:

- **Heritage Assessment and Mitigation:** Neglects to assess or mitigate harm to designated heritage assets, including the Central (Historic Core) Conservation Area and the settings of the Bodley Library and adjacent listed buildings, in breach of **Policies 60 and 61** and **NPPF §194**.
- **Daylight, Sunlight, and Overshadowing:** Omits adequate analysis contrary to **Local Plan Policy 58** and established **BRE 209 (2022)** guidance, resulting in an unacceptable loss of amenity in the public realm.
- **Sustainability Justification:** Provides a deficient and selectively evidenced rationale for sustainability, violating **Policy 28** and **NPPF §157**, and failing to address the required social and economic dimensions of sustainable development as set out in **NPPF §8**.
- **Traffic and Pedestrian Management:** Lacks a compliant Traffic and Pedestrian Management Plan, contrary to **Policies 80** and **NPPF §§110–112**, and is therefore inconsistent with the accessibility duties mandated under the **Equality Act 2010**.
- **Procedural and Consultation Standards:** Demonstrates non-compliance with the **Statement of Community Involvement (SCI)**, **NPPF §39**, and local validation requirements, rendering its consultation process and evidence base unsound.

Assertions of overriding public benefit are unsubstantiated and fail to satisfy the evidential threshold required to outweigh the magnitude of policy conflict and heritage harm identified by independent experts, statutory consultees, and community bodies. The PPA process, by insulating the applicant from normal technical and public scrutiny, constitutes a systemic governance failure inconsistent with the principles of openness, accountability, and procedural fairness enshrined within the NPPF.

Accordingly, it is submitted that the application cannot lawfully or reasonably be approved in its present form. The Council is respectfully invited to:

1. **Refuse planning permission** on the grounds of fundamental conflict with national and local planning policy, failure to protect heritage significance, and procedural and statutory non-compliance; and
2. **Commission an independent audit** of the PPA process, ensuring that future use of such agreements restores public confidence and strengthens adherence to the regulatory framework.

It is further noted that deliverable and policy-compliant alternatives exist. The 2016 consented scheme by *Rick Mather Architects* and the Create Streets proposal led by *Nicholas Boys-Smith* each demonstrate that redevelopment of equivalent functional capacity can be achieved while preserving the established scale, character, and amenity of Christ's Lane. These precedents confirm that a lawful, well-designed, and sustainable scheme is entirely attainable without the harm identified in the present application.

For the reasons set out above, it is therefore respectfully requested that the Council refuse the application and require a revised proposal consistent with the adopted development plan and with the principles of proportionate, transparent, and sustainable urban design.