

**AN INDEPENDENT APPRAISAL OF HERITAGE
STATEMENT AND ASSESSMENT OF HERITAGE IMPACTS
CHRIST'S COLLEGE CAMBRIDGE**

PLANNING APPLICATION REF: 26/02109/FUL

**ADDENDUM TO HERITAGE APPRAISAL FOR PLANNING
AND LISTED BUILDING CONSENT APPLICATIONS REF:
25/02161/FUL & 25/02162/LBC**

BACKGROUND

This report has been prepared in response to the re-submission by Christ's College of proposals to demolish and replace the library on Christ's Lane. This follows the quashing on 28th April 2026 of the planning permission granted by Cambridge City Council in November 2025 for the same scheme, in the wake of a Judicial Review. The JR, launched by the Christ's Lane Action Group (CLAG), challenged the November 2025 consent on four grounds, all of which were described as 'strongly arguable' by Justice Kimblin. These grounds were:

- a) Historic England's advice was materially misrepresented
- b) The planning officer's report gave members an inconsistent heritage balance
- c) 'Optimum viable use' was wrongly used as a public benefit
- d) Less harmful alternatives were not properly considered

The applicant resubmitted identical physical proposals for planning permission on 5th June. Cambridge City Council have not notified previous statutory or non-statutory consultees or those who made comments on the previous applications. The closing date for submissions is 9th July 2026.

COMMENTS ON NEW APPLICATION 26/02109/FUL

The scheme has not been altered physically in any way; the proposals are identical to 25/02161/FUL. However, the applicant has submitted a new covering statement for the new application prepared by its consultants, Turley. Rather than addressing any of the points raised in the JR, the statement seeks to remake an argument that the scheme causes no heritage harm, and that the

heritage impacts are only neutral or beneficial. Paragraph 3.16 implies that there is no need to engage with paragraphs 214 or 215 of NPPF and no need to undertake any form of planning balance. I strongly refute this argument.

The suggestion in paragraph 3.8 of the statement that objectors have focussed too much on one view of the proposal, opposite Christ's Lane from St Andrew's Street, is incorrect. There is a continuum of kinetic views of the proposal, not only from Christ's Lane itself approached in both directions, but also from a considerable length of St Andrew's Street to the south. This was clearly set out in my Heritage Assessment (see paragraphs 12-24 below).

The statement's claim in paragraph 3.11 that views of the Bodley Library will not be impeded or adversely impacted are incorrect. Visibility of the staircase turret will be eroded because of the height of the proposal. The existing clear silhouette of the gable will be impacted. The first photograph in Appendix 1 of Turley's statement shows exactly how subservient is the scale of the existing 1970s building to the staircase turret of the Bodley Library.

In paragraph 3.12 the statement seeks to downplay the concerns of the Conservation Officer about the visibility of the chimneys from pedestrian eye level in First Court by drawing attention to what might be visible from upper floor windows within the college. Such views from private accommodation are not normally considered relevant and do not override the Conservation Officer's concerns about ground-level views.

Another point raised in the new statement is that the delay in achieving planning permission is causing harm to the operations and ambitions of the applicant as an educational institution. Given that there have been previous consents in 2011 and 2016 to build a new library which the applicant has chosen not to implement this argument is hard to justify. Furthermore, had the applicant taken on board the expert heritage advice of Historic England and the Victorian Society in 2025, then an amended scheme might not have been so vigorously opposed by objectors and might now be further advanced towards construction.

NEW SUBMISSIONS BY OTHER HERITAGE BODIES

Historic England has written to confirm that its two previous letters concerning the 2025 application still stand. The Victorian Society's comments on the new application, submitted on 6th July 2026, reaffirm its previous objections and comments, its previous assessment that the proposals do cause harm to heritage

assets, and it urges the Council to reconsider the modifications that the Society's committee suggested in the advice it gave in August 2025. The Gardens Trust has submitted comments stating that the proposals are neutral in terms of the impact on the Registered Garden. They do not allocate any heritage benefits to the scheme.

In addition, a new submission has been made by Cambridge, Past Present and Future, which is Cambridge's largest civic society. Having only raised targeted layout and design queries on the 2025 application, it is now registering strong formal objections to the re-submitted 2026 scheme and asking the Council to negotiate a lower and less bulky design.

CONCLUSION

My Heritage Appraisal on the previous application, dated October 2025, is attached in full below. The points raised in that Appraisal continue to apply to the current application.

Alec Forshaw July 2026

HERITAGE APPRAISAL FOR PLANNING AND LISTED BUILDING CONSENT APPLICATIONS REF: 25/02161/FUL & 25/02162/LBC

BACKGROUND

1. This report has been prepared by Alec Forshaw on behalf of the Christ's Lane Action Group in response to the planning and listed building consent applications submitted in June 2025, Reference Nos. 25/02161/FUL and 25/02162/LBC. Revised drawings were submitted on 28th August 2025. The report has been finalised after the presentations and discussion at the Development Control Forum held on 11th September 2025. It responds to the submission by Turley on behalf of the applicant, dated 26th September 2025, and to Greater Cambridge Shared Planning (GCSP) Conservation Consultation Response dated 18th September 2025.

PROPOSALS

2. Demolition of 1970s library and replacement with new library and social and study spaces and including re-provision of bridge to the Bodley Library. Alterations to kitchens, Upper Hall and adjacent areas including new plant, access improvements and alterations to WC provision in the SE range of Second Court. Re-landscaping of Bath Court and ancillary works. Installation of temporary kitchen and dining facility in Second Court for the duration of the works.

ASSESSMENT OF HERITAGE SIGNIFICANCE

3. The heritage assets affected by the proposals and their significance are set out in the applicant's Heritage Statement (HS). The site lies within the Central/Historic Core of Cambridge and there is no dispute that the complex of Grade I listed buildings, Grade II Registered Park and Garden and the Central Cambridge Conservation Area are designated heritage assets of very high significance. Paragraph 212 of the National Planning Policy Framework (NPPF) 2024 requires, when considering the impact of proposed development on the significance of a designated heritage asset, that great weight should be given to the asset's conservation. The more important the asset, the greater the weight should be, irrespective of whether any potential harm amounts to substantial harm, total loss or less than substantial harm to its significance. The HS references the Cambridge Historic Core Appraisal Street Analysis for St Andrew's Street (noted as 'High Significance'), but not that for Drummer Street and Christ's Lane (noted as 'Significant'). The latter notes the impending development of the Library, but also identifies 'key positive views' in both directions along Christ's Lane. The significance of the approach from Drummer Street has not been adequately addressed by the applicant.

SCALE OF PROPOSED DEVELOPMENT

4. Planning and listed building consent were granted in 2012 and again in 2016 for the demolition and replacement of the existing 1970s library, to designs by the celebrated architect, Rick Mather. This scheme has not

been implemented. The current proposal, both as submitted in June 2025 and as revised in August 2025, is substantially larger above ground level than both the existing building and the previously consented scheme. The suggestion by the applicant that the current proposal is ‘less ambitious than the earlier approved scheme, by omitting the basement and Bath Court roof’ clearly overlooks the greater scale and massing of the current proposal above ground, and its much wider impact. Careful comparison of the 2016 consent and the 2025 application shows that the new proposal involve greater height and bulk close to the Bodley Library.

5. Historic England’s (HE) formal written response to the application, dated 29th July 2025, notes that the removal of the basement from the previous scheme results in increased massing above ground level and ‘brings other instances of harm, as it puts considerable pressure on the surrounding buildings forming Bath Court. The building feels too big, over-dominant on this space, particularly in its relationship with the south range of First Court and the Bodley Library. Similarly, the increased height towards Christ’s Lane feels quite large when seen alongside the relatively modest elevations of the college.’ I agree with this judgement except I would say ‘too large’ rather than ‘quite large’.
6. The amended drawings submitted in August 2025 reduce the height of the proposed chimneys by 900 mm but do nothing to alter the overall massing or scale of the scheme. HE’s subsequent response dated 1st September 2025 notes that ‘the overall massing of the building remains unchanged’, and by inference its previous comments still apply. Whilst not making a formal objection, HE remains critical of the scheme.
7. The GCSP Conservation Consultation Response dated 18th September continues to state that the proposals cause a degree of harm.
8. In terms of the overall layout of the college the site occupies a secondary space, historically a garden, subsequently occupied by subservient service buildings, and since 1976 by a modest two storey structure with a solid masonry southern elevation to Christ’s Lane and a largely glazed northern elevation to Bath Court. While the technical and operational deficiencies of the existing building are not disputed, it should be noted that its designer, Christophe Grillet (1925-2012), was an experienced local Cambridge architect of some distinction, and partner of Lyster, Grillet and Harding Architects. The scale of his 1970s design was modest, respecting the established domestic scale of the 16th century buildings

between First Court and Bath Court as well as the late-19th century Bodley Library on the corner of St Andrew's Street and Christ's Lane. He was perhaps aware of Nikolaus Pevsner's 1954 critique of Bodley's approach in terms of its contribution to the St Andrew Street frontage, described as 'a job done exemplarily tactfully'. This 'exemplary tact' was reiterated by Simon Bradley in *The Buildings of England: Cambridgeshire* 2014. Bradley describes the existing Grillet's extension to the library as no more than a 'long curtain-walled front' with a glazed bridge linking with the Bodley Library.

9. The Drummer Street and Christ's Lane Historic Core Appraisal describe the Christ's College frontage to Christ's Lane as 'long and inactive' whilst forming part of 'key positive views' in both directions along the Lane. In my opinion I consider that the existing building makes a neutral contribution to the character and appearance of the adjacent heritage assets. The modest height of the existing library allows extensive sky views and provides a neutral transition between the Bodley Library and the Second Court range. The suggestion that it makes a negative contribution is strongly refuted. The College's increasing use of the two-metre wide strip of land it owns alongside the building as a parking lot for its own vehicles does little to help the local environment of Christ's Lane.
10. While Mather's 2016 proposals were somewhat larger than Grillet's 1974 building, they were modelled in order to maintain and defer to the established grain and hierarchy of college buildings. The current proposal is a radical departure from both Grillet's and Mather's designs and introduces a scale of development that is out of keeping with its context, and which as a result causes harm to the significance of designated heritage assets. The proposals are a damaging overdevelopment of the site.
11. In terms of 'transitioning between the scale of the Bodley Library and surrounding buildings', as claimed in Paragraph 6.9 of the applicant's HS, the proposal exceeds all its neighbours, including the 1913 building, the South Range of Second Court and the parapet height of the modern Bradwell Court on the opposite side of Christ's Lane. Far from being a transition, the proposal inserts a new building of conspicuously greater scale on the boundary of the college, exceeded only in height and mass by the 1968 New Court building on King Street (see paragraph 29 below), a considerable distance from the application site. The claim in paragraph 14

of the Turley submission dated 26th September 2025 that, because the site occupies less than half the length of Christ's Lane, the new building does not involve a major change in scale is clearly not the case given that it will be visible in oblique views for the entire length of the Lane and beyond.

IMPACT ON THE SETTING OF THE BODLEY LIBRARY

12. The Bodley Library, designed by George Frederick Bodley (1827-1907) and built 1895-97, completes the western side of First Court and the frontage to St Andrew's Street, turning the corner with Christ's Lane. The perfectly proportioned southern gable end, with its exquisite oriel window, delicate finial and asymmetric crenelated octagonal staircase turret, is a prominent feature of the corner, visible in a long continuum of views when approached from the south along St Andrew's Street. The views are greatest from the western pavement of St Andrew's Street, although the recent Bradwell Court development on the east side is deliberately stepped back to afford long views. Paragraph 4.17 of the applicant's HS notes, correctly, that 'due to the set back of the new development to the south on the site of Bradwell's Court, the south elevation has great prominence in long views along St Andrew's Street'. Described in the HS as a 'kinetic' view, the two images (Views B and C) provided in the applicant's Townscape and Visual Appraisal (TVA) do not adequately cover the extent or quality of the view.
13. The silhouette of the gable end and associated architectural features of the Bodley Library are currently visible against clear sky, and this is a very important part of its setting. This will be radically changed by the scale of the proposed development, intruding into the existing sky views. While the chimneys (discussed below) are the highest and dominating element of the proposal on Christ's Lane the most jarring impact on the setting of the Bodley Library is the western end of the upper floors of the proposal whose orthogonal geometry conflicts starkly with the sloping gable end and the splayed and crenelated staircase turret of Bodley's Library.
14. The Urban Design Response, dated 25th June 2025, and the Conservation Response, dated 22nd July 2025, from GCSP suggest that the application scheme has been improved from previous iterations of the proposals in

terms of the impact on the Bodley Library. The Conservation Response notes that ‘the stair tower in particular is large in relation to the adjacent Bodley Library and St Andrew’s Street frontage which is of two storeys with a largely domestic scale’. It suggests that, at the third-floor level, the impact has been mitigated by the set back from Christ’s Lane and ‘through the lightness of its design and materiality’. In my opinion this adverse impact has not been mitigated.

15. While the third floor at this point has been marginally pulled back from the Christ’s Lane frontage, as described on page 30 of the applicant’s Design and Access Statement (DAS), this does nothing to reduce the harmful impact on the setting of the gable when viewed from St Andrew’s Street, as is very clearly shown on page 31 of the DAS. The harmful encroachment of the third floor into the sky component of the setting of the Bodley Library has not been reduced. Moreover, the elevational treatment and materials of the staircase do nothing to reduce its bulk.
16. This matter is re-addressed in the Conservation Response dated 18th September which states that ‘the building is large in relation to its plot, with the change in scale between the proposed stair tower and the southern end of the Bodley Library being particularly striking. This is considered to result in a degree of harm. The shorter chimneys emphasise the stairs’ relative size in some local views as there is no longer the sense of stepping up in height.’
17. If it was the opinion of the Conservation Response of GSCP that the chimneys (at their original height) would have caused harm to the setting of the Grade I listed buildings of First Court then surely the impact of the scheme on the Grade I Bodley Library viewed from the public realm of St Andrew’s Street is far greater. I disagree with the conclusion in the Response date 18th September that the scale of the stair tower is ‘acceptable’.
18. In my opinion, the revisions to the chimneys submitted by the applicant in August 2025 make no difference to the adverse impact on the setting of the Bodley Library. The height has been marginally reduced but their width has not been and they remain bulky features. This is clearly shown in the comparative images included on page 5 of the applicant’s Planning Updates document, where the impact of the bulk of the upper floors of the new building against the Bodley Library gable is unchanged. If anything, the new slit openings in the chimneys make them more eye-catching.

19. A more fundamental question might ask why a second staircase is needed at all to service the top floor, where there is only a small amount of accommodation for students and larger areas of void and plant, or indeed why the third floor is required. The applicant should at the very least be asked to look at reducing the bulk and massing on the proposed top floor so that the impact on the setting of the gable is reduced.
20. The Urban Design response states, wrongly, that the cornice line that exists on the gable façade of the Bodley Library has been carried through onto the new building. The proposed elevation drawing no, 004700/P01 clearly shows that the new parapet or cornice line of the proposed second floor is much higher than the Bodley Library gable parapet, higher indeed than the staircase turret that it adjoins.
21. HE's response sets out this concern, and notes that the wall level which at present aligns with Bodley's stringcourse has now been lifted to turret level. 'It feels more overbearing in its relationship with the Bodley (Library) and evidences the difficulties to accommodate a building which is too large for what is a very domestic setting'.
22. The Victorian Society Southern Buildings Committee on 22nd August 2025 considered the revised proposals. The Society (which is a statutory consultee) is critical of 'the dominant scale in comparison to the Bodley Library' and makes various suggestions as to reducing the massing of the proposals to lessen the harmful impact. It states that, at present, the proposal 'appears to lack the human scale evocative both in the Bodley Library and the C15 First Court'. The Society clearly consider that the revised proposals are potentially harmful to the setting of the Bodley Library in a way in which the 2016 scheme was not. The comments suggest making a more fundamental reduction in height; 'For example. It would not be unreasonable for the scale of the proposed to take its lead from the floor heights of the Bodley (Library), opting to align the floors with the oriel window of the Bodley structure, thus reducing the height by approximately half at each floor'. This would substantially lower the overall bulk of the proposal. The suggestion in paragraph 2 of Turley's submission of 26th September that the Victorian Society are 'content with the current proposals' is not palpably correct, given that the Society consider the current proposals to be potentially harmful. While their carefully considered and helpful comments about improving the proposals to reduce the harm do not comprise a formal objection, the

Victorian Society is clearly not happy with the amended scheme in terms of its impact on Bodley's masterpiece. Paragraph 41 of Turley's submission suggests that the Victorian Society's comments should have compared the current proposals to previous schemes is also inaccurate. The Society did consider the previous proposals, but having focussed on the current application and its revisions it concluded that whereas the 2016 scheme did not cause harm, the current scheme potentially does cause harm. Turley's suggestion in paragraph 52 that the Victorian Society have concluded that 'overall the harms and benefits in heritage terms are at least balanced, or the benefits outweigh the harms' is not correct.

23. The description of the south elevation of the Bodley Library in the applicant's HS (paragraph 4.17) fails to mention the staircase turret, nor does the applicant's visualisation of View C accurately represent the octagonal and crenelated form of Bodley's staircase turret. The difference in terms of impact between the 2016 Mather scheme and the current proposal is clearly apparent on pages 24 and 25 of the TVA.
24. Paragraph 5.6 of the applicant's HS claims, wrongly, that because the proposed new building is slightly further away (about one metre) from the existing Bodley Library it will open up views towards more of the south-eastern corner of the Bodley Library and permit greater awareness of the turreted stair tower when approaching from Christ's Pieces. 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. The new link at first floor between the proposal and the Bodley Library will continue to block views further back of the east elevation of the Bodley Library.

IMPACT OF THE PROPOSED CHIMNEYS

25. The inclusion of tall chimneys on the southern face of the proposal has been a controversial and much debated feature of the proposals during pre-application discussions and at the DCF. The continuing concern following the application in June led to revised proposals being submitted in August 2025, reducing the height of the chimneys by 900 mm and

introducing slit vents in their sides. Even with these amendments I consider that they remain an important and sensitive issue.

26. Reference is made in the applicant's HS to the precedence elsewhere within the Historic Core of Cambridge of chimneys fronting onto historic streets. However, in terms of design and impact, the proposed chimneys on Christ's Lane are bulky and monolithic structures, rather industrial in character, and very different to the slender and finely articulated domestic character of the historic chimneys cited by the applicant as examples in Silver Street, Trinity Lane, and Pembroke Street. These medieval/Tudor chimney stacks were built historically to provide flues to fireplaces in college accommodation whose rooms and windows faced primarily into internal courtyards. As the Conservation Response of GCSP dated 22nd July noted 'the historic examples cited have a more articulated design, with a base, middle and top that tapers to an elegant upper section or pot'. Moreover, the apparent widths of Silver and Pembroke Streets (if not Trinity Lane) are much wider than Christ's Lane and comprise a street scene where the chimneys form much less dominant features. The applicant's Short Section CC drawing ref. 003702/P01 shows the width of Christ's Lane, building to building, as about 6 metres, far narrower than Silver Street or Pembroke Street.
27. HE's letter of 29th July also noted that the chimneys of Queens' College 'are proportionate to the college itself and still remain subservient to the imposing corner and gatehouse turrets; a similar relationship exists in St John's College. Christ's College's proportions are more modest than these later colleges'. In my opinion, the proposed chimneys for Christ's Lane, even reduced by 900 mm, will not be modest or subservient features in their context.
28. The Urban Design Response from GCSP suggested that the rhythm of chimneys will provide 'a subtly iconic presence to the lane, whilst leaning on legitimate historic precedent'. In my opinion, the impact will be dominant and far from subtle. The proposed chimneys on Christ's Lane, viewed obliquely from both directions, will coalesce to form an overpowering mass of masonry, rising 14 metres sheer from pavement level, which will overwhelm the townscape, quite unlike the more spindly and refined precedents elsewhere in central Cambridge. One of the proposed chimneys houses a lift shaft. The introduction of vents in the sides has done nothing to reduce their width.

29. The Conservation Response from GCSP set out its continuing concern about the height and bulk of the chimneys, particularly their adverse impact on First Court (see below), but also stating that ‘too much emphasis is being placed on the proportions of the Christ’s Lane elevation, which would only be experienced in oblique or close views due to the narrowness of the Lane. A lower height...continues to be the preferred option in conservation terms’.
30. In the overall context of Christ’s College, the proposed chimneys, even as reduced, will be as tall as the Gatehouse towers, and almost as high as the landmark cupola of the Hall, creating a presence within the overall architecture of the college and its hierarchy of buildings and spaces that is grossly disproportionate. HE notes that the rear turrets of the Gatehouse may even have been reduced in the 19th century, which makes their current height even more vulnerable to visual competition.
31. Although the applicant has slightly reduced the height of the chimneys their continuing prominence remains a wilful element in the applicant’s design. Notwithstanding the desire for passive ventilation, this approach appears fundamentally misguided on what is already too big a building for its site and location. Alternative methods of non-automated ventilation could be explored such as more openable windows, air intake grills and other forms of roof vents.
32. While not as extreme as the Christ’s College New Court Building (1968) where the scheme was designed by Denis Lasdun to face inwards into the college and offered (before later mitigation) an uncompromising Brutalist elevation to the public realm of King Street, the current proposals follow a similar approach, turning its back on the ‘town’. In *The Buildings of England: Cambridgeshire*, Simon Bradley commented about New Court, that ‘such constructions rarely make good neighbours; the arrogant intrusion on low-rise King Street was especially resented’ (by townfolk). In a similar fashion, the proposed development on Christ’s Lane sits uneasily with the low-rise historic buildings and boundary walls that enclose the rest of the college and against the modest scale of Bradwell Court that fronts the south side of Christ’s Lane.
33. The applicant’s HS states in paragraph 5.12 that the overall height of the stacks is slightly lower than the overall height of the adjacent Bradwell’s Court building. This point was repeated at the DCF but it overlooks the fact that the upper storeys of Bradwell Court were very deliberately set a

long way back from the street frontages of both St Andrew's Street and Christ's Lane. The parapet height of Bradwell's Court wherever one measures it above pavement level on Christ's Lane, is some 3 metres less than the height of the proposed chimney flues. In terms of the context of Christ's Lane the maximum height of Bradwell Court is irrelevant because it cannot be seen. The applicant's sectional drawings CC and DD show the proposed chimneys, which rise sheer onto Christ's Lane, with the faintest line, while heavily emphasising the massing of Bradwell's Court.

34. The suggestion in the HS that the views of the chimneys will become 'less visible or not visible as you move along Christ's Lane' is palpably incorrect. They will be highly visible for its entire length in both directions and will appear obliquely as a continuous mass of masonry. The proposal will be noticeably higher than any other of the buildings fronting Christ's Lane. The obvious fact that the new building does not occupy the whole of the north side of Christ's Lane does not diminish the visibility of the chimneys to pedestrians approaching from both St Andrew's Street and Drummer Street.

IMPACT ON FIRST COURT

35. In the initial submission the proposed chimneys would have been visible above the currently unbroken roof line of the south side of First Court when viewed from the north side of the Court. The applicant's HS states that several other courts in Cambridge colleges have distant buildings or structures that are visible beyond the roofs of buildings that enclose the court. While this may be the case, there are also many others that do not. The visually contained and sequestered nature of the typology of the college court is an important and intrinsic part of its significance, defining an environment that is separate, secluded and sheltered from the outside world. Whatever the historic precedent at First Court, pointed to by the applicant's HS, the current situation is that nothing is visible above the existing roof tops looking south from the north side of First Court. The 2016 Rick Mather scheme was modelled to retain the existing skyline, and Bradwell Court equally so beyond that.
36. The scheme has now been modified by reducing the height of the chimneys by 900 mm with the intention that they will not be visible, or

barely visible, from First Court. It was considered that the extrusion of the proposed chimneys above the roof line would have reduced the sense of seclusion of First Court causing harm to its significance as a heritage asset. The chimneys would also have challenged the height and prominence of the cupola of the Hall on the east side of the court.

37. The applicant's HS points out in paragraph 5.13 that the mobile phone mast behind the buildings on the west side of St Andrew's Street is a jarring existing presence, but this is surely an ephemeral object which can and will be removed; it should not be compared with the two hundred years that the proposal is intended to last.
38. The advice stated repeatedly by the local authority conservation officer that the chimneys should be shortened so as not to be visible is strongly supported. To quote from the Conservation Response: 'the height of the chimneys is considered excessive and unjustified and cannot be supported due to the harm it would cause to the setting of the grade I listed building when viewed from First Court'. While the Conservation Response and the comments of HE about the impact on First Court may have been covered by the revised chimney height, I retain concerns about their prominence on Christ's Lane.

IMPACT ON BATH COURT

39. While the existing building, proposed for demolition, is of little architectural merit, its height and light-weight materials facing north onto Bath Court respect the scale of the rear elevation of the south side of First Court, which is just two storeys plus attic. The mass and form of the proposal is radically different and will have an adverse impact on the setting of these Grade I listed buildings. The height and cantilevered design will loom over Bath Court, cutting out much of the existing daylight and sunlight currently enjoyed by the south-facing rooms, and will have an over-bearing impact on the character and appearance of Bath Court. This is clearly shown by comparing the existing and proposed cross-sections (drawing nos. 003502/P01 and 003702/P01). The second-floor slab of the proposal is less than 3 metres from the front face of the

north side of Bath Court, with the projecting roof eaves coming even closer. While the ground and first floor are recessed, the maximum width of Bath Court in the proposed scheme is no more than 5 metres. The visualisations in the applicant's DAS (presumably deploying a fish-eye lens) which show Bath Court as a light, tree-filled, spacious open area are deceptive.

40. HE flags up serious concern about the adverse impact on Bath Court and the Grade I listed buildings forming the south side of First Court in its letter of 29th July 2025. None of the revisions reduce this impact.

ST ANDREW'S STREET AND THE CENTRAL CONSERVATION AREA

41. The Historic Core Conservation Area (HCCA) Appraisal for St Andrew's Street (2016) meticulously identifies the importance of the frontage of Christ's College to the character and appearance of the east side of the north part of St Andrew's Street. The focal feature of the Gatehouse is flanked by the two-storey ranges either side, which despite later refacing retain their early Tudor character including battlemented eaves. 'The Entrance Court (First Court) buildings rise directly at the rear of the pavement and are imposing in the street scene'.
42. There is a continuum of views of the proposed development along St Andrew's Street. The small number of point-position visualisations and analysis provided by the applicant underestimate the impact of the proposals on the townscape of St Andrew's Street and Christ's Lane and the whole frontage of Christ's College to the street. Paragraph 4.18 of the HS correctly states that 'the elevation forms the western boundary to the college and is therefore one of the most visible elements of Christ's College within the City Centre. The front makes a very important positive contribution to the streetscape and Conservation Area. The quality of Bodley's design and its sympathy with the 16th century range to the north, as well as the age of the fabric and its prominence within this part of the Conservation Area, gives this elevation very high significance'. I would suggest that this 'very high level of significance' equally extends to the gable end and southern elevation, given its high prominence and visibility from a long extent of St Andrew's Street.
43. The excessive scale of the proposal on what is the secondary frontage of Christ's Lane challenges the existing hierarchy of college buildings that is

currently apparent from the street. While of no outstanding architectural quality the existing range of buildings along the north side of Christ's Lane from the Bodley Library to Christ's Pieces presents a quiet, dignified frontage comprising a variety of mellow weathered brickwork, an informal arrangement of openings, and a varied but domestic scale of single, two and three storey buildings and boundary walls.

44. The proposal will be as tall as the main Gatehouse, with its elegant turrets, and considerable higher than the adjoining two-storey ranges on St Andrew's Street. The north-west corner of the Bradwell Court development at the junction of St Andrew's Street and Christ's Lane was deliberately set back and restricted to two storeys in height in order to respect and the scale of Christ's College frontage to St Andrew's, thus preserving and enhancing the character and appearance of the Conservation Area. The set-back of the upper floors continues for the full length of Christ's Lane, as far as Drummer Street, respecting the three-storey scale of the South Range of Second Court.
45. The HCCA Appraisal for Drummer Street and Christ's Lane notes that, following the redevelopment of Bradwell Court (2006-8), Christ's Lane is now one of Cambridge's most populated pedestrian thoroughfares, linking the Lion Yard and Grand Arcade shops with the Drummer Street bus station and, via Christ's Pieces and New Square, the Grafton Centre. It notes how the new shops, framed in limestone, and the Yorkstone paving provide an attractive and active frontage. At the time of publication (2016) the Appraisal noted the recent consent for the Rick Mather scheme and welcomed the removal of the existing incongruous steel flue.
46. The new Bradwell Court and the reopening of Christ's Lane as a public thoroughfare does not justify a new building on its north side of the scale and massing proposed. The Joint Planning Brief, produced in 2002 to guide the redevelopment of Bradwell Court, stated that the proportions of the new Christ's Lane needed to 'feel comfortable in relation to building heights. Building heights along Christ's Lane will need to be designed to avoid Christ's Lane becoming canyon-like and oppressive and to minimise the impact on residents of Christ's College'. When approving the Planning Brief on 5th November 2002, the Environment Scrutiny Committee requested the inclusion of 'a presumption against any in-fill of

the open space fronting St Andrew's Street' and that any 'tunnelling effect onto St Andrew's Street and Christ's Lane be ameliorated'.

47. During the evolution of the development proposals for Bradwell Court the scale and position of buildings fronting onto Christ's Lane was a crucial part of Panter Hudspith's design, and carefully controlled by the local planning authority, protecting the setting and amenities of Christ's College and avoiding Christ's Lane becoming the potential canyon cautioned against in the Joint Planning Brief. The end result is a very successful piece of townscape where the width of the public realm and the height of the buildings are harmonious. The Planning Officer's committee report, dated 20th October 2004, noted (paragraph 8.17) that the parapet height of Bradwell Court had been kept to a maximum of 11.4 metres and that 'the building stops short of the existing gap between Bradwell's Court and Christ's College to provide a widened entrance of over 7 metres into Christ's Lane. The foreshortening eases the relationship in scale with Christ's College whilst at the same time opens up views of Christ's attractive gable window (in the Bodley Library). The roofscape...is stepped back from the frontage facing St Andrew's Street'. All this exemplary consideration and implementation of good contextual urban design twenty years ago is now threatened by the excessive scale of the current proposal.
48. The Turley Submission dated 26th September refers to the variety of other narrow streets and lanes in central Cambridge, but the proportion of street width to building heights in places such as Rose Crescent, Green Street or Petty Cury is never oppressive or canyon-like. In all these other streets the sky component above the buildings is an important part of the quality of the space.
49. The proposal will involve the loss of the existing view from St Andrew's Street of the cupola on the roof of the Hall, on the east side of First Court. The applicant's HS suggests that this is a fortuitous and unimportant view, and therefore of little significance. I disagree. When George Gilbert Scott renovated the Hall between 1876 and 1879, he repaired and re-erected the 18th century timber cupola on a tall plinth to celebrate its visibility. It was intended by Scott and his client to be a landmark feature, to be seen from far and wide. The existing view of the cupola from St Andrew's Street is one of the few available to the general public, from outside the college. It is acknowledged that this view was also blocked by

the Mather scheme, but its loss nevertheless involves a degree of less-than-substantial harm incurred by the current proposal.

50. The applicant's HS 'scopes out', as a relevant heritage asset, the Grade II* listed Lloyd's Bank whose tower is an important landmark at the acute junction with Hobson Street, and thus an important townscape feature in the character and appearance of the Central Conservation Area. While views of the bank, and the Gatehouse of the college, will not be blocked, the excessive height and prominence of the chimneys in the proposed development will distract the eye, and reduce the primacy of the established landmarks.

TALL BUILDINGS POLICY

51. It is considered that the height and massing of the proposal runs contrary to the tall buildings policy with the adopted Cambridge Local Plan (October 2018). While the applicant claims that the policy should not be invoked because of the scale of Bradwell Court to the south it should be noted that the upper floors of Bradwell Court are set back a long way from the street frontages, and particularly on Christ's Lane. The Local Plan tall building policy (page 329) defines a tall building as 'any structure that breaks the existing skyline and/or is significantly taller than the surrounding built form'. It states on page 330 that 'dependent on the exact location within the historic core, buildings of four to six storeys may also need to be evaluated against the assessment criteria herein, due to proximity to heritage assets and potential impacts on key views'.
52. It may well be the case, as claimed in Turley's submission dated 26th September that 'at no point during many months of pre-application discussions has any suggestion been made that detailed assessment against this policy should be made' may well be the case, but if so that represents a serious omission by all concerned.
53. Despite the opinion expressed in paragraph 11 of Turley's submission dated 26th September, the proposal does clearly break the skyline in the important views from St Andrew's Street and is considerably higher than the Bodley Library and First Court buildings which adjoin the site. Given that these are buildings of the highest heritage significance, they form the relevant context in terms of defining heights, rather than Bradwell Court, the taller sections of which are completely invisible from St Andrew's

Street. I consider that the proposals do breach the adopted tall buildings policy, a matter that is not mentioned or considered by either the Urban Design or any of the Conservation Consultation responses from GCSP.

IMPACT ON HISTORIC FABRIC WITHIN THE COLLEGE

54. The applicant's HS notes various internal alterations. I have not been able to inspect these matters so cannot make any comments except to note that the matters of intervention to historic plan form and fabric that are identified in paragraphs 5.29-5.38 (kitchen and wash-up pod) and 5.39-5.47 (Upper Hall and Landing Area) were of concern to the conservation officer and Historic England. The Conservation Consultation Response reiterates 'concerns in relation to the kitchen layout which cannot be supported without amendment'. It considers that the proposed internal pod subdivision is 'clumsy and harmful. It is not accepted that it should be treated as a temporary, reversible intervention, as in reality it would be there for decades.' HE's letter of 29th July 2025 describes the historic buttery as 'a highly significant space within the 16th century building' where the introduction of a large wash-up pod 'would strongly affect the character of this space and ability to understand its historic plan form'.
55. The revised proposals submitted in August 2025 seek to deal with HE's concerns, and HE's letter of 1st September seems to accept that the new location of the wash-up area is less harmful.

ARCHAEOLOGY

56. The 2016 approved scheme involved a basement, resulting in a lower structure above ground. It has been suggested that the current scheme, with no basement, is preferable in terms of archaeology, but it should be noted that, according to the Wills & Clark *Architectural History of the University of Cambridge* 1886 Volume IV there is clear evidence that the site was occupied as a garden for most of its history, labelled on the map as 'Mr Hanwell's Garden 1738. The Bodley Library was built on part of the garden which occupied the frontage to Christ's Lane. While the site is of some archaeological interest it is unlikely to reveal anything that could not be preserved by record. There would be no heritage harm caused by a basement. The reiteration in Turley's submission of 26th September that

archaeology would be an impediment to excavation for a basement is unfounded.

SUMMARY OF HERITAGE HARM

57. HE's letter of 29th July concludes that 'the proposals would result in certain levels of harm to the significance of the listed buildings, primarily as a result of the excessive bulk of the new building, which we consider would detract from the setting of the surrounding buildings.' I agree with this summary but would identify the level of harm more specifically as set out below.
58. The proposals, by reason of their height, bulk and massing cause the following degrees of harm to designated heritage assets:
- Less-than-substantial harm at the upper end of the scale to the setting of the Grade I listed Bodley Library
 - Less-than-substantial harm at the middle of the scale to the setting of the Grade I listed north range of Bath Court
 - Less-than-substantial harm at the lower/middle of the scale to the character and appearance of the Central/Historic Core Conservation Area including 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 in the Grade I listed kitchen and Upper Hall areas

HERITAGE BENEFITS

59. The applicant claims that certain aspects of the proposals are positively beneficial. The applicant's HS suggests in paragraph 5.28 that the overall works to Bath Court, including the proposed landscaping will result in considerable visual enhancement, including improvements to the existing drainage ditch. In my opinion these benefits will be more than outweighed by the overwhelming bulk of the proposed new building and its negative impact on the setting of the north side of Bath Court.
60. Various heritage benefits are also suggested as part of the internal works to the kitchens and Upper Hall, but these appear to be minor and when

balanced against the concerns noted in paragraph 49 above, the overall impact is perhaps neutral.

BALANCING HARM AGAINST PUBLIC BENEFITS

61. The applicant's HS asserts in paragraph 6.16-6.17 that paragraphs 214 and 215 of NPPF do not apply to the current application. I firmly disagree with this position. In my opinion, the proposals do cause less-than-substantial harm to designated heritage assets which triggers consideration of paragraph 215 of NPPF. This states that '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'. I do not consider that the heritage benefits claimed by the applicant outweigh the harm. I do not agree with the applicant's assertion that the proposal provides 'clear benefit/enhancement to the character and appearance of the Conservation Area'.
62. In my judgement it therefore follows that the townscape impact of the proposed development is not a public benefit. Good design, in any event, is a basic requirement of all development, and not in itself a public benefit. In my opinion the proposals cause harm, not improvement, to the townscape. The provision of benches or planting to Christ's Lane is a very minor matter, on land outside the ownership of the applicant, and something that could be easily provided without reliance on the proposal.
63. Incorporating the requirement of paragraph 212 of NPPF that great weight should be given to the conservation of heritage assets (and even more so when the heritage assets of very high significance), it is my opinion that the public benefits do not outweigh the harm.

AN ALTERNATIVE SCHEME

64. A relevant consideration in considering the balance of harm against public benefit is whether there is an alternative scheme that could deliver the aims of the proposed development whilst causing a lesser amount of harm. The alternative scheme prepared by Create Streets on behalf of the Christ's Lane Action Group shows that a four-storey development could be achieved by excavating a basement which would result in three storeys

above pavement level, thus having reduced impact on the townscape and the setting of heritage assets. This is similar in approach to the approved 2016 scheme which included a basement. Create Streets' elevation studies and projected views from St Andrew's Street show how a contextual approach could preserve the setting of the Bodley Library and preserve and enhance the character and appearance of the Conservation Area.

65. It was concluded during consideration and approval of the 2016 scheme that excavation of a basement was acceptable in heritage terms, and did not come close enough to the north side of Bath Court to cause structural problems. There were no archaeological objections to the construction of a basement. The current proposed scheme in any event involves a degree of excavation for rainwater storage and other services.

CONCLUSION

66. In conclusion the proposals for the development on Christ's Lane and Bath Court cause various degrees of less-than-substantial harm to several designated heritage assets of the very highest significance. Taken cumulatively I assess this degree of harm to be within the middle range of less-than-substantial harm. This harm is not outweighed by heritage benefits, either within the college or in the surrounding townscape. The other public benefits offered by the applicant, such as benches along Christ's Lane, are of a very minor nature, and could easily be provided without relying on the proposed development. Furthermore, the alternative scheme presented by Create Streets shows that the requirements of the applicant could likely be met by a revised and more contextual scheme that causes a much lower degree of harm to the significance of heritage assets and which would preserve and enhance the character and appearance of the conservation area. The proposals fail to meet the fundamental test required by Paragraph 215 of NPPF. The proposals submitted by the applicant should not be approved in their current form.

October 2025

Alec Forshaw IHBC, MRTPI, MA (Cantab), has over 50 years of experience in the heritage sector. He was Principal Conservation and Design Officer with the London Borough of Islington 1975-2007 and has subsequently appeared as heritage witness on behalf of SAVE Britain's Heritage, the Victorian Society and the Spitalfields Trust at many public inquiries, including Smithfield Market, Liverpool Welsh Streets, Norwich Anglia Square, Custom House and Oxford Street M&S. He has written extensively about heritage and design issues including *Contemporary Architecture in the City of London*, *Brussels Art Nouveau*, *An Address in Bloomsbury* and *Cuba*. He was born and educated in Cambridge and is the author of *Growing Up in Cambridge* (History Press 2009).