Historic England

[redacted]

Our ref:
PL00019981
Your ref:

Telephone
[redacted]

12 June 2019

Dear Sir or Madam,

re: Pre-Submission Draft of the Northampton Local Plan

Thank you for consulting Historic England about the Pre-Submission Draft of the Northampton Local Plan. We have the following comments to make on this latest iteration of the document:-

General Comments

Notwithstanding the advice given in this letter, we reserve the right at a later stage to comment or object to any proposals that come forward as part of the Local Plan.

Where we have not commented on a site allocation which has current planning approval this is not to say that Historic England will not comment or object during a future consultation should the permission expire.

It is noted that several sites are proposed within Conservation Areas or adjacent to / including heritage assets, such as Grade II Listed Buildings. As with all proposed sites, please ensure that your Conservation Officer has been consulted. Where we have not commented on a site, it is because we are not aware of any issues with regard to designated heritage assets or areas of high archaeological value, but there may be potential archaeological or historic landscape issues that the HER and county archaeological advisors will be able to identify. **We recommend that local authority archaeology and conservation expertise should be used in relation to all heritage assets for the site allocations proposed and considered.**

Detailed Comments

Our detailed comments on the Policy framework of the Plan are set out in Appendix A and on the proposed Allocations in Appendix B. Historic England would be very

Appendix A: Table of Historic England's comments on the Pre-Submission Draft of the Northampton Local Plan

[Historic England's comments on the proposed Allocations are set out in Appendix B]

Page	Section	Sound/ Unsound	Comments	Suggested Change
29	3	Sound	Objective 6 is welcomed	-
33	5	Sound	Policy 2: Placemaking – bullet point 4 is welcomed	-
52	7	Unsound	Policy 12: Housing Allocations, subject to the changes suggested in Appendix B	See Appendix B
81/92	10	Sound	Policy 27: Protection and Enhancements of designated and non-designated heritage assets is welcomed	-
91/94	13	Unsound	Policy 33	See Appendix B
95	13	Unsound	Policy 34 Northampton Railway Station	See Appendix B
[redacted]				
102	13	Unsound	Policy 37 Greyfriars	See Appendix B
104/105	13	Unsound	Policy 38 Ransome Road	See Appendix B
	Evidence Base	Unsound	Historic England **object** to the plan as the evidence base is insufficient, contrary to the NPPF, in particular paragraphs 31 and 35. Paragraph 31 states that "the preparation and review of all policies should be underpinned by relevant and up-to-date evidence." Heritage is not included on the evidence base webpages, which was raised during our 2017 response. The Sustainability Appraisal site assessments are not comprehensive in their assessment of heritage. Many of the sites proposed should be supported by detailed heritage assessments due to the significance of the heritage assets potentially affected. .	The evidence base should be updated to include heritage in accordance with the NPPF. If the evidence is already available, please ensure it its added into the evidence base. Particularly relevant to site and allocations and designations could include the following:-

Page	Section	Sound/ Unsound	Comments	Suggested Change
			Whilst it is accepted that S66 of the Planning (Listed Buildings and Conservation Areas) Act, 1990 does not apply, specifically, to Plan making, the absence of any evaluation to address 'uncertainty' outcomes in the evidence base for the Plan must bring into question the deliverability of a number of those particular sites and, for some, the amount of development they can accommodate. When the requirements of the Act are eventually undertaken as part of application considerations, it may be found that the quantum of development on some of the sites is, either, unachievable or, at worst, that the need to safeguard the setting of the building actually renders them largely undevelopable.	• Updating conservation area appraisals • Undertaking characterisation studies • Producing setting studies – of specific settlements, or specific heritage assets • Local lists • Assessments of landscape sensitivity •Heritage Impact Assessments for site allocations with the potential to affect heritage assets, with particular emphasis on those listed in Appendix B; this aspect is of particular importance.

Appendix B: Table of Historic England's comments on the proposed Allocations in the Pre-Submission Draft of the Northampton Local Plan

[Historic England's comments on the remainder of the Local Plan are set out in Appendix A]

Site Ref.	Location	Sound/ Unsound	Comments	Suggested Change
0167	Tanner Street	Unsound	A joint site specific policy is required to ensure that full archaeological investigations are carried out prior to development and that the setting of heritage assets are protected, including the Scheduled Monument to the north and north east, 1006620 Saxon palace complex and Saxon and medieval urban deposits and the Grade I listed Church of St Peter, together with other heritage assets.	Given the high heritage value of the site, a site specific criteria(s) is needed incorporating the comments in the adjacent box. HE would be very happy to advise on wording and agree via SOCG.
0174	Ransome Road Gateway	Unsound	Due to the Conservation Area and battlefield to the south, a site specific policy is required to restrict the height of future buildings on the site in order to protect the setting of heritage assets. It is concerning that this is not flagged within the SA Site assessments.	As above.
0288/ 0333	Railway Station Car Park	Unsound	These sites are of particularly high heritage sensitivity. Whilst the SA site assessment is welcomed, a Heritage Impact Assessment and archaeological investigation, prior to design, will be required. The evidence base is insufficient in this regard. Site specific policy 34 should be revised to include criteria for additional archaeological investigation which may affect the developable area, to highlight the interconnectivity between the non-designated parts of Northampton Castle and that designated a scheduled monument. Opportunities should be sought in any forthcoming design to emphasise the presence and importance of the castle. The design	As above

Site Ref.	Location	Sound/ Unsound	Comments	Suggested Change
			principles must also include a restriction on the height of potential buildings in order to protect the setting of the castle and other heritage assets.	
0598	Car Park, Victoria Street	Unsound	A site specific policy is required to ensure that the height of potential buildings are restricted in order to protect the setting of nearby heritage assets, including the Conservation Area and Grade I listed Church of Holy Sepulchre	As above
0818	St Peter's Way	Unsound	A joint site specific policy is required to ensure that an archaeological assessment is carried out and that the height of potential buildings are restricted in order to protect the setting of nearby heritage assets, including the Scheduled Monument to the north and north east, 1006620 Saxon palace complex and Saxon and medieval urban deposits and the Grade I listed Church of St Peter.	As above.
0931	Sites in Green Street	Unsound	A site specific policy is required to ensure that the setting of the scheduled monument to the north (1006620) is protected, restricting the height of any buildings on the proposed site.	As above.
1010	St Peters Way	Unsound	The site includes the Scheduled Monument, 1006620 Saxon palace complex and Saxon and medieval urban deposits. This site is of high sensitivity and will require very careful engagement with Historic England. A joint site specific policy will be required given this sensitivity to ensure that an archaeological assessment informs proposals and opportunities to sustain and enhance the heritage asset should be sought. Reference to heritage within the recommendation for allocation within the SHLAA is welcomed, however the site appears to be	As above.

Site Ref.	Location	Sound/ Unsound	Comments	Suggested Change
			missing from the SA Site Assessments.	
1098	The Green, Great Houghton	Unsound	Concerns are raised regarding potential impact upon Great Houghton CA. Its historic character as a distinct settlement, separate from Northampton will be harmed; assessment and investigation of archaeological potential on the site will be required.	As above
1113	Greyfriars	Unsound	Whilst Policy 17 is welcomed (together with the recognition of heritage assets nearby within the SA Site assessment), more detailed criteria is required to restrict the height and massing of potential buildings on site, together with a criteria for further archaeological assessment given the particular significance of the site.	As above.
1139	Ransome Road	Unsound	Very strong concerns are raised regarding this potential allocation. The site is partly on the Registered Battlefield and is of particularly high heritage sensitivity. The allocation site near the water is where many of the troops lost their lives in the Battle. To the south is Delapre Park Conservation Area and Grade II* listed Delapre Abbey and stable block and other heritage assets, their setting is of particular importance. The area of the Registered Battlefield must be excluded from the developable area and any forthcoming development will require a heritage assessment to assess the impact of the proposal on the heritage assets. This evidence led approach may require that other areas are excluded from the developable area in order to preserve the significance of the heritage assets.	Further assessment and investigative work is required; together with a site specific criteria, again to be agreed by SOCG.