

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
100	13	Unsound	Policy 36 The Green, Great Houghton	See Appendix B
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 is added into the evidence base. Particularly relevant to site and allocations and designations could include the following:-

Page	Section	Sound/ Unsound	Comments	Suggested Change
			<p>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.</p>	<ul style="list-style-type: none"> • 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.

[REDACTED]

From: [REDACTED]
Sent: 28 June 2019 10:05
To: [REDACTED]
Subject: FW: Response to Northampton LPP2 - Submission Draft

Follow Up Flag: Follow up
Flag Status: Flagged

Hi [REDACTED]

Not sure if this needs recording for HE too.

Thanks,
[REDACTED]

From: Carr, Emilie [REDACTED]
Sent: 25 June 2019 16:24
To: [REDACTED]
Subject: RE: Response to Northampton LPP2 - Submission Draft

Thanks [REDACTED]

Yes, I would agree with the reasons for unsoundness in the table below,

Kind regards,

Emilie

Emilie Carr | Historic Environment Planning Adviser |
(Tues, Weds; alternate Thurs)
Telephone: [REDACTED]

Historic England | Midlands Regions Group | The Axis | 10 Holliday Street |
Birmingham | B1 1TF |

www.HistoricEngland.org.uk

Please note that Historic England's East Midlands and West Midlands offices have merged and our Northampton office is now closed. Our Midlands office is based in Birmingham and contact details can be found on our Midlands Regional Office webpage [here](#).



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From: [REDACTED]
Sent: 18 June 2019 09:14
To: Carr, Emilie
Cc: [REDACTED]
Subject: Response to Northampton LPP2 - Submission Draft

Dear Emilie,

Thank you for your response to the Northampton Local Plan Part 2 Proposed Submission Draft (Regulation 19) consultation.

As this is the Regulation 19 consultation, we need to be absolutely clear that your comments are processed correctly in terms of the Plan's legal compliance and soundness.

Your representations identify the following sites / policies / evidence as unsound. I have assumed you consider them unsound for the reasons outlined in the table below but please can you clarify if this is not the case.

Page	Section	Comments		Reason for unsoundness
52	7	Policy 12 (housing allocations)	0167 – Tanner Street	Not justified
			0174 – Ransome Road Gateway	Not justified
			0288 / 0333 – Railway Station Car Park	Not justified
			0598 – Car Park, Victoria Street	Not justified
			0818 – St Peter's Way	Not justified
			0931 – Sites in Green Street	Not justified
			1010 – St Peter's Way (Land at St. Peter's Way / Court Road / Freeschool Street	Not justified
			1098 – The Green, Great Houghton	Not justified
			1113 - Greyfriars	Not justified
			1139 – Ransome Road	Not justified
91/94	13	Policy 33	As per sites mentioned above	Not justified
95	13	Policy 34 – Northampton Railway Station		Not justified
98	13	Policy 35 – Martin's Yard Extension		Not justified
102	13	Policy 37 - Greyfriars		Not justified

104/105	13	Policy 38 – Ransome Road		Not justified
	Evidence Base			Not consistent with national policy

For the time being we are processing responses but I have noted that NBC and Historic England will need to meet to discuss the objections made. Therefore I will be in touch with dates.

Best,
Amanda

Amanda Jacobs – MRTPI | Senior Planning Officer



Northampton Borough Council | Planning Policy & Heritage | The Guildhall, St Giles Square, Northampton, NN1 1DE | 0300 330 7000

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[REDACTED]

From: Amanda Jacobs
Sent: 28 June 2019 10:05
To: Mike Burgess; Planning Policy; Noreen Banks
Subject: FW: Response to Northampton LPP2 - Submission Draft
Attachments: Northampton Table of Comments on HE Pre-Submission Policies June 19 revised policy 35.36 response.pdf

Follow Up Flag: Follow up
Flag Status: Flagged

Hi Mike,

Please see Historic England's revised response.
Thanks,
Amanda

From: Carr, Emilie [REDACTED]
Sent: 25 June 2019 21:30
To: Amanda Jacobs [REDACTED]
Subject: RE: Response to Northampton LPP2 - Submission Draft

Thanks Amanda

I have revised our response in relation to the error between policies 35 and 36, apologies for the error. Please find attached.

1. Policy 35 was listed in error, Historic England do not find this policy unsound.
2. Policy 36 should be listed as unsound on Appendices 1.

Kind regards,

Emilie

Emilie Carr | Historic Environment Planning Adviser |
(Tues, Weds; alternate Thurs)
Telephone: [REDACTED]

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From: Amanda Jacobs [REDACTED]
Sent: 18 June 2019 11:21
To: Carr, Emilie
Cc: Noreen Banks; Paul Everard
Subject: RE: Response to Northampton LPP2 - Submission Draft

Dear Emilie,

I have another couple of queries on your response to the Northampton LPP2.

1. You have found Policy 35 (Martin's Yard Extension) unsound. This site (1005) is also listed in Policy 33.
 - a. Do you also find Policy 33, site 1005 unsound?
 - b. The original response did not include any reasons as to you why you considered this site unsound therefore please could you provide details.
2. You have not found Policy 36 (Site 1098, The Green, Great Houghton) unsound however you have found this site unsound through policies 12 and 33. Do you wish to revise comments and include Policy 36 as unsound?

Thanks,
Amanda

From: Amanda Jacobs
Sent: 18 June 2019 09:14
To: [REDACTED]
Cc: Noreen Banks [REDACTED] Paul Everard [REDACTED]
Subject: Response to Northampton LPP2 - Submission Draft

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Amanda Jacobs – MRTPI | Senior Planning Officer

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