

Mike Burgess

From: Worrall, Rosamund <[REDACTED]>
Sent: 13 November 2017 16:57
To: Planning Policy
Cc: Carr, Emilie
Subject: NLP Part 2 sites consultation - Historic England response
Attachments: HE response - NLP Part 2 Sites consultation - Nov 17.docx

Follow Up Flag: Follow up
Flag Status: Flagged

Dear Rob

Please see Historic England's comments in respect of the preferred sites consultation.

We would be happy to discuss any issues arising with you in due course if you feel this would be helpful.

Kind regards,

Rosamund Worrall
Historic Environment Places Adviser (East Midlands)

Historic England | Windsor House, 2nd Floor | Cliftonville | Northampton | NN1 5BE

M. [REDACTED]



We help people understand, enjoy and value the historic environment, and protect it for the future. [Historic England](#) is a public body, and we champion everyone's heritage, across England.

Follow us: [Facebook](#) | [Twitter](#) | [Instagram](#) Sign up to our [newsletter](#)

Help us create a list of the 100 places which tell England's remarkable story and its impact on the world. [A History of England in 100 Places](#) sponsored by [Ecclesiastical](#).

This e-mail (and any attachments) is confidential and may contain personal views which are not the views of Historic England unless specifically stated. If you have received it in error, please delete it from your system and notify the sender immediately. Do not use, copy or disclose the information in any way nor act in reliance on it. Any information sent to Historic England may become publicly available.

Consultation guidance notes

The Council would prefer to receive representations to this consultation online at www.northampton.gov.uk/lp2sitesconsultation

If you would prefer to complete this form, please return it to

Planning Policy
Regeneration, Enterprise & Planning
Northampton Borough Council,
The Guildhall, St Giles Square
Northampton
NN1 1DE

Please note, all representations must be received by 5.00 pm on 13 November 2017.

All observations, objections and supporting comments submitted to Northampton Borough Council are public documents. Therefore the information you submit in response to consultations on the Local Plan will be publicly available as part of the consultation responses and made available for any member of the public to view in person. This may include your name and the comment made.

Specific personal contact data such as your email address, signature, postal address and telephone number will not be published on the Northampton Borough Council website but retained for contact purposes only by the planning department at Northampton Borough Council.

In submitting a comment on the Local Plan you agree for your information to be held and processed for the purpose(s) and in the way detailed above.

If you have any questions, please contact us by email at: [REDACTED] or by telephone: [REDACTED].

Where can I view the consultation documents?

You can view the consultation documents in the following ways:

- On the Council's website at www.northampton.gov.uk/lp2sitesconsultation. You can also submit your comments electronically through this link
- At the One Stop Shop, The Guildhall, St Giles Square, Northampton NN1 1DE
- At all libraries within Northampton Borough

If you need copies of consultation documents in translated or other formats, please refer to the Council's website at:

www.northampton.gov.uk/info/200041/equality_and_diversity/1309/interpreting

Your contact details

1. Please provide your contact details in the boxes below:

Name*	Miss Rosamund Worrall
Position (if appropriate)	Historic Environment Planning Adviser
Company (if appropriate)	Historic England
Address 1*	2 nd Floor, Windsor House
Address 2	Cliftonville
Town	Northampton
Postcode*	NN1 5BE
email address	[REDACTED]
Phone number	[REDACTED]

* required field

2. Are you an agent responding on behalf of another?

Yes No

3. If you are an agent responding on behalf of another, please enter your details below:

Name*	
Position (if appropriate)	
Company (if appropriate)	
Address 1*	
Address 2	
Town	
Postcode*	
email address	
Phone number	

* required field

4. Which sites that have been assessed as being suitable for further consideration (Appendix A) do you think are most appropriate for development?

Please state site number(s) – e.g. LAA0999 - and tell us why you think each site is most appropriate

Historic England's role is to advise on the Plan's approach to the consideration of the historic environment. Our main comments are included in section 5 below.

5. Which sites that have been assessed as being suitable for further consideration (Appendix A) do you think are least appropriate for development?

Please state site number(s) – e.g. LAA0999 - and tell us why you think each site is least appropriate

General comments

The Land Availability Assessment 2017 includes very sparse information in respect of NBC's approach to the historic environment and in some cases relevant information is not included which does not result in a robust evidence base for the historic environment. However, we note that this issue is addressed more fully in the accompanying SA, and that officer assessment work has been included in that document which is helpful and should be used to inform any specific site policies which may come forward as the Plan progresses.

Insofar as sites which raise uncertainty outcomes, including LAA0288; LAA0749; LAA0814; LAA1100; LAA1009; LAA0659; LAA1098; LAA1027; LAA1022; LAA1023; LAA1107; LAA0689; LAA1014; and LAA1112, we would suggest that further work is required prior to the next iteration of the sites document in order to provide clarity about potential impact on the historic environment.

(continued ...)

Q5 continued.... (Historic England response)

It is not clear where SA information for the addendum sites is located (LAA0598; LAA1005; LAA1010; LAA1007; LAA0208; and, LAA1006)

On the basis of the documents being read as a whole Historic England has strong concerns about the assessment of two particular sites as follows:

LAA0288 – The LAA 2017 does not mention the GII Postern Gate or the potential for non-designated archaeology but the SA does. It is not clear how the LAA 2017 has considered the SM, LB and non designated archaeology in respect of the 270 dwellings proposed. Any new development would need to take a sensitive approach to the heritage assets and opportunities to enhance understanding should be explored. It is expected that further work will be required in relation to this preferred site in relation to what could be achieved at this site, prior to the next stage of the Plan.

LAA1098 – The LAA 2017 indicates ‘no existing designations’ for the site in its ‘built environment’ section. However, it is noted that the SA offers more information on the site in respect of the historic environment. The proposed inverted L-shape part of the preferred allocation will cause substantial harm to the historic environment which cannot be mitigated against and we would reiterate concerns raised in respect of planning applications N/2014/0068 and N/2016/0412. Archaeological work indicated high potential for the preservation of archaeological remains. In addition the coalescence of settlements would cause harm to the Conservation Area and Listed Buildings. As such this brings into question the potential for the delivery of No.840 dwellings on the overall collection of sites included in LAA1098.

Plan soundness - Paragraph 126 of the NPPF requires Local Plans to set out a positive strategy for the conservation and enjoyment of the historic environment. This means that the sites it is putting forward as allocations has to set out a framework which is likely to conserve the historic environment of the Plan area.

The Plan puts forward a number of sites which, if developed, will affect the significance of one or more designated heritage assets in their vicinity. The Allocation of a site for development within the Local Plan is, in effect, establishing that the principle of development in that particular location is acceptable. However, in the case of this Plan, at present, there should be more evaluation of what impact the development of these areas might have upon those heritage assets.

In terms of national policy guidance, the Plan will need to demonstrate that:

(a) The sites that it is putting forward for development will deliver a “positive strategy for the historic environment” as is required by NPPF Paragraph 126;

(b) The sites that are allocated will be likely to “contribute to protecting or enhancing the historic environment” – at present we would submit that the Plan has not shown that it is likely to deliver sustainable development in terms of the historic environment (NPPF Paragraph 7);

(c) The sites which it has allocated are likely to “conserve heritage assets in a manner appropriate to their significance” – at present we would submit that the Plan has not shown that it will be likely to deliver the Government’s objectives for the historic environment (NPPF Paragraph 17);

(d) It has complied with the statutory duty under S72 of the Planning (Listed Buildings and Conservation Areas) Act, 1990 to pay “special attention” to “the desirability of preserving or enhancing the character or appearance” of its Conservation Areas.

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.

We would be pleased to continue to engage with you on these issues as the Plan progresses to its next stage.

6. Which sites do you think should be protected from development?

Please state site number(s) – e.g. LAA0999 - and tell us why you think each site should be protected from development

N/A

7. Are there any sites that have been assessed as not being suitable for further consideration (Appendix B) that should be?

Please state site number(s) – e.g. LAA0999 - and tell us why you think each site is suitable for further consideration

Historic England unfortunately does not have capacity at this time to go through the sites which have been assessed as not being suitable for further consideration. However, should any of those sites, or alternative sites, come forward as the Plan progresses we would be pleased to comment on those at such a time.

8. Are there any sites which you think should be used for other purposes?

Please state site number(s) – e.g. LAA0999 - and the best use for the site, e.g.:

- Residential
- Employment
- Retail
- Community facilities
- Open or green space
- Waste
- Other (please specify)

N/A

9. Are there any other sites you think are suitable for the Council to consider in preparing the Local Plan Part 2? Please give further details, and submit details by email using the call for sites form available on the Council's website (northampton.gov.uk/lp2sitesconsultation)

N/A

10. Do you have any comments on the Sustainability Appraisal of Site Options?

SA Objectives 7 (Town centres), 10 (Landscape and townscape) and 11 (Historic environment) are welcomed.

A number of preferred sites have '?' uncertain outcomes linked to the assessment of SA Objective 11. There should be clarity about the impact of the preferred option on the historic environment in the next iteration of the Plan documents. An uncertain outcome indicates that further work is required to inform the allocation process. It is noted that Para 3.28 of the SA sets out that the heritage potential should be known prior to allocation of the site.

Appendix 2 – it is not clear why the assessment of residential and employment sites are different in respect of SA Objective 11. Distances are also included in the employment criteria which was a matter raised in previous comments.

Appendix 3 – it is not clear why some employment sites' information ends at SA Objective 7.

It has not been possible to locate the SA information for the addendum sites which were sent through at a later date than the original consultation.

11. Do you have any comments on the information to support the Habitats Regulations Assessment?

N/A