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**From:** Carr, Emilie [REDACTED]  
**Sent:** 25 August 2020 16:29  
**To:** Paul Everard; Noreen Banks  
**Subject:** Local Plan consultation response  
**Attachments:** Northampton presub LP covering letter Aug 2020.pdf; Northampton Table of Comments on HE Pre-Submission Policies August 2020.pdf

Hi Paul and Noreen

Please find attached consultation response. I would be very happy to fill in a cover sheet with my contact details if a word version can be provided, I have been unable to convert that on the website.

Thanks in particular Noreen for all your help with my queries in the last few weeks.

Please contact me to discuss the SOCG,

Kind regards,

Emilie

Emilie Carr | Historic Environment Planning Adviser |  
(Tues, Weds all day; part days Mon, Thurs)  
Telephone: [REDACTED]

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

[www.HistoricEngland.org.uk](http://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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Historic England

[Redacted]

Our ref:  
Your ref: PL00019977

Telephone [Redacted]

26 August 2020

Dear Mr Everard

**re: Pre-Submission Draft of the 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

Thank you for providing the Heritage Impact Assessment and the amendments to the policies, it is considered that our comments can be addressed by Statement of Common Ground.

Detailed Comments

Our detailed comments are set out in Appendix A.

Please contact me with any queries and to commence work on the Statement of Common Ground.

Yours sincerely

[Redacted signature]

Emilie Carr (Mrs)  
Historic Environment Planning Adviser  
E-mail: [Redacted]



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

Telephone 0121 6256888 [HistoricEngland.org.uk](http://HistoricEngland.org.uk)

Please note that Historic England operates an access to information policy.

Correspondence or information which you send us may therefore become publicly available.



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

Page	Section	Sound/ Unsound	Comments	Suggested Change
20	2	Sound	Paragraph 2.27 and Figure 7 are welcomed.	-
34	3	Sound	Objective 6 is welcomed	-
38	5	Sound	Policy 2: Placemaking – bullet points 4, 6 and 7 are welcomed	-
62 and 115	7	Unsound	Policy 13 and 38 – Residential and other residential led allocations / Development Allocations, subject to the changes suggested.	Please see site specific comments below
102	10	Sound	Policy 31: Protection and Enhancements of designated and non-designated heritage assets and its supporting text is strongly welcomed	-
118	13	Unsound	Policy 39 Northampton Railway Station	The text is much improved and draws on the production of the HIA and its revisions to highlight the sensitivity and the levels of truncation in the inner bailey area and castle mound. The policy however remains unsound without amendment. The first policy criteria bullet point should be amended to read “ <u>A high quality development that preserves and enhances the significance and appreciation of the former castle site, its designated components and their setting. Design</u> ”

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				<p><i>and capacity will be informed by detailed archaeological investigations and assessments in advance of development</i>". This would ensure that the archaeology continues to guide the development that comes forward and ensures that Historic England can comment fully at planning application stage.</p> <p>Historic England would be happy to agree this and all other changes suggested below by SOCG.</p>
123	13	Sound	Policy 41 The Green, Great Houghton	The policy amendments following the HIA are welcomed.
126	13	Sound	Policy 42 Greyfriars	The policy amendments following the HIA are welcomed.
128	13	Unsound	Policy 43 Ransome Road	<p>Whilst the reduction in size of the allocation is welcomed, objections remain to the policy as proposed.</p> <p>The words <i>'at least'</i> must be deleted from the first sentence and replaced with <i>'up to'</i> to ensure clarity and that heritage assets are conserved and enhanced.</p> <p><b>First policy criteria</b> The policy states that proposals should "Generally</p>

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				<p>be two to four storeys in height, with opportunities for taller buildings facing along the principal movement routes and the northern section of the site". This does not accord exactly with the wording in Policy 41 of the HIA (page 105) which states that proposals should 'Be two to four storeys in height, with taller buildings facing along the principal movement routes and the northern section of the site.' It appears that the intention of the HIA was to restrict the height of buildings on the site to 4 storeys max, with those 4-storey buildings being further away from sensitive heritage assets. The Local Plan Policy implies there are opportunities for buildings taller than 4 storeys on the site. Historic England would object due to the impact that would have on the nearby very sensitive heritage assets such as the Battlefield, Delapre Abbey, the Abbey parkland and Conservation Area. As such policy criteria bullet point one should be reworded for clarity to read:-</p> <p><i>"Generally be two to <u>a maximum of four storeys in height</u>, with opportunities for <u>the taller building facing along the principal movement routes and the northern section of the site.</u>"</i></p> <p><b>Suggested additional policy criteria</b> The removal of the portion of the Registered Battlefield from the allocation is welcomed by Historic England. Although the remainder of the site is undesignated and has been subject to</p>

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				<p>industrial uses in the 19<sup>th</sup> and 20<sup>th</sup> centuries it retains the potential to yield archaeological information relevant to the Registered Battlefield. This is recognised in the HIA, which highlights the potential for battlefield archaeology to be present including encampments, along with remains of the medieval church that would have formed a component of the wider battlefield.</p> <p>We have previously advised that archaeological assessment through geophysical survey, metal detecting and excavation should be a pre-cursor to allocation, to create a sufficiently robust evidence base to ensure any proposed allocation is deliverable in accordance with national and local policies.</p> <p>As the allocation will be in advance of archaeological assessment of the site, the policy should require assessments to be carried out at an early stage to provide fuller understanding of the sensitivities of the site and inform the design process. We advocate that the allocation should have sufficient flexibility to enable areas of significant archaeological remains to be protected within areas of the development's green space'. Therefore an additional policy criteria should be</p>

Page	Section	Sound/ Unsound	Comments	Suggested Change
				added to state:-  <u><i>“Prior to development of the site, further archaeological assessment will be required to inform development and layout of the site”</i></u>
131	13	Sound	Policy 44 Sites in Tanner Street	The additional policy is welcomed following the HIA.
	Evidence Base	Unsound	<p>Whilst the evidence base is much improved, with the provision of a detailed Heritage Impact Assessment and the Battlefield Conservation Management Plan, a broader evidence base is still required to reflect heritage assets across the borough, such as including Conservation Area appraisals and Local Lists within the evidence base pages. As proposed, the evidence base remains 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.”</p> <p>Whilst it is accepted that S66 of the Planning (Listed Buildings and Conservation Areas) Act, 1990 does</p>	<p>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:-</p> <ul style="list-style-type: none"> <li>• Updating conservation area appraisals and including those already available within the evidence base</li> <li>• Undertaking characterisation studies</li> <li>• Local lists</li> <li>• Assessments of landscape sensitivity</li> </ul>

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			<p>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>	