

## Lucy Staves

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**From:** Ann Plackett <[REDACTED]>  
**Sent:** 07 June 2016 16:26  
**To:** Planning Policy  
**Cc:** Sue Biddle  
**Subject:** Comments on the Local Plan Review Issues Report from the Town Centre  
Conservation Areas Advisory Committee  
**Attachments:** TCCAAC Local Plan Issues May 16.pdf  
**Importance:** High

Please find the comments from the Committee attached.

Regards,

Ann Plackett  
(Secretary)



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## Comments from the Northampton Town Centre Conservation Areas Advisory Committee on the Northampton Local Plan Review Issues Report

The Northampton Town Centre Conservation Areas Advisory Committee Terms of Reference set out its main purpose as being 'to encourage the preservation and enhancement of the special historical and architectural character of Northampton's town centre conservation areas'. This includes advising the local planning authority on planning applications affecting the conservation areas and identifying where actions have been taken that detract from the character of the conservation areas, e.g. planning breaches. The Committee would be happy to discuss with the Local Plan team, possible policies for the conservation and enhancement of the town centre conservation areas. Our comments on the Issues Report are set out below.

Q1. What are the main issues relating to housing delivery, mix and affordability which the Local Plan (Part 2) should consider? The Local Plan (Part 2) will not be reviewing the number of new homes that is already identified in the adopted Joint Core Strategy.  
And

Q3 Do you think that we need a mix of market housing e.g. family homes, housing for single households

In the town centre the main issue is the lack of a good mix of different types of housing to support a diverse community, in terms of age, household size, wealth etc. There are too many tiny flats (and more recently HIMOs) which attract only transient residents (including students), who will want to move on, rather than the mixed balance we need of families, couples, retired and single people: those building a life in Northampton and others passing through but contributing to the variety of the community whilst here. A balance is needed to restore and maintain the vibrancy necessary to regenerate the town centre and safeguard its heritage assets.

Q5 Is there evidence to support the Local Plan (Part 2) introducing the optional national housing technical standards in relation to access and space standards?

The town centre applications we have seen in recent years have been for smaller and smaller units which have very poor amenity for residents. Opting in to standards for space would therefore be a good thing.

Q8 Outside of the Enterprise Zone, are there any other existing employment areas where opportunities could be improved and vacancy rates could be addressed? If so, how could this be achieved?

Remaining disused shoe factories and other redundant buildings in the Boot and Shoe Quarter would be excellent for sensitive conversion to employment uses, saving heritage assets and close enough to the town centre to contribute to its vitality and benefit from its services. Grants for the sensitive conversion of disused factories would help, as would plentiful advice on heritage issues and a marketing campaign to attract businesses (and later) the public. E.g. fashion, light engineering, creative industries.

Q11 How do we ensure a successful town centre in light of changes to shopping habits such as increased use of out of town retail and on-line shopping? The Local Plan (Part 2) will not be reviewing the retail growth which is set out in the adopted Joint Core Strategy.

Shopping habits have changed so much that town centres need to be viewed differently. A much more mixed usage is needed, with multiple recreational/leisure uses and more events to encourage people into the centre. Shopping (and eating) can no longer be seen as the main attraction of a town centre. Notwithstanding, following the loss of House of Fraser, the town centre would benefit from attracting higher end retail businesses, both high class chains and independents, including a town centre presence for the shoe industry of Northampton. This would benefit restaurants etc. and would help to ensure the restoration and regeneration of historic buildings in streets such as Gold Street, Bridge Street and Drapery. Northampton Market could

also be improved and the Market Square enhanced to reflect its historic significance.

**Q12 Are there areas where the location of betting shops and hot food takeaways should be restricted?**

Anywhere where there is already a concentration of betting shops and hot food takeaways would benefit from a restriction, e.g. no more than 3 such establishments within 100 metres, or where there are existing anti-social problems related to these uses (e.g. litter from takeaways). The area around Abington Square and the top of York Road has an over-concentration of takeaways, so would be a candidate for restriction. Similarly Gold St, Drapery, the Market Square and Bridge St would benefit from additional protection.

**Questions 15 – 18 Historic Environment Strategy and Policy**

Paragraphs 126 and 157 of the National Planning Policy Framework (NPPF, 2012) indicate that 'local planning authorities should set out in their Local Plan a positive strategy for the conservation and enjoyment of the historic environment' and Local Plans should 'contain a clear strategy for enhancing the natural, built and historic environment'; paragraph 126 sets out the matters the LPA should take into account. Further, paragraph 9 indicates that 'pursuing sustainable development involves seeking positive improvements in the quality of the built, natural and historic environment'. Underlying the process of preparing a Local Plan, the LPA should seek to avoid harm to the historic environment and avoid significant adverse impacts when preparing a local plan (paras. 151 and 152).

**Q15 Is there a need for the Local Plan (Part 2) to include a locally specific policy to protect and enhance heritage in addition to the policies on the historic environment in the NPPF and the Joint Core Strategy?**

It is evident, therefore, that there is a good case for having a specific historic environment policy. In particular, it should set out definite proposals and policies for the implementation of Policy BN5 of the adopted West Northamptonshire Core Strategy 2014, as it applies to the town. The local policies should identify the important areas of local history (geographical and locally significant periods or subject matter) which warrant protection, as this is not included in the NPPF and JCS, and is not known by developers, e.g. its early history, which is reflected in the archaeological record/ scheduled sites etc, agricultural history, the history of the navigation of the River Nene, the development of shoemaking and associated industries, brewing, non-conformism etc. This will help to protect those remaining important elements which do not happen to be in a conservation area or listed, but contribute to the history and story of Northampton.

However, in developing a strategy for the historic environment, it is clear that other policy areas should include consideration of the issues relating to its conservation and enhancement, as set out in our responses to the other questions.

Finally, in identifying potential development sites, through the process of the Land Availability Assessment, full consideration of the potential harm to both designated and non-designated heritage assets and the need to avoid this, in line with the NPPF and Policy BN5 of the Core Strategy, is needed.

**Q16 Should the Council review the list of locally listed assets of historical importance?**

Yes, a review would be a good idea and also an ongoing plan for regular reviews to keep the list up to date, e.g. every 10 years a full review, every 5 years a smaller review. We also need a process where members of the public and interested groups can nominate a building or area to be added to the list. This will help to identify significant survivals of historic buildings from different periods, including those of the last century.

### Q17 Do you think there are locally important landscapes which should be identified in the Local Plan (Part 2)?

Within the town centre, 'townscapes' more than 'landscapes' are important, such as scale and grain of development, street patterns, e.g. Boot and Shoe Quarter with terraces and prominent corner buildings. It would also be helpful if planners and developers took account of topography and considered eye-lines.

Building on past landscape character studies, it would be good to identify locally important views, which may not have been identified previously, as well as other landscape features:

- views - e.g. any view of the lift-tower from a distance of 1 mile or more; the view to Delapre Woods from the top of Bridge St;
- routes and trackways, of historic value, amenity value and which are important routes through the town, e.g. the Roman path from town through the back of Delapre up to Hardingstone, known as 'Portway'; the walking and cycling route through Hunsbury to the lakes and Sixfields. When planners and developers understand how people move around and why they use each route (e.g. shortcut for journey to work, keeping fit, recreation), they will be in a better position to understand what development is appropriate for each area.
- distinctive architectural patterns e.g. the jetties. This is supported in the SA table p38 which notes that townscapes can be protected.

### Q18 How do we ensure new development preserves and enhances character and appearance and makes a positive contribution?

By recognising the important characteristics and distinctiveness of an area and requiring design that includes references to it – in a comprehensive way, in terms of urban design, layout and building styles and not just passing references. Where this is not possible or appropriate, new buildings should be distinctive on their own, contributing to the development of new architectural styles and the conservation areas of the future.

We need stronger policies for improving the streetscape, following the softening of the advertising controls. These should include street furniture and signage, shopfronts, road and paving materials, and guidelines on clutter.

Open spaces are important and the plan should explicitly encourage that they be built in to new developments, and protected, maintained and enhanced wherever they currently exist. However rather than a standard approach to all spaces, it needs to be appropriate to the character of the area. Hard landscaping can be more appropriate than planting in some very urban areas, such as the area of the Angel St development.

Where planting is used, it needs to be planned for year-round interest, wildlife habitat and long term sustainability. Instead of planters filled with summer bedding plants, which are thrown away after a short season, Northampton should use permanent, successional planting which attracts insects. Instead of mono-cultures of short-mown grass, it should sow mixes of long meadow grasses with wildflowers (which would also be cheaper to maintain).

### Central Area Action Plan

#### Question 27 - Improving the Retail Offer (Policy 13) – this policy needs to be updated due to changes in Government policy such as the extension of permitted development rights. Do secondary frontages still need to be identified?

In light of changing uses of town centres, we need to be more creative about mixing usages. There would be a case for secondary frontages preserving a mix of uses for healthy variety rather than specifically preserving retail use, e.g. at least 60% retail OR no more than 30% of ground floor frontage to be any single non-retail use class. There may be a case in the town centre conservation areas to review Article 4 Directions in the light of the extension of permitted development rights.

### Question 28 - Meeting Retail Capacity (Policy 14) – do we need a more up-to-date retail capacity study to ensure that this policy is up-to-date?

Possibly, but the proposed distribution of retail uses is even more problematic than capacity, e.g. the expansion of the Grosvenor Centre. It would be useful to undertake a series of studies of successful town centres, and to put the lessons learnt about their success into practice in Northampton.

### Question 30 – Do any of the site specific policies need updating? Please indicate which policies and provide details if possible (Policies 18-35).

Yes. Some of these sites have been affected by intervening redevelopment inconsistent with the CAAP policies, and the aims for others may no longer be relevant. The plans need to be revisited both as individual policies and for a co-ordinated plan for the town centre. E.g.

Policy 18 – Is retail an appropriate use for the library building? The character and uses of upper Abington St have changed significantly.

Policy 20 – St John's – student accommodation and a hotel have been provided, but in such a way as to preclude restaurants, cafés, active frontage, enhanced pedestrian routes and public space. There is no longer a potential public space area, as the new developments have enclosed and prevented public access. As a result this is now more of a service area and creative planning will be needed to turn this around.

Policy 21 Angel St – The new county council office development does provide offices, but again no public route through, and no significant public square. Again this needs to be re-planned if it is to become an attractive, well-used public area, given the developments under way.

Policy 28 Avon / Ransome Road /Nunns Mills – The University campus plans have changed this completely.

Policy 32 Drapery – significantly changed in character now that the bus 'station' has expanded along the length of it. This area needs remedial planning to help solve the problems of too many people queuing in too small a space and restricting pedestrian movement.

We also suggest that a masterplan is produced for the whole of the area bounded by the Grosvenor Centre, Sheep Street, The Mounts and Greyfriars, to unlock the potential of this area and revitalise Sheep Street, especially as it now seems unlikely that the Grosvenor Centre will be expanded.

### Question 31 Central Area Issues

The Committee proposes that there is an urgent need for a policy that commits to the regeneration and restoration of existing buildings in the town centre (such as through the establishment of a Townscape Heritage Initiative). Also, as a result of the deterioration in the quality of shop fronts and advertising, there is a good case for reviewing the town centre conservation areas Article 4 Directions, as indicated above (Q27). There is also a link here to the development of a retail strategy for the town centre that aspires to a higher class provision by encouraging the specialist and independent sector.

### Question 32 Do you have any comments on the Sustainability Appraisal Scoping Report?

#### Sustainability Appraisal

3.64 - the stated 'improvements' are debatable, e.g. the new bus station leaves many travellers standing out on the Drapery in all weathers, and the spread between stops makes changes between buses difficult for the infirm. It could therefore have discouraged public transport use. Reviews of each of these 'improvements' would be useful.

3.80 states there are 7 scheduled monuments, 3.81 says there are 8 scheduled ancient monuments. Which is the extra one?

#### Table 5.1 – Objectives and questions

1 Housing – the objectives should include a balance between different types of housing.

7 Character and vitality of town centre. We need to strengthen the 24hr economy not just the evening economy. The reference should be to a range of housing, not just 'housing'. The

objectives should include facilitating travel, and the desire to travel, into the town centre.  
9 Biodiversity – should include important green sites which support biodiversity but which do not have a designation, e.g. Billing Road Cemetery.  
11 Protect and enhance the historic environment. Generally good, but it should include the local list and non-designated assets, as required by the NPPF.

#### Table A2.1 Effects on objectives

1 Housing – the document states that all housing developments will have a positive effect, but whilst they will all have a positive effect on the amount of housing, they will not necessarily have an equally positive impact on the 'range' of housing, increased social housing and improved stock of housing. Therefore housing developments should be measured against these wider housing objectives.

10 Townscape and landscape and 11 Heritage. Contrary to the assessment's statement, we cannot assume that redeveloping a brownfield site will always be positive. The existing buildings or site may make a positive contribution to the character of the area, and the redevelopment may be inappropriate in character. Similarly we cannot assume that it will always be beneficial to redevelop a brownfield site in a built-up area (11) – the existing site may make a positive contribution, or may provide a much needed open space.

#### Q33 Do you have any comments on the Draft Statement of Community Involvement?

In order to encourage public involvement there needs to be a plain English summary of every document.