

From: [REDACTED]
Subject: Local Plan Options and Sustainability Appraisal consultation response
Date: 18 October 2016 16:09:07
Attachments: [Northampton LP and SA Oct 16.pdf](#)

Dear Ms Berry

Please find attached responses; please do not hesitate to contact me to discuss. I am very happy to arrange a meeting to discuss.

Kind regards,

Emilie

Emilie Carr | Historic Environment Planning Adviser |

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18 October 2016

Dear Sir or Madam

Northampton Local Plan (Part 2) Options Consultation Paper and Sustainability Appraisal Consultation

Thank you for consulting Historic England on the above 21 September 2016.

Northampton contains a wealth of heritage assets including those designated as scheduled monuments, listed buildings, registered battlefield and conservation areas. In addition to those of national importance all heritage assets contribute to local character and identity. The significance of these assets should therefore be understood, protected, and if appropriate better revealed. Historic character should be conserved and where possible, enhanced through the new Local Plan.

The Local Plan should apply a positive strategy to Northampton's historic environment, and the risks it faces, in a proportionate manner to the importance of those assets. An unusual degree of care will need to be taken in preparing policies that support and sustain the significance and character of the Borough's heritage, with clarity as to how development should conserve and enhance it.

You will of course also need to consult the County Historic Environment Record (HER) and County Archaeological Advisor and your Conservation Officer with regard to all heritage assets and get the benefit of their extensive expertise and local knowledge.

Notwithstanding the advice given in this letter, we must reserve the option at a later stage to comment further or object to any proposals that come forward as part of the Local Plan with the benefit of further information and consideration.

Historic England promotes a wide definition of the historic environment which includes not only those areas and buildings with statutory designated protection but also those which are locally valued and important, as well as the landscape and townscape components of the historic environment. The historic environment should therefore play a critical role in sustainable development at the heart of all spatial planning work, as reflected within the National Planning Policy Framework (NPPF).



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

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



Historic England has recently published advice notes on behalf of the heritage sector and we believe they will be of assistance in the preparation of your Local Plan. Specifically, Historic Environment Good Practice Advice Note 1: The Historic Environment in Local Plans and Historic Environment Good Practice Advice Note 3: The Setting of Heritage Assets is of particular relevance to you and provides additional information. These can be accessed via the following link:
<https://www.historicengland.org.uk/advice/planning/planning-system/>

Historic England has also recently published a document relating to site allocations in Local Plans – this covers all types of allocation and sets out a site selection methodology in relation to heritage assets. We consider this may be of use to you, and the document can be downloaded from:

<http://www.historicengland.org.uk/images-books/publications/historic-environment-and-site-allocations-in-local-plans/>

At this stage, without more specific information, it is difficult to provide a definitive response. Historic England is keen to be involved from an early stage of policy formulation; please do not hesitate to contact us to discuss or arrange a meeting.

Question 1

Do you have any comments on the vision for the Northampton Local Plan (Part 2)?

Heritage Assets are not specified within the vision, although reference to high quality design choices and distinctive historic character within the last paragraph is welcomed. In order to strengthen the vision and ensure a sound plan in accordance with the NPPF, reference to heritage assets, both designated and non-designated should be made.

Question 2

Do you think there are other objectives that should be included?

Objectives 8 and 9 are welcomed.

Question 3 – 10

Within the strategy section (pages 7 – 8) to ensure heritage assets are afforded appropriate consideration, the plan would be strengthened by the deletion of the word “also” from the second to last sentence of the ‘The Strategy’ on page 8, in accordance with paragraph 157 of the NPPF, to instead read:-

“The historic environment will ~~also~~ be central to shaping the Borough’s future. Heritage assets in all their forms will be promoted and enhanced in supporting the delivery of distinctive places.”

To strengthen ‘Providing new homes’, reference to heritage assets should be made.

Question 4

Do you agree with a residential density of 40 dwellings per hectare outside of the sustainable urban extensions, with higher densities in the town centre, other centres and along key transport corridors?



Providing that there is some level of flexibility where necessary, such as in relation to heritage assets and their settings.

Questions 11 – 14

No comments

Questions 15 – 17

It would be helpful if heritage assets were included in the explanatory text; they form a vital and central role within town centres and retail.

Questions 15 and 16

Do you agree that we should allow more flexibility in some smaller centres for other uses to be introduced?

Do you agree that we should review the secondary retail frontages policy, which restricts non-retail uses in some sections of frontage, to allow greater flexibility for non-retail uses in some areas?

This could be a sustainable method to allow continued use of smaller centres, however, it must be ensured that this flexibility conserves and enhances heritage assets and their settings. It is not possible to comprehensively comment without significantly greater detail, including proposals maps in relation to these questions. Article 4 directions may be necessary on specific frontages; safeguards will be necessary where heritage assets could be affected. How will the plan manage the changes as a result of this relaxation? What will happen to the buildings vacated?

Planning for Northampton's Growth

Without proposals maps, it is again not possible to comprehensively respond. Historic England would be very happy to advise from an early stage.

Detailed assessment will be required in relation to heritage assets for all potential areas of development. It is considered that substantial work is required in relation to heritage assets in order to determine the suitability of any proposed sites.

Historic England were recently consulted on a LAA site assessment methodology; we are very happy to advise and arrange a meeting as appropriate to ensure that heritage assets are robustly considered during the LAA process.

Development Management Policies

Inclusion of Heritage Assets is strongly welcomed. Together with Listed Buildings, Development within and in close proximity of Conservation Areas and Scheduled Ancient Monuments, policies relating to Battlefields and Non-designated heritage assets should also be included to ensure that heritage assets are comprehensively covered by the plan. That in relation to Conservation Areas would be more effectively titled "Development within and affecting the setting of Conservation Areas". Heritage Assets should be taken into account throughout the plan such as in relation to proposed policies on Retail Frontages, Shop Fronts and Advertising, Landscape, Tourism, Visitor and Cultural Development and Renewable Energy. Historic England would be happy to advise further in relation to policy wording.



Evidence Base

The evidence base is critical to the preparation of a Local Plan in accordance with paragraphs 169 and 10 of the NPPF. Reference to an evidence base is unclear and it would be helpful to make its location clearer. Particularly relevant to site allocations and designations could include the following:-

- Updating conservation area appraisals
- Undertaking characterisation studies
- Producing setting studies – of specific settlements, or specific heritage assets
- Local lists
- Assessments of landscape sensitivity

Sustainability Appraisal

Historic England have produced guidance entitled 'Strategic Environmental Assessment, Sustainability Appraisal and The Historic Environment' which it is considered will be helpful in this instance. Where we have made comment, further information can be found here:

<https://historicengland.org.uk/images-books/publications/strategic-environmental-assessment-sustainability-appraisal-historic-environment/>

The inclusion of a key sustainability issue in relation to heritage assets on page 8 is welcomed.

Objective 11 of Table 3.1 is welcomed. Within the sub questions reference should also be made to non-designated heritage assets. The third bullet point should also be amended to reference the designation of the battlefield as 'Registered' such as:-
“Protect, maintain, and enhance historic parks and gardens, and landscapes and the Registered Battlefield for the Battle of Northampton, and their settings?”

I note that no table is included for assumptions to be applied during the SA of site options (previously proposed as Table A2.1 in the earlier consultation regarding scoping). What criteria are to be used for site assessments, in order to ensure a sound plan? Please refer to my previous response on this issue; Historic England are happy to advise further.

It is noted that the Central Area Action Plan is not included in the current consultation; Historic England are very happy to continue to engage, please do not hesitate to contact me to discuss the contents of my letter of 09 June 2016.


Whilst it is understood that the Plan is at an early stage, a number of our comments call into question the strategy employed by the council.



I hope you find the above comments useful. Please do not hesitate to contact me if you wish to discuss any of these comments or arrange a meeting. We are happy to comment on site allocations and draft policies as they develop and provide further advice.

Yours sincerely



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