



Historic England

EAST MIDLANDS OFFICE

Ms Simone Wilding
The Planning Inspectorate
3D Eagle Wing
2 The Square
Bristol
BS1 6PN

Direct Dial: 01604 735460

Our ref: PL00045431

Your ref:TR050006

27 July 2018

Dear Ms Wilding

**Proposed Northampton Gateway Junction 15, Strategic Rail Freight Interchange
Section 55 Planning Act 2008**

Historic England was previously consulted on these proposals when they were submitted in the form of preliminary environmental information (PEI) in 2017. We responded to the applicant on the basis of the draft environmental statement (ES) and raised various concerns in our letter of 27 November 2018 with regard to the sufficiency of the information that was submitted.

We have previously stated that the proposed development is likely to result in considerable impacts, both visual and environmental that may affect the setting of heritage assets. We note however that the additional information that we requested does not appear to have been produced and included in the formal submission, and therefore we regret that we are unable to provide any further substantive comments specific to the proposed development at the present time.

Yours sincerely,



Neville Doe
Assistant Inspector of Historic Buildings and Areas
neville.doe@HistoricEngland.org.uk



2nd Floor, WINDSOR HOUSE, CLIFTONVILLE, NORTHAMPTON, NN1 5BE

Telephone 01604 735460
HistoricEngland.org.uk





Historic England

EAST MIDLANDS OFFICE

Northampton GatewaySRFI
PO Box 10570
735460
NOTTINGHAM
NG2 9RG

Direct Dial: 01604

Our Ref: PL00045431

27 November 2017

Dear Sir/Madam

**Proposed Northampton Gateway Junction 15, Strategic Rail Freight Interchange
Section 42 Planning Act 2008
Preliminary Environmental Information**

The proposals currently submitted in the form of preliminary environmental information (PEI) comprise the construction of a rail freight terminal to be located at land south of Collingtree; and a bypass road to the west to take traffic off the section of the A508 that currently passes through Roade. The associated infrastructure comprises a freight terminal to accommodate up to 16 trains a day, with container storage and HGV parking; up to 468, 324 square metres of warehousing; new rail line connecting the terminal to the Northampton loopline of the West coast mainline; new site access on the 508; remodelling of junction 15 of the M1 motorway; earthworks and landscaping to create level site and landscaped bunding to contain and screen the proposed development.

Summary

Historic England has given careful consideration to the draft environmental statement (ES) submitted, with specific reference to the comments we have made previously to you during pre-application discussion regarding the proposed development. At the present time we are not convinced that all of our previous advice has been taken into account. As a result **we do not consider that sufficient information has as yet been submitted to provide a clear understanding of the nature and full extent of the potential impacts on the historic environment as required either by the EIA regulations, National Planning Statements or the National Planning Policy Framework.**

We have set out below advice regarding the additional information which we consider it will be essential for you to supply to enable the Examining Authority to come to an informed view of the project. Notwithstanding this need for further information it is already evident to us that the proposed development will have a significant environmental impact in EIA terms on the historic environment and that it will cause harmful impacts on a number of designated heritage assets.

In our view proportional and refined information is necessary to address these



2nd Floor, WINDSOR HOUSE, CLIFTONVILLE, NORTHAMPTON, NN1 5BE

Telephone 01604 735460
HistoricEngland.org.uk



substantial impacts upon designated heritage assets in their landscape setting. The level of carefully considered information that in our view is required is proportional to the severity of the issues we have identified in relation to the proposed scheme, and directly related to the need to assess the overall sustainability of the development.

Historic England Advice

At the PEI stage our advice focuses upon how the draft environmental statement (ES) approaches the possible effects of development on the historic environment, particularly designated heritage assets. We will provide you with advice on whether the draft ES provides all the information reasonably required to both assess the environmental effects of the development under the Environmental Impact Assessment (EIA) regulations and enable the consultees and ultimately the Examining Authority to develop an informed view of the scheme.

General Advice

In general terms, Historic England advises that a number of considerations need to be taken into account when proposals of this nature are being assessed. This includes consideration of the impact of all ancillary infrastructure and development, including overhead cabling and gantries as well as the freight terminal and by-pass road:

- The potential impact upon the landscape, especially if a site falls within an area of historic landscape;
- Direct impacts on historic/archaeological fabric (buildings, sites or areas), whether statutorily protected or not. All grades of listed buildings should be identified;
- Other impacts, particularly the *setting* of listed buildings, scheduled monuments, registered parks and gardens, conservation areas etc, including long views and any specific designed views and vistas within historic designed landscapes. In some cases, intervisibility between historic sites may be a significant issue;
- The potential for buried archaeological remains;
- Effects on landscape amenity from public and private land;
- Cumulative impacts

In Historic England's view, the draft ES does not adequately address all of the above considerations, and we have specific concerns which we detail below.

We note the inclusion of the updated Built Heritage Statement (BHS) and LVIA. We also note that the LVIA states that the assessment has been informed by a computer generated Zone of Theoretical Visibility (ZTV) refined through field evaluation. However no maps appear to be included to illustrate this. We recommend this information is also submitted in order to support other documents and enable a clear understanding of the approach and reasoning behind the assessment(s). The ZTV is a



2nd Floor, WINDSOR HOUSE, CLIFTONVILLE, NORTHAMPTON, NN1 5BE

Telephone 01604 735460
HistoricEngland.org.uk



key piece of baseline information which has specific relevance to assessing the extent of the study area within which designated heritage assets might experience visual effects from the proposed scheme. Without this it will not be possible to assess whether the 1km study area defined in Chapter 10 of the ES is appropriate.

Environmental Effects of the Development

We note that the BHS mainly concentrates its assessment on visual impacts. In truth this is only one aspect in which the proposed development would impact upon the historic environment and heritage assets. In addition the effects of noise, light emissions and the fallout from general movement and activity associated with the site once it is operational, have the potential to compound the overall impact at particular times throughout the day, and should also form part of the heritage assessment. While we note that the ES contains section that consider specific environmental effects such as noise and light, and that the BHS makes some brief references to increased noise in relation to heritage assets, we recommend that a more detailed and in depth consideration and assessment of all other environmental effects including noise, vibration and light emission is included as part of the heritage impact assessment. In particular this should include information/modelling to demonstrate the visual effect of light levels and how this would be experienced in terms of views from, and appreciation of, heritage assets and their settings, and to assess how effectively the bunding, landscaping and tree-screening might mitigate the impact.

While these documents on the whole provide some useful information and a certain level of assessment, they read very much as 'stand-alone' documents. Although there are some references to the historic environment in the LVIA there does not appear to be the close relationship between the two as we recommended in our pre-application letter of 18th November 2016. While we note and generally concur with the findings and some of the conclusions in the BHS, no photomontages have been included that are specific to the assessment of impact upon the historic environment or individual heritage assets, despite references being made in the text to the level of visibility of such. Regardless of whether those impacts are likely to be harmful or benign, we would expect to see such material to aid a clear understanding of any impact, and to substantiate the claims and assertions that have been made in the application. This again is in accordance with our previous advice. We detail below, specific instances that we have identified, where the impact has not been fully demonstrated. Of the photographic material that has been submitted, we note that only a very limited number of them actually includes the proposed development as built and after mitigation measure have been established. Most of the other images show existing viewpoints only, albeit with the developments location indicated notionally. Such a limited selection of visual material does not provide us with sufficient information to assess the impact upon heritage assets.

In particular we would wish to see additional photomontages for the following views:



2nd Floor, WINDSOR HOUSE, CLIFTONVILLE, NORTHAMPTON, NN1 5BE

Telephone 01604 735460
HistoricEngland.org.uk





View point number 8 (north-east edge of Blisworth Conservation Area) in order to assess the full visual effect and the effectiveness of mitigation from this elevated view point above the site ; Viewpoint 15 (edge of Milton Maser conservation area); We also specify other views that we would like to see, under specific assets discussed below.

The NPPF and the Good Practice in Planning Advice Notes were all published after the Design Manual for Roads and Bridges (DMRB (2007) therefore we consider that approaches have moved on subsequent to its publication. The matrices often produced when working with a DMRB based methodology in our view provide little useful contribution to the assessment of heritage impacts and tend to confuse concepts of the significance, sensitivity and magnitude of impact whilst atomising complex relationships between individual features and apparent impacts. A matrix methodology such as this can result in inappropriate downgrading of impacts of high magnitude on assets of comparatively lower significance. Whilst we appreciate that this methodology is commonly employed we tend to advocate a more narrative approach in line with the published advice referenced above and below as adopted within the CgMs report in Appendix 10.

Historic Environment Good Practice Advice in Planning Note 3: The Setting of Heritage Assets (Historic England, 2015): <https://historicengland.org.uk/images-books/publications/gpa3-setting-of-heritage-assets/>

We would also recommend that the Good Practice Advice Note (2) on Managing Significance in Decision Taking in the Historic Environment is also consulted by the applicant in producing the Environmental Impact Assessment:

[<https://historicengland.org.uk/images-books/publications/gpa2-managing-significance-in-decision-taking/>](https://historicengland.org.uk/images-books/publications/gpa2-managing-significance-in-decision-taking/).

We are concerned that so little evidence of archaeological evaluation on site appears to have been conducted to meet the requirements of both the NPPF and EIA Regulations. It is essential that an appropriate amount of work is carried out to inform the Examining Authority's assessment of the proposed scheme on this aspect of the environment. You will need to follow the advice already provided by the County Archaeological Advisor in relation to these matters.

Designated Heritage Assets - Significance & Impact

Courteenhall Registered Park and Garden

The registered park and garden of Courteenhall is listed at Grade II. It was designed by Repton in the 1790s, as landscaped parkland to the principal building, namely Courteenhall, a country house built c.1795 by Samuel Saxon, which is listed at Grade II*. The stables are also listed at Grade II* and together they have group value. The grounds cover an area of approximately 150 ha, and comprises a landscaped main driveway to the house; formal gardens which dates from the 1930s having replaced a Victoria parterre; parkland that is densely planted with ornamental trees; grasslands and pasture; and a kitchen garden. The application site lies immediately to the north-



west corner of the registered park.

Notwithstanding that Courteenhall and its main buildings are located roughly centrally within the estate, and generally face away from, and are screened from the development site by substantial tree belts, that part closest to the site reads as an attractive wooded parkland area, within a wider arable setting of open fields, hedgerows and trees .

The proposed development would constitute considerable physical interventions within the landscape, described in the BHS as “*a more urbanised environment*”. We believe that this level of change is therefore likely to have a negative impact upon the character and appearance of the wider setting of the registered park. While we note the conclusion of the statement that there will be a “*minor degree of harm*” we also note that there is no visual material - (eg. Photomontages) to demonstrate the level of visual impact. We would therefore wish to see additional views/photomontages to demonstrate the views and effect of the development from the highest point within Courteenhall Park where the hall is located, and where we have not had access; some assessment of views from the upper floors of the hall, which takes into account the seasonal nature of tree cover; and a photomontage that demonstrates the experience/views of the development as it is approached from the perimeter road along the north side of the park.

Also, the way that the visual transition between the park and the site is managed will be crucial in order to ensure that any impacts are ameliorated in the most effective way possible, and therefore it would also be useful to have detailed information, regarding the approach to the proposed mitigation measures, including visual material to fully appreciate how this might work. We note that the proposed bund at the extreme south-eastern corner of the site opposite the park appears to be screening an open field rather than the actual proposed development. We question why this is necessary and whether line of the bund could be amended to return adjacent the south elevation of the terminal building. In addition we would query whether alternative forms of mitigation screening might be more appropriate within the context of the character of Courteenhall and its setting as described above.

Road Aqueduct

The Roade aqueduct was built by Robert Stephenson in 1837 to carry water over Roade Cutting. It is significant as one of the most ambitious works on the London to Birmingham railway, and is a monument to Britain’s place as an early world leader amongst industrialised nations at the time. The aqueduct is listed at Grade II. It’s current setting comprises the deep railway cutting and railway tracks below, and is generally isolated from any later development and can be viewed from a bridge further south down the railway line.



2nd Floor, WINDSOR HOUSE, CLIFTONVILLE, NORTHAMPTON, NN1 5BE

Telephone 01604 735460
HistoricEngland.org.uk





The proposed by-pass road will cross the railway to the south of the aqueduct, and in front of (north side) the pedestrian bridge from which it can currently be viewed. We note that the BHS acknowledges that there will be an impact that would result in a minor degree of harm. No details are provided of the design/appearance of the proposed bypass road bridge, nor any photomontages to demonstrate the impact upon the aqueduct. We therefore recommend that this material is submitted and that you consult further with the local authority's specialist conservation area in relation to those information requirements.

Planning Policy Context

Historic England's pre-application advice above is provided in line with planning legislation (1990 & 2008 Act), Government policy and guidance contained within the National Policy Statements on infrastructure developments, National Planning Policy Framework (NPPF), Planning Policy Guidance (PPG), and our own published advice documents including The Historic Environment Good Practice Advice in Planning Notes (GPAs).

We refer you to the policies and guidance which cover the information submission requirements and methods of assessment to ensure that the determining authority is provided with sufficient information on which to base their examination and decision-making process.

The *National Planning Policy Framework* states that it is essential that a planning application contains an adequate assessment of the significance of heritage assets and the contribution of their setting to that significance. The level of detail should be proportionate to the assets' importance and no more than is sufficient to understand the potential impact of the proposal on their significance. As a minimum the relevant historic environment record should have been consulted and the heritage assets assessed using appropriate expertise where necessary. Where a site on which development is proposed includes or has the potential to include heritage assets with archaeological interest, local planning authorities should require developers to submit an appropriate desk-based assessment and, where necessary, a field evaluation [NPPF 128]. Significance is important in decision-taking because heritage assets may be affected either by direct physical change or by change in their setting. Being able to properly assess the nature, extent and importance of the significance of a heritage asset, and the contribution of its setting, is very important to understanding the potential impact and acceptability of development proposals [PPG 18a-009-20140306].

The Examining Authority must be able to identify and assess the particular significance of any heritage asset that may be affected by a proposal (including by development affecting its setting) and should take this assessment into account when considering impact in order to minimise conflict between a heritage asset's conservation and any





aspect of the proposal [NPPF 129].

The *Historic Environment Good Practice Advice in Planning Note on The Setting of Heritage Assets* emphasises that the information required in support of applications for planning permission should be no more than is necessary to reach an informed decision, and that activities to conserve or invest need to be proportionate to the significance of the heritage assets affected and the impact on the significance of those heritage assets. At the same time those taking decisions need enough information to understand the issues [GPA 3:2]. Significance [of a heritage asset] can be harmed or lost through...development within its setting [NPPF 132].

Historic England Position and Recommendation for Next Steps

From the information that has so far been submitted, it is clear that the proposed development scheme will constitute a substantial industrialisation of the existing agricultural landscape that will result in a significant widespread transformation of the existing landscape and geographical character. We therefore reiterate our position that further information and assessment is required in order to fully demonstrate the substantial impacts of the proposed rail freight terminal and the other associated works upon designated heritage assets in their shared landscape setting.

We recommend that you consider comments and observations that we have provided above in alignment with all the other historic environment consultees and consider what additional information and revisions should be submitted in order to address the issues and concerns that we have raised.

Yours Sincerely



Neville Doe
Assistant Inspector of Historic Buildings and Areas
E-mail: neville.doe@HistoricEngland.org.uk

cc: Lesley-Ann Mather - Northamptonshire County Council

