

**From:** Lesley-Ann Mather [<mailto:LMather@northamptonshire.gov.uk>]  
**Sent:** 27 September 2018 08:23  
**To:** Northampton Gateway  
**Subject:** TRO50006- Cultural Heritage Advice

Dear Ms Wilding

I act as archaeological advisor to both Northamptonshire County Council and South Northamptonshire District Council.

I have noted from your website that the period to register to make a Relevant Representation has passed. I previously provided a Scoping Opinion to PINS on the 22<sup>nd</sup> November 2016 and I am therefore surprised that I have not received any consultation information or documents from PINS.

I have been dealing with the Cultural Heritage issues with the applicant and their consultant for a number of years. I have provided comprehensive comments to them in my response to the Stage 2 consultation, 21<sup>st</sup> November 2017. In early 2018 I have been in dialogue with their archaeological consultants CgMs

I was alerted that things had moved on only when I was asked to comment on the archaeological evaluation report which the applicant's archaeological consultant, Mr R Smalley, CgMs took some time to send to me and latterly the request to comment on a SOCG sent on the 9<sup>th</sup> August after the closing date for representation registration.

The applicant has only undertaken a limited amount of intrusive archaeological assessment within the proposed development area. In my professional opinion the Cultural Heritage assessment in relation to below ground archaeological assessment is inadequate and does not follow the EIA regulations nor the guidance provided within the NPPF. I have included the paragraph below from your own guidance to demonstrate that the applicant has been deficient in their submission.

*The Nationally Significant Infrastructure Projects website contains a number of advice notes for applicants of relevance is Advice Note Seven EIA- Preliminary Environmental Information: Informal Screening and Scoping this highlights that "The ES must as a minimum comply with Schedule 4 Part 2 of the EIA Regulations". It also encourages applicants "to invest time and effort in both formal and informal EIA consultation exercises. This should include allowing time to respond to comments from consultees including, if necessary, undertaking additional surveys and analysis."*

The applicant's consultant indicates in the draft SOCG that the scope of the minimal trial trench evaluation as detailed within the submitted evaluation report by Cotswold Archaeology was approved by NCC. I would however highlight that this was always caveated as not an acceptance of the proposals merely a way to progress the assessment in the hope that the applicant would undertake the outstanding works in order to provide information on the presence, extent, preservation and significance of any archaeological deposits. The results from the outstanding trenching would provide information on which to make an informed assessment of the impact on the historic environment and also allow the formulation of an informed mitigation strategy which may involve preservation in situ. I therefore disagree with the applicant's proposal to undertake further archaeological assessment after consent has been given. This is especially so bearing in mind the nature of the project in which redesign is difficult should any significant archaeological activity be identified that would warrant preservation in situ. I dealt with the DIRFT interchange and as such I understand the constraints of such a project.

In light of the issues I have raised above which I can provide a more detailed response if required I am concerned that without my representation the outstanding issues regarding cultural heritage will not be adequately discussed. In my experience with other infrastructure projects, the Inspectorate place an emphasis on early dialogue and discussions between the applicant and the consultees. They also prefer the assessment process to be front loaded; i.e. the archaeological assessment information to be provided as part of the submission

I understand that I have missed the deadline however I understand from your guidance notes that it is still possible to participate in the Examination at the Examining Authority's discretion.

Regards

Lesley-Ann

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From the 1<sup>st</sup> April 2017 we will be charging for archaeological advice. Please note that a revised charging schedule comes in from the 1<sup>st</sup> October 2017. Further details can be obtained from the Planning Services website.

<http://www3.northamptonshire.gov.uk/councilservices/environment-and-planning/planning/planning-policy/archaeology-biodiversity-and-landscape/Documents/Archaeology%20Charging%20Schedule%20for%20Website%20Dec16.pdf>  
<http://www3.northamptonshire.gov.uk/councilservices/environment-and-planning/planning/planning-policy/archaeology-biodiversity-and-landscape/Documents/Archaeology.Charging%20Schedule.%20Aug17.pdf>

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