



Historic England

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By email: forward.planning@barnet.gov.uk

Dear Nick,

Re: Main Modifications to the Barnet Local Plan consultation

Thank you for consulting Historic England (HE) on the Barnet's Local Plan Main Modifications (MM). As the Government's adviser on the historic environment HE is keen to ensure that the protection of the historic environment is fully taken into account at all stages and levels of the planning process.

Comments below notwithstanding, we are broadly supportive of the MMs relating directly, and indirectly, to the historic environment, recognising that they seek to clarify and strengthen its sustainable management. The added emphasis on a design-led approach to development is particularly beneficial given that the London Plan policy D3 (11) and its guidance¹ both require consideration of the historic environment. The introduction of a design review panel (Para. 6.2.2a) and the consideration of design codes (para. 2.2.1c and 6.4.1) is also welcome.

However, the implementation of some of the MMs is such that we consider them to be inconsistent with the NPPF and London Plan, unclear and ambiguous and/ or to run counter to the delivery of a positive strategy for the historic environment. As such, there are areas where we consider that the plan remains unsound. In line with the requirements of the MM representation forms, we have set out these concerns clearly stating which MM they relate to and explaining why we consider it to be unsound. Recommendations for ensuring soundness are then provided. Please note that a small number of points of accuracy have also been raised so that they might be addressed as additional modifications. These are clearly delineated from the main modifications.

Policy CDH02: Sustainable and Inclusive Design (MM 44 - soundness)

¹ Optimising Site Capacity: A Design-led Approach (2023).



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Paragraph 6.13.4 has been modified and now states that ‘*measures must be considered having regard to potential impacts on the significance of a designated heritage asset (see policy CDH08).*’ We advise that this is amended to ‘*the significance of a heritage asset*’ because national and regional policy requires that impacts to both designated and non-designated assets are considered.

Policy CDH04: Tall Buildings (MM 46 - soundness)

As stated in our Advice Note², tall building development by its nature can have transformational impacts upon a place. While this can be achieved without harm to heritage, they represent one of the biggest risks to the significance of London’s Historic Environment and the benefits derived from it. We therefore welcome the removal of the policy relating to very tall buildings and support the reasons for doing so. We also welcome the actioning of our feedback regarding the mapping of the potential suitable locations for tall buildings in line with the requirements of London Plan policy D9.B(2).

The modification of the former part E of CDH04 has resulted in the removal (at CDH04.Eiii) of the explicit requirement that proposals should consider the historic environment. We consider this text to be an important part of ensuring that there is a positive strategy for the management of the historic environment, in accordance with NPPF paragraph 196 and advise that it is reinstated. We would also recommend that the modified part B of this policy is amended to explicitly include the historic environment, to align with policy D9.C(d-e) of the London Plan, which clearly states that it is an environmental impact that must be considered. We would also query whether the modification of CDH08.B could include an explicit requirement that all tall building proposals (even for sites where tall buildings may be appropriate) are accompanied by evidence showing that alternative building typologies and configurations had been tested. This would give greater weight to the requirement of D9.D, regarding that harm to heritage significance is justified ‘*demonstrating that alternatives have been explored*’,³ and also be beneficial in terms of delivering a positive strategy for the historic environment (NPPF para. 200).

Paragraph 6.18.3 has been modified to explain that proposals for tall building development outside the locations identified in Part A will be considered against the development management considerations contained in parts B and C (as modified). Whilst we understand that tall building proposals outside of identified zones cannot be decided in a vacuum, we consider this modification to conflict with the requirements of London Plan policy D9.B(3) in positively managing the location of tall buildings, and indirectly the historic environment (as per NPPF para. 196). Given that most of Barnet is defined by two to three storey buildings, then buildings of eight or more storeys will not be in keeping with the character of the area, nor the London Plan’s design-led requirements. There is also likely to be an increased risk of adverse

² <https://historicengland.org.uk/images-books/publications/tall-buildings-advice-note-4/>

³ A point that it is also required within the Optimising Site Capacity: A Design-Led Approach guidance, para.3.3.4



impacts under section C of the London Plan's D9 Tall building policy, and section D of Hillingdon's own tall building policy. We therefore advise that the modification at 6.18.3 is qualified with a preceding statement explaining why other locations are not appropriate for tall buildings and that speculative tall development will generally be resisted.

Later in paragraph 6.18.3, we suggest that the 'to minimise' modification is changed to 'avoid and minimise' in line with the NPPF (para. 201) and London Plan (HC1.C). Also, whilst we welcome the paragraph's retained reference to HE's Tall Building Guidance, the modification before it means that it now lacks context. Explaining that the guidance should be used in relation to considering impacts on the historic environment would add clarity to this section of the explanatory text. Alternatively, the reference would fit well as an addition to the modification of paragraph 6.18.6, which discusses the SPD on Designing for Density and planning framework guidance.

Policy CDH06: Basements and below ground development (MM 49 - soundness)

The final part of policy CDH06 has been modified to read: '*Basement and below ground development will be considered with regard to the relevant requirements of Local Plan policies CDH01, CDH07, ECC01, and ECC02.*' However, archaeological remains are also a relevant consideration, and we therefore advise that this is amended to include policy CDH08 to conserve these assets in accordance with NPPF (Chapter 16) and the London Plan (HC1.C). We would also query if there is capacity within the modifications in the explanatory text to highlight that the Greater London Archaeological Advisory Service (GLAAS) should be consulted where basements, or other below ground development, is proposed within Archaeological Priority Areas (APA).

Policy CDH08: Barnet's Heritage (MM 51 – soundness)

Duplication of the NPPF

We welcome the actioning of our previous comments in the removal of the second paragraph of the policy and broadly support the MM aim of redrafting of CDH08 to better align with the NPPF. However, we remain concerned by the level of repetition of the NPPF and the fact that for each different category of heritage asset the NPPF is summarised in a slightly different way, with slightly different emphasis (which sometimes appears more concerned on justifying harm rather than conserving and enhancing significance).

More accurate and succinct translation of the NPPF would improve both the positivity and clarity of the policy/explanatory text. We therefore advise summarising the key points of the NPPF policies for designated and non-designated heritage assets once in full, rather than



repeating what are essentially the same NPPF requirements for each individual asset type.⁴ If the policy is subdivided into separate designated and non-designated heritage asset (NDHA) sections, the local policies for each type of asset could follow on in each relevant section.⁵ So that the policy is not in any way unclear or ambiguous, it would be advisable to explain in the explanatory text which asset types have no additional local policy requirements; otherwise, it may look like they have been accidentally overlooked.

Heritage Impact Assessments

We support that the MM seeks to set out clear procedures for considering the potential impact of a proposed development on the significance of heritage assets and, in light of the MM objective to better align with the NPPF, we would highlight that paragraph 200 requires that proposals affecting the significance of heritage assets are accompanied by a proportionate Statement of Heritage Significance, with proposals affecting archaeological assets requiring a full desk-based assessment and, where necessary, a field evaluation. Additionally, the London Plan policy D9.C(d) proposals should take account of, and avoid harm, to the significance of London's heritage assets and their settings. Policy HC1.C then also requires that cumulative impacts are actively managed, and that heritage is considered early in the design process. A policy requirement for proposals affecting heritage assets to be accompanied by a heritage impact assessment that considers cumulative effects would effectively deliver on all these policy requirements.⁶

CDH08A-B: Conservation Areas and Statutory Listed Buildings

We appreciate that this policy, and the Listed Building policy at CDH08.B, have been modified to reference the requirements of the Planning (Listed Buildings and Conservation Areas) Act 1990. However, the way in which this has been done introduces a discrepancy in the policy terminology as the 1990 Act focuses on '*character and appearance*' and '*special architectural/historical*' interest, while the NPPF and London Plan take a singular and more holistic '*significance*' based approach to managing the historic environment. As such, we do not consider these modified policies to be clearly written and unambiguous; nor to align properly with the NPPF or London Plan. To rectify this, we recommend that the references to legislation are limited to: '*In exercising the Council's duties set out in section 72(1) of the Planning*

⁴ Please note that normally Historic England encourages policies for each category of heritage asset, but this is only beneficial where the policies go beyond the NPPF in setting out local requirements (e.g. CDH08 A(c), (d) and (e); CDH08D and the part of CDH08 F relating to the Greater London Archaeological Advisory Service). Otherwise, it is just unnecessary duplication which should be avoided (NPPF para. 16 (f)).

⁵ e.g. policies CDH08.A(c-e) would be retained under a conservation area sub-heading within the designated assets section and the part of CDH08.F relating to Greater London Archaeological Advisory Service (GLAAS) would be retained under a sub-heading of Archaeological Remains within the NDHA section.

⁶ I.e. an assessment that describes the asset, its significance (including any contribution made by setting), the change a proposal will have on that significance, how that change is to be avoided and minimised, and any opportunities for enhancement. Please note that the Greater London Authority is currently preparing a Heritage Impact Assessment Practice Note that sets out good practice for undertaking such assessments within Greater London. It will be published later this year and should be used within the hierarchy of existing historic environment assessment guidance.



(Listed Buildings and Conservation Areas) Act 1990...’ and that thereafter the policy sticks to the requirements of the NPPF/London Plan using their terminology.

Policy CDH08.A(c) and (e) are further examples of where the duplication of legislative and policy terminology has resulted in ambiguity, as they now refer to both the ‘*character or appearance or significance*’ of conservation areas. However, the two are not mutually exclusive: the character/appearance that conservation area designations seek to preserve/enhance is that which is derived from, or illustrates, the areas heritage significance (i.e. its special architectural or historic interest). Again, as neither the NPPF nor London Plan employ the legislative terminology we advise that only significance is referred to throughout both the policy and supporting text. For consistency, the reference to ‘*character and appearance*’ in paragraph 6.25.1 should also be replaced with significance.

Please note that if the alignment with the NPPF is actioned in the manner suggested in the section above, it may more appropriate for the 1990 Act to be discussed in the explanatory text where it can be made clear that the legislation sets out objectives fulfilled by the NPPF (paras. 205 – 208).

We welcome the specific criteria set out in CDH08.A(c-e) and would suggest – as an additional modification – that building hierarchy could be added to the list of considerations given under CDH08.A(d).

CDH08.E: Local Heritage Assets

We note that the first paragraph of policy CDH08 has been modified to indicate that NDHAs in Barnet are referred to as ‘local heritage assets’. However, not all references to NDHAs have been changed and both terms are used interchangeably throughout; creating a consistency issue throughout CDH08 and its supporting text (particularly paragraph 6.32.1 – 6.32.2). Additionally, it is not clear if the term ‘local heritage asset’ is being used to refer specifically to locally listed heritage assets (LLHAs). If it is, that is problematic because, whilst all LLHAs are NDHAs, not all NDHAs are necessarily locally listed. To ensure that the policy is clear and unambiguous, we recommend that the term NDHA is retained throughout, unless specifically referring to heritage assets on the local list. This will also ensure that CDH08 is consistent with the terminology of national and regional policy.

The modified structure of CDH08.E and CDH08.F would benefit from being be revisited and clarified because NDHAs include archaeological assets (meaning that the archaeology policy should be a subsection of CDH08.E (e.g. CDH08.Eii)).

CDH08.F: Archaeology





We welcome the modification at the start of CDH08.F, which in line with the NPPF (para. 200), now requires that an archaeological desk-based assessment (DBAs) and, where necessary,⁷ field evaluation will be required where development proposals affect sites of potential archaeological interest. However, to ensure that the ‘where necessary’ requirement is clear and unambiguous we would advise expanding the modification to explain that Archaeological Priority Areas are areas where there is significant known archaeological interest, or the potential for new discoveries and that, as such, they indicate where development might affect archaeological assets and where archaeological DBAs and evaluations are likely to be required.⁸

As an additional modification, we would advise highlighting in the explanatory text (e.g. the end of para. 6.23.2) that the APAs are due to be updated c.2026 and will thereafter be tiered according to their importance, would help demonstrate that the council’s is setting out a positive strategy for the historic environment in line with NPPF para 200 and fulfilling the requirements of HC1.A of the London in developing evidence to identify, understand, conserve, and enhance the historic environment.

The modification of CDH08.F requiring applicants to consult with the Greater London Archaeological Advisory Services (GLAAS) is welcome. However, CDH08.F now also states that the Hendon and District Archaeological Society (HADAS) are to be consulted ‘*where relevant*’. We consider this to be unclear and ambiguous; and advise that it is qualified (e.g. made optional, mandatory, on certain size projects, etc.).⁹

As an additional modification, we also recommend clarifying that GLAAS represent the local authority on archaeological planning matters and should be consulted in line with the following criteria:

- All major planning applications over 0.5 hectares whether in an APA or not.
- All Environmental Impact Assessment Scoping requests and Environmental Statements.
- Any application supported by an archaeological desk-based assessment.
- Minor planning applications (e.g. Site area less than 0.5 hectares and new basements) in any APA (tiers 1 to 3).
- Domestic basement applications in APA tiers 1 and 2 only. Note: For boroughs as yet without APA tiers consult GLAAS on any domestic basement in an APA.
- Householder and equivalent-scale very minor applications in APA tier 1 only. Note: For boroughs as yet without APA tiers do not consult GLAAS on householder or equivalent applications unless within 50m of a scheduled monument.
- Proposed substantial demolition or major alterations to historic buildings.

⁷ Field evaluations determine the nature of archaeological resource within an area

⁸ We recommend that as a requirement of validation all major applications (e.g. Site area 0.5 to 2 hectares) within Archaeological Priority Areas (tiers 1-3) are expected to submit an archaeological desk-based assessment to accompany the planning application. See our [Charter for the Greater London Archaeological Advisory Service](#) (2019).

⁹ We suggest liaising with HADAS to determine the most appropriate qualification.





- Submission of details in relation to archaeological conditions.
- Appeals on applications for which an archaeological issue has previously been identified.

Meanwhile, consultation with HADAS should always be in addition to consultation with GLAAS as they are a voluntary organisation without the same capacity or professional expertise. Because of this, it should be made clear that HADAS are not obliged to respond to consultations and, do so, at their own discretion.

Scheduled Monuments (additional modification)

The modification of the 'Archaeology' section (CDH08.F) means that there are now no local policies for scheduled monuments. For consistency, scheduled monuments should either be discussed separately alongside the other designated heritage assets, or it should be stated that there are no additional policies set out in relation to scheduled monuments (beyond those in the NPPF).

Heritage at Risk

The Heritage at Risk policy has been deleted and we see no rationale for this within the Inspectors comments. Therefore, to ensure that heritage at risk is being managed positively, and that the requirements of the London Plan's HC1.E regarding heritage at risk are at least suggested to be met, we would request that the policy for such assets is reinstated.

CDH08: Explanatory text

We recommend that the modification at paragraph 6.23.3 is amended to read: '*In determining applications for planning permission that affect **the significance of heritage assets, including any contribution by made setting,**...*'. This would ensure consistency with the NPPF (para. 200) and London Plan (HC1).

Paragraph 6.32, which discusses the local heritage list, has been modified. The recognition that local locally listed assets can include a range of assets, not just buildings, is welcome and accords with national policy,¹⁰ as well as [HE's Local Heritage Listing guidance](#). However, we note that the modification continues to explain that local heritage assets will be identified '*by applying the adopted criteria for the selection of local heritage assets as found on the council's website.*' In principle, this is correct. However, the criteria referred to¹¹ do not fully reflect the NPPF's concept of heritage significance and only effectively apply to built heritage assets. We therefore advise that the modification acknowledge that the Barnet local heritage list, and the criteria used for identifying such assets, needs reviewing; and that a commitment is provided

¹⁰ Locally listed heritage assets are NDHAs which are defined in the Planning Policy Guidance as: '*... buildings, monuments, sites, places, areas or landscapes identified by plan-making bodies as having a degree of heritage significance meriting consideration in planning decisions but which do not meet the criteria for designated heritage assets.*' Paragraph: 039 Reference ID: 18a-039-20190723

¹¹ <https://www.barnet.gov.uk/planning-and-building-control/conservation-and-heritage/locally-listed-buildings> [accessed 12.06.2024]





to undertaking a review in line with HE's Local Heritage Listing guidance. This modification would ensure consistency with the NPPF (para. 35) and demonstrate that the council is setting out a positive strategy for its non-designated heritage assets (NPPF para. 196).

Paragraph 6.33.1 has been modified so that it now states that HE and GLAAS will be consulted for proposals affecting APAs. However, GLAAS is part of HE and the only department that require consulting in relation to APAs, unless the proposal affects a scheduled monument.¹² We would also highlight that, whilst GLAAS may hold further information on the archaeological sites in Barnet (e.g. on active investigations), it is the [Greater London Historic Environment Record](#) (GLHER)¹³ that is the major resource for the understanding of the historic environment (not just archaeology) of Greater London. We recommend that these additional modifications are made to ensure that the Local Plan is accurate.

ECC01: Mitigating Climate Change (MM 64 – additional modifications)

We note that policy ECC01.H, which refers to the retrofit of heritage assets, has been modified. Broadly, we are content with the modification; but we would highlight that improved energy performance or generation should not be at the expense of the overall carbon efficiency.

The addition of paragraph 10.6.3A, which seeks to set out the carbon reduction aims for heritage assets within the explanatory text, is welcome. However, for the purposes of clarity, we would advise that it is historic buildings of traditional construction (i.e. pre-1919 buildings) that typically require more considered retrofit responses because they are built differently to modern buildings and are designed to 'breathe'.¹⁴ We would also recommend that maintenance should always be considered before undertaking retrofit works and therefore condition surveys can be a useful first step in developing proposals to improve the energy and carbon efficiency of heritage assets. Adding a sentence to this effect, would be beneficial.

Annex 1 – Schedule of Site Proposals (MM 80 – soundness)

This section includes some overarching feedback on the proposed modifications, with more detailed feedback on the background text and some of the individual sites with heritage considerations provided in an appendix.

However, it appears that We also recommend that a caveat is provided regarding the APAs and the fact that they are due to be reviewed; as this means that new APAs could be identified and the boundaries of existed ones altered.

¹² When scheduled monuments are affected the HE Development Advice team should be consulted.

¹³ Please note that the Levelling Up and Regeneration Act (2023) includes provisions to place a statutory duty on all local planning authorities to maintain such a Historic Environment Record and HE (GLAAS) will be contacting all London boroughs to agree how this will work in London, where the expectation is that the current arrangement of a single HER hosted by HE should continue.

¹⁴ i.e. the solid walls absorb and release water vapour.





Overall, we welcome the modifications throughout Annex 1 and recognise that they seek to strengthen consideration of the historic environment. However, we are also concerned that in places the policies are unclear and ambiguous because:

- The heritage assets identified in relation to the sites in Annex 1 are not always correct, with APAs in particular, often omitted. Nor are the assets always named/specified. For example, Site 23 (Bobath Centre) is said to feature just one listed building (unspecified); however, it appears to contain two grade II listed buildings: the Bobath Centre and the East Annexe to the Bobath Centre. The site also includes part of an APA (with the potential for medieval archaeological remains), which is not mentioned.
- The modifications to align the historic environment requirements with that of the NPPF have created inconsistency, as they often add the consideration significance (which is welcome) but have not removed considerations that are not relevant.
- There are places where townscape and heritage considerations are being conflated (see our comments below in relation to Sites 24, 27 and 28).

We advise that the sites are reviewed to ensure that all relevant heritage assets are mentioned in a consistent manner within a site policy that clearly aligns with the NPPF and Local Plan requirements for the conservation of the historic environment (see some suggested edits in the appendix below).

The MM clarification that applications for the site allocations should be accompanied by an archaeological assessment is welcome. However, it is not just archaeological interest that needs to inform the design of proposals and be assessed and we advise that a heritage impact assessment and/or archaeological desk-based assessment¹⁵ is included with planning application affecting heritage assets, and that this is required by CDH08 as well as the policies for each site. This would ensure consistency with the NPPF (para. 200) and London Plan (D9.C(d) and HC1.C), as well as the London Plan's design-led approach guidance which requires that the significance of any heritage asset that the development interacts with should inform its design parameters from the outset and then be assessed to understand how that significance is being affected.¹⁶

As an additional modification, it would be beneficial to clarify that where sites are located within APAs an archaeological evaluation may be necessary to clarify understanding of the archaeological resource. A greater understanding of this potential requirement, will be available once the APAs have been revised to meet the London Plan endorsed Historic England tiered framework.¹⁷

¹⁵ An HIA can assess effects to all types of heritage assets, provided that the author(s) have the relevant expertise (e.g. they are built heritage and archaeological professionals). Alternatively, an archaeological desk-based assessment could be prepared separately if there are only archaeological assets affected, or if separate built heritage and archaeological experts are used.

¹⁶ See *Optimising Site Capacity: A Design-Led Approach* guidance, sections 2.6-2.7.

¹⁷ GLAAS' risk model for tiered APAs is available [here](#).





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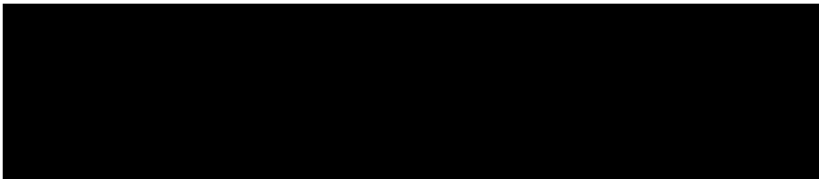
Conclusions

As highlighted throughout, there is much that we welcome in the proposed MM. However, the changes have also had unintended consequences and we have concerns, particularly relating to CDH04, CDH08, and Annex 1, where the lack of clarity and lack of consistency with the NPPF and London Plan has created soundness concerns. We hope that our comments are helpful in redressing these issues, and the other points of inaccuracy (additional modifications) noted, but please do get in touch if you have any queries or require clarification on any of the points raised.

Finally, please note that the advice provided herein is based on the information that has been provided to us within the consultation documents. It does not affect our obligation to advise on, and potentially object to any specific proposal subsequently arising from these documents, should it have adverse effects on the historic environment.

Yours faithfully,

Michelle Statton



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Appendix: Annex 1 comments

Please note that feedback provided in relation to each site is intended to exemplify different issues (covered above) that need addressing throughout the Annex and does not necessarily cover every example of that issue.

Background text: (additional modification)

We suggest amending the modification at paragraph 16.1.6 to *'Although these constraints are not absolute, physical or environmental factors, such as ~~conservation areas~~ heritage assets or flood risk...'*. 'Heritage assets' is a broader term and its use ensures that conservation areas are not misconstrued as being a special category.

Site 1. Former Church Farm Leisure Centre

Suggested clear and unambiguous text for the historic environment considerations of the MM proposed for Site 1.

'In line with the design-led approach of CDH04.B, an understanding of the significance (including any contribution made by setting) of the historic environment should inform proposals from the outset, ensuring that the significance of the heritage assets is conserved or enhanced, and that proposals – in particular the height and form – respond in such a way that any harm is avoided or minimised. In line with the requirements of CDH08, applications are to be accompanied by the submission of a proportionate heritage impact assessment (HIA), considering effects on the significance of all heritage assets potentially affected by the site proposals. Key above ground heritage assets to be considered within the HIA include the adjacent Grade II St Mary's Church (Barnet's oldest surviving building), and the Grade II listed 1 and 2 Church Farm School cottages and water tower, which are of group value as part of a former Industrial Boys School. As the site is located within an archaeological priority area the HIA should either include an assessment of archaeological potential, significance and effects, or a separate archaeological desk-based assessment will be required. Depending on the results of the archaeological assessment and consultation view of GLAAS, an archaeological evaluation may also be needed.'*

Site 7: Bingo Hall Cricklewood (Cricklewood Growth Area) (additional modification)

'Tall buildings may be appropriate; however, all tall building proposals will be subject to a detailed assessment of how the proposed building relates to its surroundings, responds to topography, ~~contributes to townscape and historic character, relates to public realm, the natural and historic environment, and digital connectivity.~~ The approach to tall buildings must be consistent with Policy CDH04 and CDH08 of the Local Plan ~~and give consideration to the relationship with the setting of the nearby Railway Terraces Conservation Area.'~~





Site 24: East Finchley Station Car Park (East Finchley Town Centre)

'Sensitive design is vital to conserve ~~and~~ or enhance the significance of the adjacent Grade II listed station building and adjacent Hampstead Garden Suburb Conservation Area, including any contribution made by ~~and~~ their settings.' (soundness – consistency with the NPPF)

'High quality public realm is required to the front of the building to complement and enhance the existing station frontage in townscape terms.' (Additional modification. Note that adding a reference to HE's [Streets for All Guidance](#) here would be beneficial).

Site 27: Edgware Town Centre (Edgware Growth Area)

For clarity, it would be beneficial to state that the Grade II Railway Hotel and APA need to be considered in line with the requirements of CDH04.B and CDH08. Additionally, their consideration needs to be separate to that of the character of the townscape (see text for site 28 below)

Site 28: Edgware Underground & Bus Stations (Edgware Growth Area)

'Proposals must carefully consider the ~~context~~ significance of the adjacent Watling Estate Conservation Area; to ensure that ~~the significance of nearby heritage assets are~~ it is conserved or enhanced, ~~and~~ The sites relationship with surrounding low-rise suburban housing should also be considered.' (soundness – consistency with the NPPF).

Site 40: Meritage Centre

'to ensure that the significance of ~~designated~~ heritage assets are is conserved or enhanced ~~and~~ that the effect of non designated heritage assets is taken into account.' (Soundness - the NPPF requires that the significance of all heritage assets is conserved or enhanced, it is just that the weight given to that conservation differs depending on the importance of the asset).

Site 47: Mill Hill East Station

It is unclear why one of the modifications to this site's policy discusses it being demolished when other site policies (e.g. Site 48) state that locally listed buildings should be retained and integrated into proposals. We consider the approach for Site 47 to run counter to that required by the NPPF (para.196).

