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London Borough of Barnet
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6 August 2021

Dear Sir/Madam

London Borough of Barnet: Local Plan Regulation 19 Consultation

Thank you for the opportunity to comment on the above consultation document. As the Government's adviser on the historic environment, Historic England is keen to ensure that the conservation and enhancement of the historic environment is taken fully into account at all stages and levels of the Local Plan process. Our comments are made in the context of the principles relating to the historic environment and local plans within the National Planning Policy Framework (NPPF) and the accompanying Planning Practice Guide (PPG).

Historic England notes and welcomes the many of the amendments introduced in this draft of the local plan. In particular, we consider the new references to the historic environment both within the vision, themes and objectives section (at para 3.2.2 and Table 2) and policy BSS01 Spatial Strategy to be important. These help demonstrate the Council's and the Plan's commitment to both a positive strategy for the historic environment as per the NPPF para 20 and successfully achieving its conservation and enhancement. Nevertheless, there remain some areas where we believe the draft Plan continues to fail to reflect the requirements of national and regional planning policy.

Policy CDH04 Tall Buildings

We continue to have concerns regarding this policy. As set out, we do not consider it conforms to policy D9.B2 of the 2021 London Plan, which requires that appropriate heights (as well as locations) of tall buildings are defined in boroughs development plans. While we



note the intention indicated in the Plan to prepare a Supplementary Planning Document which would contain further detail on heights, this would not form part of the Plan itself given its presence in the proposed SPD. We further consider that the current draft is therefore ambiguous in relation to tall buildings, both with regard to the nine strategic locations identified in CDH04 and those site allocations where tall buildings are also identified as potentially appropriate. As a result, we consider the Plan is potentially contrary to para 16 d of the NPPF that requires local policies to be clearly written and unambiguous.

While we would stress that we do not have any in-principle objection to tall building proposals in the strategic locations, it is clearly important that the full extent of potential adverse impacts of such proposals on the historic environment are understood at a stage in the plan-making process early enough to ensure they are avoided. We therefore consider that further work is required to define appropriate height ranges within the relevant sites in the Schedule of Site Proposals at Annex 1.

Policy CDH08 Barnet's Heritage

We note and welcome the expansion of the supporting text (now paras 6.23.1-6.33.1) to policy CDH08, and consider this sets out a helpful understanding of the borough's current position in relation to the historic environment. We further note the significant changes to policy CDH08 itself and the introduction of separate sections relating to different types of heritage asset. Taken individually, including the opening paragraph, we do not consider that there is anything that we would disagree within CDH08 although we would question the level of repetition of national policy and whether this adds value to the local plan. However, we would suggest that the policy as a whole could be made more straightforward through the removal of the first two overarching paragraphs, which in effect repeat text elsewhere.

Policy ECC01 Mitigating Climate Change

We note and welcome new para 10.6.3 which provides helpful detail on potential refurbishment and retrofitting of existing and historic buildings. Similarly, we consider new para 6.27.1 in the supporting text to policy CDH08 to also be helpful in highlighting the challenges of improving energy efficiency of historic buildings without adversely affecting heritage significance. Nevertheless, we consider that it should be made clear (both at para 10.6.3 and clause h) of ECC01) that historic buildings may need different and non-standard interventions to reduce energy consumption and carbon emissions to avoid effects on significance. This should include reference to assessment and understanding of where buildings are currently deficient and that minimal or non-invasive approaches should be the starting point of an iterative strategy.

Site allocations

Further to our comments on tall buildings above, we note a number of amendments to the development guidelines for sites referred to in Historic England's response to the Regulation 18 consultation (sites 11, 34, 39 and 41). However, we would reiterate our comments in relation to a number of other sites where we consider the development guidelines are such that there remains a risk that proposals will come forward that would conflict with policies elsewhere in the plan designed to conserve the historic environment. We consider that further detail at this stage will provide greater clarity and certainty for all stakeholders over what would be allowed on each site.

Site 1 – Church Farm Leisure Centre

Given the number of designated heritage assets either adjacent to or in close proximity to the site, we consider that there should be greater detail in the policy as to how effects of any development will be managed. This should include any potential effects on setting and include a requirement for archaeological assessment.

Site 8 – Broadway Retail Park

We note the new reference to nearby conservation areas. It would be helpful to include a requirement to take into account the relevant conservation area appraisals and any key views in the development guidelines (as has been included with Site 11).

Site 23 – Bobath Centre

It is important to be clear about the significance of any heritage assets present on site allocations – both listed buildings on the site should be identified in the policy, rather than one as at present.

Site 24 – East Finchley station car park

The identified capacity on the site is such that there will undoubtedly be impacts on the listed station building. As set out, there does not appear to have been any analysis of the heritage significance of the station or whether this significance will be affected by any development within the parameters set by the allocation. We would direct you to our advice note on this subject, which includes a step by step methodology for just such a scenario: <https://historicengland.org.uk/images-books/publications/historic-environment-and-site-allocations-in-local-plans/>. We would stress that we are not opposed in principle to development on this site, but would urge some analysis of the likely impacts to be able to



make an informed decision as to the effects on the historic environment. It should also be made clear that this location is not appropriate for a tall building.

Site 40 – Meritage Centre

We understand that the Council has now adopted an SPD to guide redevelopment of this site. As such, we would simply direct you to our advice letter dated 19th July 2021 (ref PA01159685) regarding the Hendon Hub proposals for details of our position. We continue to consider that any buildings proposed to replace the existing Meritage Centre should be low-rise to avoid adverse impacts on the conservation area.

I trust these comments are helpful. Please note that this advice is based on the information that has been provided to us and does not affect our obligation to advise on, and potentially object to any specific development proposal which may subsequently arise from these documents, and which may have adverse effects on the environment.

In the meantime, please do not hesitate to contact me should you require any further information.

Yours faithfully

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