

<u>MEETING</u>
COUNCIL
<u>DATE AND TIME</u>
TUESDAY 27TH JULY, 2021
AT 7.00 PM
<u>VENUE</u>
HENDON TOWN HALL, THE BURROUGHS, LONDON, NW4 4BQ

Dear Councillors,

Please find enclosed supplementary information for the below item.

The Hendon Hub project team received feedback from Historic England on proposals on 20th July which meant that it wasn't possible for this feedback to be shared with Members in time for the Policy & Resources Committee on 20 July.

Item No	Title of Report	Pages
12.4	REFERRAL FROM POLICY & RESOURCES COMMITTEE - PROPOSED HENDON HUB REDEVELOPMENT FULL BUSINESS CASE	3 - 20

Abigail Lewis abigail.lewis@barnet.gov.uk 020 8359 4369

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Hendon Hub Project Team response to Historic England Feedback Letter (for Barnet Council Members)

AGENDA ITEM 12.4

The project team formally began dialogue with Historic England (HE) on 24th June 2021, once proposals for the Hendon Hub were at a mature stage of development. The timing of engagement was primarily due to the team ensuring that proposals were at a stage of development that took into account all feedback received from residents, stakeholders and other consultees, at the pre-planning phase. This therefore facilitated a meaningful and valuable conversation with HE on well-developed proposals.

HE's role is to assess the scale of harm caused by any development impacting on listed buildings, in order that the Local Planning Authority can weigh that harm against other benefits. Though technically not a legal requirement, LBB and the project team engaged with HE on proposals to replace Building 9 and the Meritage Centre. Their comments on the proposals are summarised as follows:

Meritage Centre feedback

HE placed very little value on the resulting 'opening up' of views towards the Parish Church of St Mary. It was their opinion that the Church was "*not intended to be viewed from any particular angle*".

It was also HE's view that the proposed blocks (specifically blocks 1 and 2) were too large. Proposed building heights have therefore now been reduced and as a result, HE expressed the view that the proposed reduction in height [particularly to blocks 1 and 2 within the Church End CA] reduced the negative impacts of the development on the Conservation Area. HE also considered the reduction in height of the block closest to Church Terrace as "positive".

HE also makes reference to 28 Church End which dates from around the 1850s. The building is noted in the conservation area appraisal as a 'positive building' within the conservation area, and whilst in no way exceptional, it references part of the history of the development of the settlement.

Whilst the team understand and respect HE's view, they strongly feel that the retention of the house and possibly the 1930's neighbouring property (30 Church End) would significantly compromise the quality and integrity of the sensitive regeneration proposals for the site.

The proposed approach at this time is therefore to propose ways in which the historic characteristics of those two buildings can be captured within the new-build fabric and landscaping - for example, with artwork within the façade of the new blocks.

Building 9 Feedback

Historic England were explicit in relation to the replacement of the existing UPVC and crittall windows with timber sash windows, and the suggestion to clean, repair and renovate the roof and building facades. It is therefore proposed to undertake this work and also to restore the Hendon library staircase and the remaining original internal features of merit, by removing recent partitions, cleaning the façade, renovating the glazed rooflight and ceilings, and further enhancing the building's listed characteristics.

The project team and their consultants, GL Hearn have taken the advice provided by Historic England on board and will be carefully considering any further amendments to the scheme that may be appropriate. Though there are some differences of perspective from LBB and HE, the project team will continue to engage with them to inform the Hendon Hub planning application, should the FBC be approved.

The attached documents include a detailed letter from GL Hearn, containing a detailed response to HE's comments and the proposed next steps.

Attachments:

1. GL Hearn letter to Cath Shaw – 'Re: - Hendon Hub (applicant) response to Historic England Pre-application Advice Letter (Ref: PA01159685), dated 19/07/21' – dated 23 July 2021
2. Historic England letter to GL Hearn – 'PA01159685' – dated 19 July 2021



Mr Selwyn Atkinson
3287

Direct Dial: 020 7973

GL Hearn

4th Floor
PA01159685

Our ref:

65 Gresham Street

London

EC2V 7NQ
2021

19 July

Dear Mr Atkinson

Pre-application Advice

HENDON HUB

Historic England has been asked for pre-application advice on two sites that form part of the broader Hendon Hub masterplan area. As the two sites are separate and present different issues, they have been treated separately within this letter.

Meritage Centre site

Summary

The Meritage Centre site is a significant part of the Church End conservation area, which consists of the surviving elements of a small hamlet clustered around a Grade II*-listed church. The demolition of the Meritage Centre is uncontroversial, but a historic building that is a positive contributor to the conservation area would also be demolished, and the proposed replacement student accommodation buildings would be excessively sized and relatively coarse in terms of their urban grain, causing harm. The significant harm resulting to the conservation area should be given great weight in the balancing of harm against public benefit in appraising the scheme. While it will be



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for the decision-maker to undertake this balancing exercise, it is disappointing that in this scheme, the potential of the only significant development site within the conservation area to enhance the character and appearance of the conservation area has not been fully realised.

Advice

Significance

The Meritage Centre site lies at the heart of the Church End conservation area, which covers the historic hamlet of Church End centred around the Hendon parish church of St Mary. Despite the ancient presence of the parish church, centre of a large parish, this was only ever a hamlet, with the church, an inn, two farms and a few houses clustered around it, and various roads and paths centred on this intersection stretching out into the surrounding fields. Much of the historic hamlet survives in some form, but this only consists of 10-12 historic buildings, depending on the definition used, and the conservation area is largely surrounded by suburban development of the last 150 years.

The various historic buildings of the conservation area, including the parish church (Grade II*), Church Farm House (Grade II*), the model farm milking parlour (Grade II), and the Daniel almshouses (Grade II), also derive part of their significance from their setting, including the inter-relationship between each other and their positions as part of the historic hamlet, which is still discernable despite harmful mid-late twentieth century development.

The historic pattern of roads and paths in the conservation area is largely intact, and a number of historic footpaths have been preserved in the wider landscape, despite the areas they run through having long been built-up. This is important to the significance of the conservation area in terms of retaining a sense in which it is the heart of the area, which routes radiate towards. Church Terrace is a particularly good example of this, as it runs north from the conservation area through open land (Sunny Hill Park) as far as the A1. Of the views of the church and the conservation area, that looking north up Church End towards the church is perhaps the most relevant in the context of this proposal. However, the mapping evidence demonstrates that while the Daniel almshouses were designed to have a formal axial presence at the southern end of Church End, the view north round the curve of the street to the church was an informal, unplanned one, with the church historically being glimpsed over lower buildings that shepherd one round the curve, and then the body of the church emerging as a surprise in a gap between smaller domestic buildings.

The post-war development around the conservation area detracts from its significance to some degree, by eroding the effect of a rural hamlet while introducing nothing of



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particular interest. Particularly harmful are the relatively recent buildings of Middlesex University immediately to the south-west of the conservation area; their alien scale, planning, coarse grain, height and cladding materials mean that they cause a significant degree of harm to the conservation area by damaging its setting.

The existing Meritage Centre buildings are of no interest in themselves, and do not make any contribution to the significance of the conservation area. They are not insensitive, by the standards of the time at which they were built; their height is appropriate. This is why Historic England has previously advised that new development on this site should be of similar height. The use of brick is also contextual, and the massing of the building fronting Church End has clearly been contrived with the setting of the church in mind. However, the buildings have a poor relationship with the streets of Church End and Church Terrace, instead feeling as if they are objects dropped into landscaping in a typically modernist way.

28 Church End, dating perhaps from the 1850s, is the survivor of what was a small terrace of three houses (the northernmost two were demolished to build the current 30 Church End). It is the last survivor of the initial 19th century expansion of Hendon village, and is therefore a significant part of the history of the settlement, holding evidential value. Despite its somewhat rundown condition, it also holds aesthetic value as a classic small terraced London house of the period, with its stock brick, sash windows, moulded window frames and traditional proportions. It is noted on the conservation area appraisal as a 'Positive Building' within the conservation area, and this is an assessment that we endorse.

30 Church End is a semi-detached house that was built between 1936-56 based on mapping evidence, and probably in the late 1930s on stylistic evidence. It relates successfully to the conservation area in that it is of a suitable scale and relatively fine grain, it relates well to the street, and its muted materials, colours and textures are appropriate for the conservation area. It reads as part of the cluster of small houses around the church which positively contribute to its domestic scale setting.

Impact

The proposals involve the complete demolition of the Meritage Centre and adjoining contemporary buildings, the demolition of 28 and 30 Church End, and complete redevelopment of the site (which includes two areas just outside the conservation area, one of which is separate and slightly to the south of the principal site). Demolition of the Meritage Centre would not have an adverse impact on the conservation area or the setting of the nearby listed buildings.

Demolition of 28 Church End, a positive contributor to the conservation area, would cause harm to the conservation area. It would remove the last evidence of the



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nineteenth century expansion of the settlement, and would remove one of only 10-12 historic buildings within the conservation area. This would result in a significant level of harm, exacerbated by the demolition of 30 Church End, which also makes a positive contribution, albeit a lesser one, to the conservation area. The small size and fragility of this conservation area means that the loss of these buildings has a considerably greater relative impact on the conservation area than it would in many other conservation areas.

The proposed redevelopment of the site would be for two blocks of student accommodation of 2-3 storeys within the conservation area, and a further two blocks just outside it. Both of the blocks within the conservation area have their primary fronts (the long fronts with greatest height, and continuous gables) facing Church Terrace. The elevations facing Church End feel in massing terms like the backs, set back from the street, despite the presence of a space designated for a doctor's surgery. This does not fit well with the character of the conservation area, in which the top of Church End is the primary street and focus of the village and Church Terrace has historically been little more than a footpath. The height reduction shown in the amended plans, from 3-4 storeys down to 2-3 storeys, reduces the level of harm. Having carefully considered the impacts and our previous advice, Historic England considers that this is a broadly appropriate height, given that the two storey sections are towards Church End, on the more sensitive western side of the site.

However, the area of each of the two proposed blocks in the conservation area is comparable to that of the church. This is considered an excessive size and coarseness of grain in a conservation area the character of which is fundamentally defined by being a historic hamlet that consists of small domestic buildings that are subservient to the church in terms of their size. While the grain of the Meritage Centre is too coarse, the proposed development would make this worse.

The proposed layout does preserve a pedestrian connection west from the junction of Church Walk and Church Terrace to connect with Church End. This is not a very obvious or prominent connection, and more could be done in landscaping terms to signpost the presence and significance of these routes.

Policy

The 1990 Listed Buildings Act, the National Planning Policy Framework (NPPF), the London Plan and local plan and other local and national policy and guidance provide the framework for decision-taking on heritage applications.

At paragraph 192, the NPPF emphasises “the desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation”.



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The NPPF continues at para 193: “When considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset’s conservation (and the more important the asset, the greater the weight should be). This is irrespective of whether any potential harm amounts to substantial harm, total loss or less than substantial harm to its significance.”

The adopted SPD Design Brief for the Meritage Centre site emphasises that development should not be ‘overbearing or imposing on’ St Mary’s church, and states that ‘a terraced form of development could fit the site, provide small individual footprints and therefore enforce pleasant continuity’.

Position

These impacts would result in a significant degree of less than substantial harm to the conservation area and to the setting of the church, because of the demolition of two of the few historic buildings within the conservation area, one of which is formally acknowledged as a positive contributor, and because of the coarsening of the urban grain that the erection of two blocks of this size represents. It will be for the decision-maker to balance this harm against the public benefits of the scheme.

Mitigation for the harm that the scheme would cause could include streetscape improvements to the conservation area as a whole, which has a variety of ill thought-out and inappropriate boundary treatments, street furniture and paving which harms the conservation area. There is considerable potential for the atmosphere of the conservation area to be improved with a well-thought out scheme for improving these in the whole of this small conservation area.

Bearing in mind that the Church End conservation area is very small, and fragile, and that this is probably the only potential development site on any scale that will ever come forward in it, it is disappointing that the potential that the Meritage Centre site has for improving the significance of the conservation area has not been realised by this scheme. A finer-grained residential scheme would be more likely to achieve the statutory objectives of preserving and enhancing the character and appearance of the conservation area.

Building 9 site Summary

The Hendon civic complex is an important group of early twentieth century civic buildings at the heart of the modern story of the suburb. The proposed new Building 9 would have an impact on the setting of the surrounding and attached listed buildings, as well a physical impact where it linked to the town hall and library. This harm would have to be balanced against the public benefits of the scheme. These should include a



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full restoration of the library building including reinstatement of wooden sash windows where these have been replaced in uPVC.

Advice

Significance

The site of Building 9 of the Middlesex University campus lies at the heart of the early C20 civic complex of Hendon, with neighbouring buildings including the town hall and annexe, the library and the fire station (all statutorily listed). It is clearly separated from the older village centre to the north around St Mary's church.

Building 9 dates from the 1930s and was built as a health centre. It has an attractive frontage facing south in Art Deco style, which has a conventional low-pitched slate hipped roof. We understand that it has recently been decided not to list the building. It does make a contribution to the setting of the surrounding listed civic buildings in that it is part of the story of the development of public facilities in the borough.

Hendon Town Hall dates from 1900, and is listed at Grade II. Its significance lies primarily in the original building facing The Burroughs. It was later extended to the west in matching style in 1929, and in 1960 the annex was built, again in matching style, which forms part of the Building 9 site. It is linked to the rest of the town hall by a first floor enclosed bridge. The 1929 rear extensions, while handsomely and solidly constructed in brick and stone, do not seem externally to be of huge interest in their own right. They do, however, contribute to the significance of the town hall complex by demonstrating a continuity of architectural vision within the council that lasted for sixty years. They are also built with a high quality of materials and craftsmanship. The annex itself is three storeys rather than the two of the rest of the complex. It does not speak of the 1960s at all, but it is a building of quality, of more distinction than the earlier additions to the town hall, and it adds to the interest of the civic complex as a whole. It would be helpful to know who designed it.

Hendon Library, dating from 1929, is listed at Grade II, and is well-described in the list description as 'a distinguished example of a Neo-Georgian public library'. It is uncertain from the evidence provided precisely how much of the historic interior survives. It would be helpful to have more detailed information about the interiors and the changes that have been made since the erection of the library, so that decisions about the future evolution of the building can be made on the basis of full knowledge. The RIBA photo library has a photo of an impressive internal dome to which no reference is made in the documentation provided, for example, raising the question of whether this survives concealed. It is clear however that the focus of interest is the main frontage and some elements of the interior. The railings with which the building was provided were doubtless removed in the second world war, and at some stage afterwards the dwarf brick walls were also removed and replaced, in typical fashion,



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with more rustic dwarf walls built from what looks like rock-faced artificial stone, which detract from the politeness of the principal façade. At some stage a number of the sash windows have also been replaced in uPVC, including to part of the principal façade, and again this detracts from the appearance of the building.

In 1973 the space between the rear wings of the library was infilled, in a low-quality fashion that detracts from the interest of the building. It is unclear precisely how much physical damage this caused to the surrounding rear elevations. It would be helpful to have drawings showing this.

Impact

The proposals involve the complete demolition of Building 9 and its replacement with a four storey building linking through to the annex at one end and the rear of the library at the other end.

The demolition of Building 9 would, on the basis of the evidence we have about the building, cause a minor degree of harm to the significance of the surrounding listed buildings, by removing evidence of one phase of the development of the complex.

The impact of the proposed replacement building is clearly more complicated. The four storey scale would be a little lower than the annex building and a storey higher than the town hall extension. Symbolically and visually it would cause a degree of damage to the setting of the town hall for a neighbouring building to be higher than the town hall, which should in terms of the hierarchy of classical architecture be the dominant building. However, the height difference would be moderate, and it would be the less significant rear portion of the town hall that would be affected. The building would block the oblique view of the town hall annex that can be seen from The Burroughs through the gap between the town hall and library, which is attractive and gives a sense of depth to the civic complex, and this would cause a small degree of harm.

The architectural style of the proposed building, with repeated brick bay elevations, portrait windows, and a mansard roof, is contextual and appropriate.

The physical connection between the new building and the annex would be a glazed link, with just one connection punched through a window at first floor level. The top of this link would be below the eaves of the annex building, and it would be an appropriately sensitive connection. The eastern elevation of the annex would clearly be obscured from outside, but it would be visible internally. There would be a small degree of harm from these impacts.

The connection between the new building and the library is more complex. The 1970s infill in the rear of the library would be removed and replaced, and a new infill inserted,



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which is acceptable in principle. Above the new infill would be placed the plant for the new building, behind a screen. These changes would, according to the drawings, involve removing three inward-facing rooflights and one inward-facing dormer on the roof of the library. No information has been provided about the spaces these rooflights and dormer light, and the resulting impact on them, and no justification has been provided for this change, which is likely to be harmful. This should be clarified.

These changes would also involve truncating the original roof of the rear of the library. This would cause harm, by removing original fabric and obscuring the original form and extent of the building, and has not been justified. It has been decided to roof the glazed link between the library and the new building in a pitched slate roof, continuing the form and materials of the roof of the library. The result of this would be to obscure where the listed building ends and the new one begins, causing harm. The undesirable impression that may result is that the library is an extension growing out of a larger building behind, rather than being a discrete structure.

It is stated that the historic library building will be restored as part of the works, which could potentially have a positive impact on the significance of the building, depending on the quality and scope of works.

Policy

The policy framework for the scheme on this site has been referenced above.

Position

The demolition of the health centre would cause a small degree of harm to the setting of the surrounding listed buildings, as would the obscuring of the east face of the annex because of the new link to the replacement building, and the slightly excessive scale of the proposed new building. While the proposed new building is broadly acceptable, its connection to the library should be refined to clarify the distinction between new and old. The historic roof should remain unaltered, and if it is proposed to remove the inward-facing rooflights, their function and internal significance should be explained, and this should be justified. The harm caused by the scheme should be weighed against public benefits, which should include restoration of the library building, including reinstatement of those wooden sash windows that have been replaced in uPVC. There is also potential to improve the landscaping fronting The Burroughs, where the original brick walls and railings have been replaced with a less appropriate post-war landscaping scheme.

Next Steps

Thank you for involving us at the pre-application stage. We recommend that you address the issues as outlined above before any statutory approval is sought.

Yours sincerely



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Historic England

Chris Costelloe
Inspector of Historic Buildings and Areas
E-mail: christopher.costelloe@historicengland.org.uk

HENDON HUB Pre-application Advice

List of information on which the above advice is based
Information Provided - pre-app documents as provided



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Mrs Cath Shaw
London Borough of Barnet
2 Bristol Avenue
Colindale
London NW9 4EW

23rd July 2021

Dear Mrs Shaw,

Re: - Hendon Hub (applicant) response to Historic England Pre-application Advice Letter (Ref: PA01159685), dated 19/07/21

Introduction

This letter sets out the Hendon Hub project team response to the advice received from Historic England regarding proposals to redevelop Meritage Centre and Building 9 development sites.

Summary of engagement with LBB and Historic England

Prior to the first meeting with Historic England on 24th June 2021, the project team, including Montagu Evans, the Heritage Advisors had attended a number of formal pre-application meetings with London Borough of Barnet's Planning Team in regard to the proposals. These meetings were attended by the applicant's project team and Planning Officers from the LPA including the Principal Urban Designer, Arboricultural Consultant, Planning Policy Manager and Urban Design & Heritage Team Leader and the design of the sites has been worked up in response to the feedback received at these meetings.

On 24th June 2021 the project team met with Historic England (HE) to discuss proposals for the Building 9 and Meritage Centre sites. This was considered as being the earliest opportunity to engage with Historic England as the Pre-Application Advisory Service requires proposals to have reached a level of 'maturity' to enable HE to determine whether they need further involvement. Prior to June 2021 the proposals had not been progressed to a level of 'maturity' suitable for pre-application discussion with Historic England because from March to June 2021 the Hendon Hub non-statutory public consultation was being held. The applicant and project team felt it important that consideration of the public consultation responses informed the iterative design process.

Justification for pre-planning submission discussions with Historic England

The Secretary of States' *Direction 'Arrangements for Handling Heritage Applications – Notification to Historic England and National Amenity Societies and the Secretary of State (England) Direction 2021'* determines which planning applications are 'notifiable' to Historic England.

Paragraph 4 (a)(ii) of the 2021 Direction requires Local Planning Authorities to notify Historic England where (inter alia) 'Relevant Works' are proposed in respect of any Grade II (unstarred) listed

building. ‘Relevant Works’ include the demolition of a listed building which forms part of the proposals for Building 9 (i.e. demolition of the 1973 rear addition to Hendon library).

The Historic England ‘Proposals for Development Management’ Document (February 2019) requests that Local Planning Authorities ‘notify’ Historic England when applications for the following developments are registered/validated (see **table 1**).

Table 1: Other ‘nofitable’ development according to HE Document (February 2019)		
Proposed Development	Criteria for Notification	Reason for Notification
The Meritage Centre	‘Notification’ is requested if a planning application has the potential to affect the setting of a Grade II* Listed Building.	Meritage site boundary adjoins the curtilage of the Grade II* Listed Parish Church of St Mary.
	‘Notification’ is requested if a development for the erection of a new building has in the opinion of the Council or Secretary of State the potential to affect the character or appearance of a conservation area.	The development includes the demolition of the 1960s/1970s Meritage Centre complex followed by the erection of four 3 to 4 storey blocks. Two out of the four proposed blocks fall within the Church End Conservation Area.
	‘Notification’ is requested when a Local Authority’s own application for conservation area consent is made.	The applicant/landowner is the London Borough of Barnet.

It should be noted that the proposals for the Meritage Centre and Building 9 do not fall under Article 3 of The Town and Country Planning (Development Management Procedure) (England) Order 2015 i.e. development requiring pre-application ‘consultation’. Neither do any of the Hendon Hub applications require ‘consultation’ with Historic England under the 2015 Order in accordance with Article 18 and Schedule 4 ‘Consultations before the grant of permission’: The criteria for development requiring consultation in accordance with Article 18 and Schedule 4 is as follows:

- *Paragraph (q) development of land involving the demolition, in whole or in part, or the material alteration of a listed building which is classified as Grade I or Grade II*,*
- *Paragraph (r) development likely to affect the site of a scheduled monument or*
- *Paragraph (s) development likely to affect any battlefield, garden or park of special historic interest which is registered in accordance with section 8C of the Historic Buildings and Ancient Monuments Act 1953 (register of gardens)*

None of which apply to the proposed Hendon Hub planning applications.

Concluding remarks

The Local Planning Authority is not required to ‘consult’ Historic England on the Building 9 and Meritage Centre proposals – either pre-application or post submission – however, the Local Planning Authority is under a duty to ‘notify’ Historic England.

The Local Planning Authority is not required to ‘consult’ or ‘notify’ Historic England of the proposals for the redevelopment of the Fuller Street Car Park, landscaping improvements around Hendon and

the redevelopment of the Ravensfield and Fenella site, as the applications for these sites do not propose works to and/or affect the setting of relevant listed buildings.

Notwithstanding the above statutory obligations, the project team, as set out in this letter, have wanted to take a proactive approach and consult Historic England prior to submitting planning applications for the Building 9 and Meritage Centre sites. This is so that we as lead designers can understand Historic England's views and make changes to the scheme in response to their comments.

Meritage Centre – 1st pre-application meeting on 24th June 2021

Historic England's approach to evaluating the likely impacts of the development on the Church End Conservation Area differs from the approach adopted by the project team and the approach that has been discussed with the LBB Planning Team at the formal meetings. From the proposals inception the project team have been working to propose a development that is in accordance with Development Plan for the area and national planning policy.

London Borough of Barnet's Development Management Policies DPD (2012) specifically **Policy DM06 'Barnet's heritage and conservation', Part C** was instrumental in guiding the project team in devising proposals for the Meritage Centre. The policy states that proposals involving Barnet's heritage assets should demonstrate how the significance and setting of a heritage asset can be better revealed. The Grade II* Parish Church of St Mary adjoins the existing Meritage Centre site and is considered by the LBB **Hendon Church End Conservation Area Character Appraisal and Management Proposals Document (2012)** to be the principal building within the Church End Conservation Area. In accordance with the principles set out in **Policy DM06** the project team took the opportunity when designing the scheme to 'open up' views from various vantage points within the conservation area towards the Parish Church of St Mary.

Whilst the replacement of the existing Meritage Centre complex [a building considered detrimental to the overall character and appearance to the conservation area on page 41 of the Character Appraisal and Management Proposals Document] with a well-designed and proportionate cluster of standalone buildings was considered by the project team to result in a net enhancement to the Church End Conservation Area and setting of the Parish Church of St Mary [a view shared by the LBB Planning Team as confirmed in pre-application meetings/workshops], the feedback received from Historic England during the meeting suggested that they took a different view. Historic England placed very little value on the resulting 'opening up' of views towards the Parish Church of St Mary. It was their opinion that the Church was *"not intended to be viewed from any particular angle"*. We are of the opinion that the replacement of the existing Meritage Centre complex with a set of well-designed and well-proportioned contemporary blocks including the opening up of new vistas towards the Historic Church results in a net enhancement to the Church End Conservation Area as well as the setting of the Parish Church of St Mary. This opinion has also been expressed by the LBB Planning Team. It should be noted that the project team are fully aware that LBB Planning Team's views on the scheme may change following the conclusion of statutory consultations [post planning submission] and determination of the planning applications by LBB Strategic Planning Committee.

It was also Historic England's view that the proposed blocks were too large specifically blocks 1 and 2. Following the meeting the project team considered the comments from HE very carefully and made a number of design amendments in order to reduce the mass and height of buildings 1 and 2 to improve their relationship with Church End and St Mary's Church within the conservation area. This resulted in a reduction of 19 Student units.

Meritage Centre – 2nd pre-application meeting on 9th July 2021

During the second pre-application meeting, Historic England expressed the view that the proposed reduction in height [particularly to blocks 1 and 2 within the Church End CA] reduced the negative impacts of the development on the Conservation Area. Historic England also considered the reduction in height of the block closest to Church Terrace as “positive”. Whilst Historic England considered the revisions to be positive the project team and Historic England had an alternative professional view on the most appropriate layout for the paths and landscaping. The project team asserts that the replacement of the Meritage Centre complex [which has a footprint similar to the footprint of the Parish Church of St Mary] with two moderately sized blocks which have a smaller footprint is a more appropriate design response and is more ‘in keeping’ with the vernacular and character of the Church End Conservation Area.

Historic England Pre-application Feedback Letter (dated 19th July 2021)

On page 4 [first paragraph] of the attached feedback letter HE acknowledges that the reduction to the development’s height/mass/units reduces the level of harm to the Conservation Area and in their opinion, this is “broadly appropriate”. However Historic England still take the view that blocks 1 and 2 “compete” with the Parish Church of St Mary as they are of a similar height. This view fails to acknowledge that proposed blocks 1 and 2 have a smaller footprint than the existing Meritage Centre complex and therefore the two substituting structures would have a less dominant presence within the setting of the Parish Church of St Mary.

In their letter Historic England also makes reference to 28 Church End which dates from around the 1850s. This was the last house of what was a small terrace of three houses which formed part of the initial 19th century expansion of Hendon village.

No.28 Church End is noted in the conservation area appraisal as a ‘Positive Building’ within the conservation area, and whilst in no way exceptional, it references part of the history of the development of the settlement.

Whilst we understand the reference point that No. 28 holds at a point in time for the development of the settlement, we strongly feel that the retention of the house and possibly the 1930’s neighbour 30 Church End would significantly compromise the quality and integrity of the sensitive regeneration proposals for the site. We would note the Historic England reference to evidential value of No 28 Church End and as such would propose to integrate a reference to its history and capture this within the new build fabric and landscaping, with for example artwork within the façade of the new blocks. Any proposal for a memorial feature will be subject to consultation and determination by LBB Strategic Planning Committee.

The project team agrees with the view expressed by Historic England on page 1 of the letter which states that the final assessment of the proposals will be subject to the balancing exercise as required under **paragraphs 202 and 203** of the **NPPF (2021)** i.e. it will be for the ‘decision maker’ to weigh up the benefits and harm to the heritage assets [identified by HE and LBB Planning Team] in order to determine whether the former outweighs the latter. Great weight will be given to the conservation of heritage assets in accordance with **Paragraph 199** of the NPPF. **Section 66** and **section 71** of the **Planning (Listed Buildings and Conservation Areas) Act 1990** also places a duty on the LPA to have special regard to the desirability of preserving listed buildings and their setting and to have regard to preserving and enhancing the Church End Conservation Area in accordance with the recommendations of the **LBB Hendon Church End Conservation Area Character Appraisal and Management Proposals Document (2012)**.

Historic England has a remit to provide advice to applicants and LPAs on issues [only] affecting the historic environment. As the Local Planning Authority for the area, LBB must have regard to a wider range of policy objectives and considerations [as per **Section 70(2)** of the **Town and Country Planning Act 1990**]. In accordance with this duty under The Act, LBB Planning Team must consider development impacts on heritage assets as well as consider opportunities for increasing housing supply (including student accommodation), jobs and training for local people. For the purposes of **section 70(2)** of the Act, the Barnet Local Plan (Core Strategy and Development Management Document 2012) and the Greater London Authority London Plan (2021) comprises the Development Plan for the area.

In this regard it is worth noting that project team presented proposals for the RFC site to Greater London Authority on 29th September 2020 and 10th February 2021 (RFC is a referable development to the GLA under the criteria set out in the Mayor of London Order (2008)). Formal feedback was received on 24th March 2021 and a summary of comments made by the GLA in relation to the proposals are provided below:

- Under Policy H1, Table 4.1, of the London Plan, a ten-year target of 23,550 [since published has been revised up to 23,640] homes is set for the London Borough of Barnet. Paragraph 4.1.9 of the London Plan states that net non-self-contained student accommodation should count towards meeting housing targets on a 2.5:1 ratio.....which would contribute positively to the above target and would be strongly supported (paragraph 11).
- The overall ambition and endeavour to bring together various sites as part of a masterplan with the potential to truly benefit The Burroughs and this part of Hendon is welcomed. There is a real opportunity to make the most of Middlesex University as a centre of activity for Hendon and LB Barnet (paragraph 24).

London Plan **Policy H1 'Increasing housing supply' Part B** requires LB Barnet to ensure that the 10-year housing target (as described above) is achieved. Supporting **paragraph 4.1.8** states that non-self-contained accommodation for students should count towards meeting housing targets on the basis of a 2.5:1 ratio. The proposals for the Meritage Centre will make a tangible contribution towards the Borough's ten-year housing target of 23,640 homes.

The project team would like to point out that the public benefits which would flow as a result of the Building 9 and Meritage Centre proposals weigh heavily in favour of the proposals and are substantial in their quantitative and qualitative impacts on job creation and the local economy. These impacts can be reviewed in detail in the 'financial case' section of the Full Business Case (FBC). Historic England had also suggested several mitigations in paragraph 2 on page 5 of the feedback letter. Suggested mitigations include public realm improvements which have from inception of the Hendon Hub project formed part of the overall Hendon Hub Masterplan Area.

Having received Historic England's Feedback Letter the project team are now considering the points raised by Historic England and will advise on any further actions in due course. The project team will continue a dialogue with Historic England on the aspects that they have raised and will implement changes to the scheme, where felt appropriate.

Building 9 – 1st and 2nd pre-application meetings on 24th June 2021 and 19th July 2021

The project team are proposing to replace the existing UPVC and crittall windows with timber sash windows, clean, repair and renovate the roof and building facades and will restore the Hendon library staircase and the remaining original internal features of merit by removing recent partitions and cleaning the façade and renovating the glazed rooflight and ceilings.

In accordance with Historic England's comments more clarity and consideration will be given to the detail of the roof interface between the rear of the listed library and the new build business school. The proposals will ensure the historic hipped roof will not be disturbed and will be left unaltered.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Selwyn Atkinson', written in a cursive style.

Selwyn Atkinson MRTPI

Planning Associate Director

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