

# London Borough of Barnet Local Plan – Examination

## Inspectors' Matters, Issues and Questions for Hearing Sessions - Autumn 2022

### Matter 8: Design, Tall Buildings and Heritage

#### Issue:

Whether the Plan has been positively prepared and whether it is justified, effective, consistent with national policy and in general conformity with the London Plan in relation to design, tall buildings and heritage?

#### Questions:

- 1) Policy CDH01 seeks to promote high quality design; is it positively prepared, justified, effective, consistent with national policy and in general conformity with Policies D2 to D6 of the London Plan in that respect? Responses should specifically address the following:
  - a) Are the specific requirements of development proposals to comply with national space standards and associated definitions in Tables 9 and 10; justified and in general conformity with the London Plan?

***Yes. These are London Plan requirements of all London boroughs as set out in London Plan Policy D6 - Housing quality and standards. The Council is not required to provide any further local justifications for applying London-wide standards. The application of London Plan standards which apply the nationally described space standards as minimum requirements for new build homes is explained in Local Plan paras 6.7.1 and 6.81 and set out within Table 9. With regards to Table 10, in terms of requirements of internal layout and design, further explanation on how they should be applied is provided within para 6.9.1.***

- b) Whether the individual and cumulative policy requirements of development proposals reflect a design-led approach and are they sufficiently clear and effective, so it is evident how a decision maker should react to development proposals?

***The Council considers that the Local Plan, in particular Policy CDH01, clearly signals that all development must make the best use of land by following a design-led approach that optimises the capacity of sites, including site proposals. A design-led approach is essential to determine the most appropriate form of development that responds to existing context and capacity for growth, with due consideration to existing and planned supporting infrastructure. The Council considers that this design-led approach is reflected throughout the suite of Local Plan policies, which taken***

**together provide a clear policy basis for the decision maker when determining a development proposal.**

- c) Are there any additional requirements set out in the supporting text that are not reflected in the policy wording, are they justified and if so, should they be added to Policy CDH01 (or other related policies of the Plan) to be effective?

**No. All of the requirements set out in the supporting text are also reflected in the wording of CDH01. The Policy makes appropriate cross-reference to national and Londonwide requirements on design. Proposed modification (MM118) also reinforces a design-led approach.**

- d) Are the Council's relevant proposed modifications to design approaches necessary for soundness in terms of clarifying building safety for tall buildings and the approach to Secured by Design, and with respect to approaches to Design Codes and Design Reviews?

**The modifications (MM134 and MM138) with regards to the Buildings Safety Act 2022 (LP\_LEG\_12) are necessary for soundness. The other modifications to CDH01 and supporting text (MM130 to MM133 and MM135 to MM137) help to improve soundness.**

- e) Would any further changes to the policy or its supporting text be necessary to achieve soundness?

**No.**

- 2) Policy CDH02 provides a specific approach to sustainable and inclusive design; is it positively prepared, justified, effective, consistent with national policy and in general conformity with the London Plan? Responses should specifically address the following:

- a) Is the policy wording consistent with Policy ECC01 in terms of sustainability and the approach to impacts on climate change?

**Yes. Policy CDH02 requires that an application meets the requirements of Policy ECC01 while Policy ECC01 c) requires that the requirements of CDH02 are met. This is to ensure that the two policies are read together from both a design and technical perspective in order to achieve net zero carbon as well as ensure that all new built development in Barnet is constructed to high environmental standards.**

- b) Are the policy requirements that seek accordance with a forthcoming SPD justified, consistent with national policy and in general conformity with the London Plan?

**The SPD will provide further guidance to support policy implementation. It is not the intention of the SPD to create new policy. The SPD will meet the requirements of Section 8 the Town and Country Planning (Local Planning) (England) Regulations 2012 [LP\_LEG\_02]. The Local Plan policy is in conformity with national and London Plan policy therefore the SPD guidance**

***will also be in conformity. The SPD will provide guidance on how developments can promote environmental standards. SPDs provide a more flexible vehicle, than plan policies, for responding to changing regulations and new design good practice with regards to the management of climate change impact as well as the minimisation of the impacts of development on the environment.***

- c) Is the requirement to provide an inclusive design statement justified, would it be proportionate for such a statement to be sought from all development proposals and would the associated principles for those statements be effective?

***Yes, it is justified. The requirement for the provision of an Inclusive Design Statement as part of the Design and Access Statement reflects London Plan Policy D5 – Inclusive Design. Para 6.14.2 of the Local Plan signposts this and other appropriate guidance.***

- d) Are the specific requirements for all developments to meet Building Regulation M4(2) ‘accessible and adaptable dwellings’ and all major developments required to provide 10% of new units as Building Regulation M4(3) ‘wheelchair user dwellings’ justified by necessary evidence and have they been included in viability testing?

***This is a London Plan requirement of all London boroughs as set out in London Plan Policy D7 – Accessible Housing. Therefore the Council is not required to provide a local justification. These are standard requirements introduced by London Plan policies and are now engrained in the London development market. The Council confirms that this requirement has been factored into viability testing as set out in para 4.20 of the Local Plan Viability Assessment (Core\_Gen\_01).***

- e) Are the Council’s relevant proposed modifications necessary for soundness in terms of clarifying the requirements for energy masterplans/energy assessments and to refine the effectiveness of various policy criteria, including flexibility for circumstances where M4(2) and M4(3) standards may not be achievable?

***Yes. The Mayor of London has recently updated and clarified his guidance on the Energy Assessments (EB\_GI\_43). This follows changes to Part L of the Building Regulations (LP\_LEG\_13). Proposed Modification (MM144) ensures consistency with these changes. Part M of the Building Regulations (LP\_LEG\_14) relates to access of buildings. Proposed Modification (MM142) has been made to ensure consistency with the Regulations and Policy D7 and supporting text of the London Plan. This was requested through a representation to the Reg 19 consultation by the Mayor of London [ID\_055].***

- f) Would any further changes to the policy or its supporting text, including the Council’s other proposed modifications, be necessary to achieve soundness?

**No.**

3) Policy CDH03 relates specifically to public realm, in that regard:

- a) Is the policy approach in general conformity with the expectations of Policies D8 and T2 of the London Plan?

**Yes, it is. If it was not in general conformity the Council would have expected the Mayor to raise this as an issue of non general conformity. Policy CDH03 signposts the Mayor's priorities in terms of Legible London (the citywide wayfinding system operated by TfL), the Public London Charter (Policy D8) and Healthy Street Indicators (Policy T2).**

- b) Are the policy requirements of development proposals sufficiently clear and effective, so it is evident how a decision maker should react, particularly with respect to the London Plan's Healthy Street Indicators, the Secured by Design Resilient Design Tool and how 'a family and young people friendly environment' would be assessed?

**Yes. The Council considers that Policy CDH03 provides clear and effective signposting for decision makers.**

- c) Is the requirement seeking appropriate management of publicly accessible private space in accordance with the Public London Charter, Council town centre strategies and public realm design frameworks; justified, effective and consistent with national policy?

**Yes. As highlighted in Local Plan para 6.17.4 the Mayor's Public London Charter (EB\_DH\_14) sets out the rights and responsibilities for users and owners of public spaces, regardless of whether they are public or private. Following public consultation this was adopted by the Mayor in February 2022. If the Charter was inconsistent with national policy, the Secretary of State would have intervened. The Charter will help set the parameters for further work by the Council on public realm frameworks and town centre strategies.**

- d) Are the circumstances where the incorporation of high quality public art would be appropriate, made sufficiently clear to be effective?

**Yes. The Council considers that it is sufficiently clear and provides the flexible basis for individual proposals to provide high quality public art.**

- e) Would any other changes to the policy or its supporting text be necessary to achieve soundness?

**No.**

4) Policy CDH04 seeks to provide an approach to tall buildings in strategic locations, is it positively prepared, justified, effective, consistent with national policy and in general

conformity with the London Plan in those respects? Responses should address the following:

- a) Is the overall policy approach consistent with the expectations of Policies H1 and D9 of the London Plan in terms of identification of locations for tall buildings and optimising housing delivery in PTAL3 to 6 locations or within 800m distance of a station or town centre boundary, and the Framework insofar as it seeks to achieve well-designed places?

***Yes. The Council refers to its response to Matter 2 Q16 with regards to the Plan's consistency with London Plan Policy H1. Policy CDH04 is clear in identifying strategic locations that may be suitable for tall or very tall buildings. This is consistent with London Plan Policy D9 (B) – Tall Buildings. The Plan's approach is in general conformity with the London Plan. The Council refers to the Statement of Common Ground (SoCG) with the GLA (EB\_SoCG\_10) and the Statement of General Conformity with the London Plan (Core\_Gen\_06).***

***Section 3.2 of the SoCG addresses tall buildings. It acknowledges the Mayor's request that the Council set appropriate heights for Tall Buildings (and Very Tall Buildings of 15 storeys or more) in line with London Plan Policy D9 (B)(2). Rather than setting maximum heights for tall buildings in locations identified where tall buildings may be an appropriate form of development, the Council's view is that a design led approach that takes full account of the local context and cumulative impacts will help to shape proposals, (including building heights), for Very Tall Buildings is the most appropriate way to address this. This specific issue remains a matter of disagreement between the GLA and LB Barnet.***

***Taking a plan led approach supporting development that makes efficient use of land and takes into account the context of an area and the importance of securing well-designed, attractive and healthy places (NPPF para 124) underpins the criteria listed in Policy CDH04.***

- b) Is the identification of the strategic locations listed in the policy where 'tall' buildings (defined as 8 to 14 storeys or 26 to 46 metres) are appropriate, informed and justified by robust evidence, and are the locations sufficiently precise?

***Yes. The Council refers to its response to Q4a. The Local Plan's approach to locations is consistent with London Plan Policy D9(B).***

***The Local Plan's approach defining locations where very tall buildings may be acceptable has been strengthened by Proposed Modification (MM162) which clarifies that tall buildings would only be supported on Major Thoroughfares, and within the town centres of Finchley Central and North Finchley, in***

**proposal sites that are allocated in Annex 1. This change helps to better define and differentiate these locations (which are not Growth Areas).**

- c) Are there any other locations where evidence suggests that 'tall' buildings may be suitable and if so, should these be reflected in the policy?

**No. The Local Plan through the Tall Buildings Study Update (EB\_DH\_04) has identified the most appropriate strategic locations where there is potential for tall buildings. The Study investigated the potential opportunity for tall buildings development, considering existing and approved development to identify suitable locations and indicative heights that may be appropriate in these areas. Policy CDH04 identifies Growth Areas together with the West Hendon Estate, New Southgate Opportunity Area and selected locations (within the Major Thoroughfares of Edgware Road and Great North Road as well as the Town Centres of Finchley Central and North Finchley) as places where tall buildings may be appropriate.**

- d) Would the policy approach be consistent with and support the delivery of the specific strategic requirements of Policies GSS01 to GSS12 and the density expectations and site capacities of the proposed site allocations identified in Annex 1 of the Plan?

**Yes. Tall Buildings and Very Tall Buildings are not the Council's preferred model for delivering higher densities and maximising brownfield sites. The proposals in Annex 1 do not require the delivery of tall buildings in the strategic locations as the specific design response to delivering higher densities. These locations may however, subject to more detailed design work in response to the criteria in CDH04, be appropriate for a tall building.**

- e) Is there sufficient evidence to support the approach to 'very tall' buildings of 15 storeys or more and if so, why are exceptional circumstances required to be demonstrated rather than the identification of specific suitable locations?

**Yes. The Tall Buildings Study Update (EB\_DH\_04) highlights that in the last decade new tall buildings have become more of a feature of Barnet's townscape. Recognising existing height and context across the Borough, it was considered that buildings over 14 storeys should be classified as 'Very Tall'. The new definition recognises local variation and application to ensure that proposals for delivering tall buildings are located in the right place and at an appropriate height have regard to context and cumulative visual and environmental impacts. CDH04b) has identified the strategic locations where Very Tall Buildings may be located. Proposed Modification (MM163) clarifies that Very Tall Buildings are not acceptable outside of an Opportunity Area or a Growth Area identified in Policy CDH04a).**

- f) Why would 'appropriate siting in an Opportunity Area or Growth Area' constitute exceptional circumstances?

***As highlighted above the Council considers that Tall Buildings and Very Tall Buildings are not the Council's preferred model for delivering higher densities and maximising the use of brownfield sites. It is therefore justified in restricting through the Local Plan the strategic locations where Very Tall Buildings may be appropriate. Location alone is not an exceptional circumstance. Criteria for assessing any proposal for a tall building is clearly set out in CDH04 and further supported by MM163.***

- g) Are the policy requirements which defer specific parameters for tall and very tall buildings in identified strategic locations to the preparation of and compliance with a Building Heights SPD; positively prepared, justified, effective, consistent with national policy and in general conformity with the London Plan?

***Yes. The Council refers to Proposed Modification (MM165) which provides clarification on the role of the Designing for Density SPD (formerly known as Building Heights). The SPD is not setting parameters for Tall and Very Tall buildings. This has been agreed in SoCG with Historic England (EB\_SoCG\_11) and the GLA (EB\_SoCG\_10).***

- h) Is the policy approach insofar as it relates to heritage assets and their settings, consistent with relevant statutory duties and associated national policy seeking to conserve and enhance the historic environment?

***Yes. The Council refers to the SoCG with Historic England (EB\_SoCG\_11), in particular Section 3 which sets out in detail the Local Plan's approach to tall buildings. Section 3 also sets out Proposed Modifications – published as MM149, MM150, MM163 and MM165.***

- i) Would the individual requirements of development proposals result in a design-led approach and are they sufficiently clear and effective, when taken together, so it is evident how a decision maker should react to development proposals?

***Yes. Policy CDH04 is one of the most detailed policies in the Local Plan and very clearly (with incorporation of MM161 to MM169) sets out the locations where such proposals for Tall and Very Tall Buildings may be appropriate and the criteria for assessing such proposals.***

- j) The Council's proposed modifications, include changes to Map 4 of the Plan and seek to reinforce the need for careful consideration of heritage assets. Why are such changes necessary for soundness and would they require any consequential modifications to the policy, its supporting text or other parts of the Plan?

***The Council considers that the Proposed Modifications (MM161 to MM169) help improve the soundness of Policy CDH04. The proposed revisions to Map***

**4 serve to better identify the viewing points and vistas for the four locally important views defined in the Local Plan.**

- k) Would any other changes to the policy or its supporting text, including the Council's proposed modifications relating to character and appearance and fire safety considerations, be necessary to achieve soundness?

**The Council has no further modifications to propose.**

- 5) Policy CDH05 provides a specific approach for extensions to properties and Policy CDH06 relates to proposals for basements. In those regards:

- a) Are the requirements of development proposals justified, sufficiently clear and effective, so it is evident how a decision maker should react to relevant proposals for residential and non-residential developments?

**Yes. Both policies operate with due regard to the extensive remit of the General Permitted Development Order (LP\_LEG\_11) and help to highlight key considerations for both extension and basement development that require planning permission. Development Management colleagues have had a significant input to the formulation of both of these bespoke policies.**

- b) Is it justified that extensions and basements 'be subordinate to the existing building' and is this consistent with national policy insofar as achieving well-designed places?

**Given the negative contribution of permitted development rights to well-designed places it is appropriate that the local planning authority set out some form of policy on extensions and basements that respects character and local context.**

- c) How would an 'acceptable' outlook and 'adequate' spacing between surrounding buildings be demonstrated for the purposes of Policy CDH05?

**This is a question of context and local character as explained in para 6.19.3. There is an expectation of the decision maker to determine each application on its merits. Further support and guidance would be provided through the forthcoming Sustainable Design and Development Guidance SPD which replaces existing SPDs on Residential Design Guidance (EB\_DH\_03) and Sustainable Design and Construction (EB\_DH\_02). The Council refers to Proposed Modifications (EXAM 4) (MM170) and (MM174).**

- d) Is it necessary that there are two separate policy requirements relating to amenity space in parts e) and k) of Policy CDH05 and should the policies seek only compliance with Policy CDH07?

**No. The Council agrees that through a Proposed Modification CDH05 e) should now be deleted particularly since the clarification provided by MM171 was published. This would improve the messaging on Extensions.**



- e) Are the requirements relating to basement proposals in Policy CDH06, justified, effective and consistent with national policy, insofar as seeking to ensure not more than 50% of amenity space is removed; that all habitable rooms provide a minimum headroom of 2.5 metres; and by excluding basements from Flood Zone 3B?

**Yes. Flood Zone 3b denotes a functional flood plain, where there is a higher risk of flood that could put lives at risk. NPPG (para 064 Table 2) (Core\_Gen\_34) lists basement dwellings as highly vulnerable due to their higher risk of inundation. While not all applications for a basement would result in a separate dwelling, the Council could not prevent them from being used for sleeping accommodation.**

- f) Are the requirements to be 'in accordance' with SPDs justified and consistent with national policy?

**Yes. The NPPF (Core\_Gen\_34) para 129 highlights that SPDs can be used to provide further guidance for particular issues, such as design. The policy as proposed to be modified (MM172 refers) stipulates that proposals for basements should (as opposed to must) follow good design principles in accordance with the Sustainable Design and Development SPD. Given the frequency with which the Government changes permitted development rights they are an appropriate and flexible tool for delivering good design in Barnet.**

- g) Would any changes to the policies or their supporting text, including the Council's proposed modifications, be necessary to achieve soundness?

**Yes, the proposed modifications to Policy CDH06 will help improve soundness. The Council highlights that extensions to buildings are one of the most common forms of development in the Borough and that the bespoke Local Plan policy on Extensions has generated no representations at Reg 19 stage.**

- 6) Policy CDH07 provides a specific approach to amenity space and landscaping, in that regard:

- a) Are the amenity space standards set out in Table 11 justified and should the flexibility suggested in paragraph 6.21.3 be reflected in the policy wording for effectiveness?

**CDH07 reflects that the Council wants to provide good living conditions for the future occupiers of new homes. Flexibility on the application of the policy is therefore best expressed in the supporting text.**

- b) Is the approach to play space in general conformity with the expectations of Policy S4 of the London Plan and is the requirement for accordance with the Mayor's SPG consistent with national policy?

**Yes. Policy CDH 07 requires that the play spaces are delivered in accordance with Policy S4 of the London Plan so the Local Plan policy is in general conformity with the London Plan policy. The London Plan (Core\_Gen\_16) is considered to in conformity with national policy.**

- c) How would contributions to off-site provision be calculated for amenity and play space, have they been subject to viability testing and would they otherwise be in accordance with national policy?

**The requirements for amenity space are for this to be provided on site. Therefore it should be designed into the scheme. This is supported by the Viability Assessment (Core\_Gen\_01). In those circumstances where a proposal cannot deliver the requirements of CDH07 for amenity space and play space the Council considers that the viability will have improved. Off-site contributions do not require viability testing in such circumstances.**

- d) Are the individual requirements to include hard and soft landscaping relevant to and would they be achievable by all development proposals?

**Landscaping is an important material consideration and an integral part of development proposal. The Local Plan does not require both hard and soft landscaping from proposals. However, it is acknowledged that the wording of CDH07b) could be interpreted as individual requirements for hard and soft landscaping. The Council will clarify this through a proposed modification to CDH07b) to state that 'where developments include hard and/or soft landscaping the proposals must ensure that:'**

- e) Is the approach to biodiversity net gain in accordance with Policy ECC06, and otherwise effective, consistent with national policy and in general conformity with the London Plan?

**Yes. CDH07 and ECC06 are consistent with national policy, with Proposed Modifications (MM279—MM285) strengthening the consistency. The Environment Act (LP\_LEG\_06) has gained Royal Assent since the London Plan. Policy G6 was adopted so Biodiversity Net Gain is not required in the same absolute terms by the London Plan as expressed in the new legislation. Local Plan policies CDH07 b(iii) and ECC06 are therefore in general conformity with the London Plan policy but are also directly linked to the Biodiversity Net Gain requirements set out in Schedule 14 of the Environment Act 2021.**

- f) Is the policy requirement for development proposals to provide sustainable drainage systems justified and sufficiently clear to be effective?

**Yes. Paras 6.22.5 - 6.22.7 and clause b (v) of Policy CDH07 set out the justification and requirement for sustainable drainage the SPD will provide the guidance and detail on how to achieve effective sustainable drainage. This has not been included in the policy due to the level of detail on design options, preferred materials and possible planting regimes, along with**

**diagrams that sustainable drainage guidance entails. The Council will propose a further (minor) modification deleting urban in CDH07 v) and also para 6.22.6 by using the abbreviation SuDS.**

- g) Does the policy have sufficient emphasis on trees and tree-lined streets to ensure consistency with national policy?

**The Council considers that the wording of both policy CDH07 and supporting text could be improved to ensure greater consistency with national policy in particular NPPF para 131. The Council will clarify this through a proposed modification.**

- h) Are there any requirements included in the supporting text that are justified and should otherwise be included in the policy wording for effectiveness?

**No.**

- i) Would any changes to the policy or its supporting text, including the Council's proposed modifications, be necessary to achieve soundness?

**The Council refers to its responses to Q6d and g. It considers that these additional proposed modifications will help improve soundness.**

- 7) Policy CDH08 relates to Barnet's Heritage. Are its approaches, positively prepared, justified, effective, consistent with national policy and in general conformity with the London Plan? Responses should address the following:

- a) Whether the approach is consistent with national policy which seeks to conserve and enhance the historic environment; particularly in respect of the approaches to proposals affecting heritage assets, the significance of heritage assets, substantial or less than substantial harm, and heritage at risk?

**Subject to the proposed modification outlined at Q7b the Council considers that Policy CDH08 is consistent with the NPPF. This is reflected in the SoCG (EB\_SOCG\_11) with Historic England.**

- b) Is any duplication or departure from national policy with respect to the range of designated heritage assets or non-designated assets (including those of archaeological interest) covered in the policy; necessary and justified?

**The Council acknowledges that there is an error within the Proposed Modifications (MM181) in terms of the introduction of the word 'wholly' exceptional when referring to all designated heritage assets. This is not consistent with the NPPF wording (para 200b), where it only applies to assets of the highest significance, in Barnet's case notably Grade I and II\* listed buildings and Registered Parks and Gardens. The Council will propose a modification to ensure that 'substantial harm to, or loss of designated heritage assets should be exceptional and will not be permitted unless it can be demonstrated that substantial public benefits will be achieved that**

***outweigh such harm or loss. Substantial harm to, or loss of assets of the highest significance should be wholly exceptional.***

- c) Notwithstanding the above, are the policy requirements, justified, sufficiently clear and effective, so it is evident how a decision maker should react to relevant development proposals and their influence upon the different types of designated and non-designated heritage assets and their settings (where appropriate)?

***Yes. The Council considers that Policy CDH08 is reflective of the relevant statute and NPPF and PPG. The policy sets out a helpful understanding of the Borough's current position in relation to the historic environment.***

- d) Is the list of designated and non-designated assets in Table 12 intended to be comprehensive and are each of the sub-categories justified by proportionate evidence?

***Yes. Table 12 provides a comprehensive list of Barnet's heritage assets based on the 2020 Local Heritage List (EB\_DH\_06). Subject to formal approval of additions through the 2021 Local Heritage List (EB\_DH\_06) the number of entries for locally listed buildings will be updated.***

- e) Are any modifications to the Plan required to reflect boundary changes to heritage assets and are there any other designated or non-designated assets which should be added to Table 12?

***No. The Council proposes to make a modification to Table 12 with respect to the historic park and garden at Avenue House. This is now known as Stephens House and Gardens. Subject to the approval of the Local Heritage List there will be an increase in the number of locally listed buildings.***

- f) Would any other changes to the policy or its supporting text, including the Council's proposed modifications, be necessary to achieve soundness?

***The Council considers that in addition to the correction outlined at Q7b that there are merits in making a Proposed Modification to CDH08. This Policy could be made clearer by merging Locally Listed Buildings and Other Non-Designated Heritage Assets under one sub-heading.***

- 8) Policy CDH09 sets out the approach to advertisements, in that respect:

- a) Is the policy approach consistent with the Town and Country Planning (Control of Advertisements) (England) Regulations 2007 and national policy insofar as advertisements should be subject to control only in the interests of amenity and public safety, taking account of cumulative impacts?

***Policy CDH09 applies to all advertisements requiring advertisement consent under the Town and Country Planning (Control of Advertisements) (England)***

***Regulations 2007 (LP\_LEG\_17). This consent process is clearly set out in para 6.34.7 of the Local Plan.***

- b) In the context of the above, are the requirements of development proposals; justified, sufficiently clear and effective, so it is evident how a decision maker should react to proposals for advertisements?

***Yes.***

- c) Are there requirements included in the supporting text that are justified and should otherwise be included in the policy wording for effectiveness?

***The policy is appropriately worded within the parameters of the 2007 Regulations.***

- d) Would any other changes to the policy or its supporting text, including the Council's proposed modifications relating to proximity to the Strategic Road Network and consultation with National Highways and specifically relating to estate agent boards, be necessary to achieve soundness?

***No.***