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SENT VIA EMAIL

30652/A3/GW/DM/sl
25th April 2023

Dear Sir / Madam,

REPRESENTATIONS ON BEHALF OF ROPEMAKER PROPERTIES LIMITED TO THE LONDON BOROUGH OF BARNET LOCAL PLAN REVIEW - EXAMINATION DOCUMENTS

Barton Willmore now Stantec are instructed to make representations to the Examination Documents published by London Borough of Barnet in relation to the Local Plan Review on behalf of our client, Ropemaker Properties Limited.

Representations have previously been submitted on behalf of Ropemaker Properties Limited to the Council's Regulation 19 Local Plan consultation and the Examination Hearings. Our client welcomes the opportunity to provide comment on the additional examination documents prepared by the Council in order to address the Inspector's Action Lists.

Context

Ropemaker Properties is the freehold owner of the Garrick Road Industrial Estate (GRIE) as defined in the Site Location Plan provided at **Appendix 1**. The GRIE occupies 6ha of land and forms the majority part of the locally designated Garrick Industrial Centre and Connaught Business Centre Locally Significant Industrial Site (LSIS).

The GRIE is made up of 26 industrial units providing approximately 35,000sqm floorspace in Class E(g)(iii), B2 and B8 uses.

The GRIE has a public transport accessibility level (PTAL) of part-3 / part-2 / part-1 and this is not projected to change up to 2031. The closest stations are Hendon train station (Thameslink), located approximately 300m south-east of the Site, and Hendon Central underground station (Northern line), located approximately 900m east of the Site. Bus stops are located along the A5, to the west of the Site, providing regular services including to Alperton, Pinner, Watford, Brent Cross and Kilburn. The Site is also well connected to the local and strategic highway network, including to the A5, M1, Watford Way and North Circular.

The West London Orbital (WLO) is a major infrastructure project which will deliver a passenger service along existing rail tracks between Hounslow/Kew Bridge and Hendon/West Hampstead by

2029 at the earliest. To our knowledge, the forecast PTAL rating does not factor in the planned WLO railway service which will further improve local public transport accessibility; in our view this is an instance where the PTAL methodology provides a misleading impression of the ability to use public transport to access workplaces, shops and services.

Representations

Notes on Employment and Industrial Land (EXAM 26, 74 and 76)

Policy ECY01 "A Vibrant Local Economy" states at part g "*Where co-location of residential uses is proposed in an LSIS the development should be employment led and the Agent of Change Principle used in favour of existing and proposed employment uses. The introduction of residential uses into an LSIS should not prejudice its ability function as an industrial area*".

Policy E7 of the London Plan "Industrial Intensification, Co-Location and Substitution" requires Development Plans to be "*proactive*" and consider where parts of LSIS can be intensified, consolidated and co-located with residential and other uses.

The requirement for co-location development to be "employment led" within Policy ECY01 should be amended as co-location may incorporate more residential floorspace whilst providing no net loss of industrial floorspace. The inclusion of "employment-led" is not considered to be in accordance with Policy E7 of the London Plan, which requires that development provide equivalent industrial floorspace only.

Whilst the current wording of Policy ECY01 implies co-location schemes can come forward, there is no information provided and no allocations identifying where co-location schemes should come forward within Barnet, as encouraged by London Plan Policy E7. It is requested that existing industrial sites that are considered suitable for co-location of industrial uses with residential are identified through the Local Plan at Policy ECY01. The proposed changes in EXAM 76 do not address this.

GRIE is a designated LSIS and is sustainably located within 400m of Hendon station, which will be served by the WLO major infrastructure project, and within 900m of Hendon town centre. WLO stations, including Hendon, are supported for intensification to provide 950 homes through Policies GSS01 and GSS09 of the submission Plan. NPPF Chapter 11 and London Plan Policy GG2 support making the best use of and optimising previously developed land for new homes, especially where they are sustainably located and provide access to services and amenities by public transport, walking and cycling.

Therefore, it is considered the GRIE is a suitable development site to provide co-location of industrial uses with residential, in accordance with sustainable development principles within the NPPF and London Plan, London Plan Policy E7 and to support the delivery of other Local Plan policies including Policies GSS01 and GSS09. However, if the GRIE site cannot be allocated at this stage, it should be made clear that a co-location scheme can come forward through a future Supplementary Planning Document or a comprehensive advance or parallel masterplan in collaboration with Barnet and the GLA, in accordance with part B of London Plan Policy E7 and the Industrial Intensification and Co-Location Through Plan-Led and Masterplan Approaches Practice Note (2018).

We note the clarification of LSIS areas in EXAM 74 and welcome this update.

Note on Housing Numbers (EXAM 36)

Our client strongly supports the intensification of uses around WLO stations, including Hendon, for 950 homes, as set out within Policy GSS01 "Delivering Sustainable Growth" and GSS09 "Existing and Major New Transport Infrastructure"; this is a key part of the Local Plan strategy and agreed

with Transport for London Spatial Planning within the Statement of Common Ground (ref. EB_SoCG_12) at paragraphs 3.1 to 3.3. However, at the Hearing we raised the issue that Policies GSS01 and GSS09 provide no information or proposed allocations identifying where the 950 homes will be located around these WLO stations, including Hendon.

The Inspector's Actions List required a note to address how housing numbers have been arrived at and how it contributes towards overall position, including site allocations and other sources not proposed as allocations but are intended to contribute. The Note on Housing Numbers (EXAM 36), prepared by the Council, provides no further information on how or where the 950 homes at WLO stations will be delivered. Out of the three WLO stations (Cricklewood, Hendon and Brent Cross), Cricklewood and Brent Cross are already Special Policy Areas with defined housing requirements and therefore the only suitable WLO station to deliver the 950 homes is Hendon. Yet there is no assessment or consideration of what sites could come forward around Hendon station, including no site allocations for housing delivery.

We are now aware that through EXAM 90 that it is intended to remove reference to the allocation of 950 homes at WLO stations. This is not considered reflective of Policy GSS01 and the wider strategy of the submission Local Plan, or in accordance with the agreed position with TFL.

Note on Tall Buildings (EXAM 79)

Our client maintains their position in that the current wording of Policy CDH04 "Tall Buildings" and associated policy map designations do not include all the areas in which development is to be directed, including in areas within proximity to Hendon WLO station, as set out within Policies GSS01 and GSS09.

The WLO stations of Brent Cross and Cricklewood are supported for tall buildings through individual policies for growth. However, the current wording of Policy CDH04 does not support tall buildings at Hendon WLO station and therefore does not reflect the aspiration for growth and development for 950 homes at WLO stations as set out within Policies GSS01 and GSS09.

Map 4 of the submission Local Plan identifies existing tall buildings through black dots and strategic tall building locations through red circles. The exact locations of existing tall buildings and strategic tall building locations are unclear through Map 4, and it is considered that GRIE should be located within a strategic tall building location due to its surrounding (tall building) context, its locations adjacent to an existing railway line and lack of site constraints.

A number of tall buildings have been consented along Edgware Road Major Thoroughfare, in close proximity of GRIE, including Silk Park development (ref. 18/4661/FUL) for up to 28-storeys, Telephone Exchange development (reg. 18/0352/FUL) for up to 17-storeys and former Homebase site (ref. H/05828/F14) for up to 14-storeys. The changing context in relation to townscape and height, scale and massing surrounding the GRIE provides opportunity for tall buildings to be suitable in this location and assist in the delivery of growth at WLO stations to meet policy aspirations.

Therefore, it is considered that the strategic tall building locations should be further considered in relation to enabling growth and high-density development at Hendon WLO station to deliver other Local Plan policy considerations, specifically Policies GSS01 and GSS09. Failure to do so may result in housing delivery not being met and the Local Plan being unsound.

Where the GRIE is not included within a strategic tall building location, Policy CDH04 of the submission Local Plan should be clear in that tall buildings are not restricted to strategic tall building locations and that tall and very tall buildings may be justified outside of strategic tall building locations where they meet the requirements of Policy D9 of the London Plan, in accordance with the High Court case London Borough of Hillingdon v Mayor of London [2021].

Note on Delivering the Identified Requirements over the Plan Period (Housing and Employment)
(EXAM 90)

The removal of the allocation for 950 homes at WLO stations is a significant proposed amendment and is not something that should be considered through minor modifications to the submission Local Plan. The strategy of the Local Plan is based on a housing distribution to various growth areas and areas where infrastructure improvements will provide opportunities for housing intensification.

The removal of the allocation as proposed via EXAM 90 is not supported by our client. If the strategy for the Local Plan remains the same, housing should be identified at WLO stations to provide opportunities for more housing in these sustainable locations, especially at Hendon station, in accordance with Policy GG2 and H1 of the London Plan and paragraph 120 of the NPPF.

Next Steps

Our client is keen to work proactively with the Council to update the Local Plan as per the representations above. We are very happy to arrange a meeting to discuss Officers' responses to these representations and how our client can assist.

Yours faithfully,



GRAEME WARRINER
Planning Director


Appendix 1 – Garrick Road Industrial Estate Site Location Plan

TOWN PLANNING
MASTERPLANNING & URBAN DESIGN
ARCHITECTURE
LANDSCAPE PLANNING & DESIGN
SUSTAINABLE VALUE

INFRASTRUCTURE & ENVIRONMENTAL PLANNING
HERITAGE
GRAPHIC COMMUNICATION
COMMUNICATIONS & ENGAGEMENT
DEVELOPMENT ECONOMICS

This product is printed
on stock and in a process
that conforms to the PEFC
standards for sustainably
managed forests.

Garrick Road Industrial Estate (GRIE) Site

 Land owned by Ropemaker
(5.86 hectares/ 14.48 acres)

