

Ropemaker Properties Ltd

Barnet Local Plan Examination

Matter 4: Planning for the Borough's economy,  
including employment, retail and other main  
town centre uses

Prepared on behalf of Ropemaker Properties Ltd

August 2022

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## 1.0 INTRODUCTION

- 1.1 We act on behalf of Ropemaker Properties Ltd ("Ropemaker"). Ropemaker is the freehold owner of the Garrick Road Industrial Estate (GRIE) as defined in the Site Location Plan provided at **Appendix 1**. As such, Ropemaker has a strong interest in the formulation of local planning policy and its effective implementation.
- 1.2 Ropemaker have monitored and engaged with the Local Plan Process, having made representations in respect of both the Regulation 18 and 19 consultations.
- 1.3 Having reviewed the latest draft documents, Ropemaker have several questions and comments which have yet to be addressed. As such Ropemaker will be participating in the relevant examination hearings.
- 1.4 This Statement relates to **Matter 4: Planning for the Borough's economy, including employment, retail and other main town centre uses.**

## 2.0 BACKGROUND

- 2.1 Ropemaker Properties Ltd is the freehold owner of the Garrick Road Industrial Estate (GRIE) as defined in the Site Location Plan provided at **Appendix 1**. The Site forms the sole focus of our observations and comments made in respect of the Local Plan Review.
- 2.2 The GRIE occupies 2.3 hectares of land located to the west of the Midland Main Line railway and less than 200 m from Hendon railway station. Garrick Road connects directly to the A5 along Edgware Road. The draft BLP currently identifies the GRIE site area as 7.4 ha. This is incorrect and should be amended.
- 2.3 The GRIE is subject to a non-strategic land use designation under the adopted Local Plan. It forms the majority (over 80%) of the Garrick Industrial Centre and Connaught Business Centre LSIS (total area of 2.8 ha). This LSIS is the largest in the Borough.
- 2.4 The GRIE (2.3 ha) forms the second largest parcel of land falling within the 11 'Locally Significant Industrial Sites, Industrial Business Parks and Business Locations' identified in the adopted Local Plan. The largest is the North London Business Park where 2.6 ha is designated as an 'Industrial Business Park'. The North London Business Park is now subject to a recent planning permission involving comprehensive redevelopment which was granted at planning appeal by the Secretary of State (Barnet ref: 15/07932/OUT, PINS ref: APP/N5090/W/17/3189843) for circa 1,000 homes and a series of other uses, including a new secondary school. That appeal scheme had been recommended for approval by Officers. The Council published a North London Planning Business Park planning brief in 2016.
- 2.5 The GRIE is located close to a series of committed and potential development sites where new homes and new floorspace can or will be delivered to help achieve the draft BLP's key policy objectives.
- 2.6 The key potential development site close to the GRIE is the 'Silk Park' proposals at the Sainsbury's foodstore site. Here the Council's Planning Committee resolved to grant planning permission for 1,309 homes and a new Sainsbury's foodstore across buildings measuring up to 28 storeys (Barnet ref: 19/4661/FUL).
- 2.7 The Silk Park proposals include an allowance made for a 'landing point' for a bridge which would cross Silk Stream into the GRIE. In agreeing this with the applicant, the Council was self-evidently considering a scenario in which the GRIE comes forward for a form of comprehensive redevelopment. In no other scenario would a bridge be necessary to make a development acceptable in planning terms.

### 3.0 EXAMINATION ISSUES

- 3.1 Our case in relation to this Matter is consistent with the submissions made on behalf of Ropemaker to date, but also takes into account the Council's updated position as set out in the recently published topic papers.

**Issue 1:**

*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 the Borough's economy and employment?*

**Questions:**

*8) Is the approach of Policy ECY01 with respect to the employment-led focus upon co- location of industrial premises with new homes in LSIS justified and in general conformity with Policy E7 of the London Plan? Does the Plan appropriately account for circumstances where co-location of existing employment land may be proposed and there would be no net loss of employment floorspace?*

- 3.2 We do not consider the approach of Policy ECY01 to be justified nor do we consider it to be in conformity with London Plan Policy E7 for two main reasons, (1) the lack of clarity regarding in-principle support for co-location schemes (i.e. failure to identify opportunities), and (2) the requirement for development to be 'employment-led'. These issues are set out in our response to Matter 1 Q23 but for completeness:

- Policy E7 of the London Plan requires Development Plans to be proactive and encourage the intensification of business uses in Use Classes B1c, B2 and B8 and (through Part B) consider whether certain SIL or LSIS sites could be intensified to provide additional industrial capacity as well as support the delivery of residential and other uses.
- However, Policy ECY01 fails to proactively identify and promote the intensification of existing LSIS sites to deliver the London Plan support for co-location of employment and residential use. It instead includes part (g) that acknowledges co-location proposals could come forward subject to certain criteria. This is impossible however under Policy E7 of the London Plan as schemes can't subsequently come forward as ad hoc proposals. Policy ECY01 therefore prejudices the delivery of London Plan Policy E7.
- Secondly, Policy ECY01 part (g) places a requirement on co-location schemes within LSIS to be 'employment-led'. This is defined by footnote 38 as:

*'An employment led development is one where the employment generating (as defined by ECY01) floorspace is greater in proportion to the other uses proposed on the site'.*

- Whilst the objective must always be to prioritise employment uses within LSIS, the 'employment-led' definition does not allow for circumstances whereby an LSIS site can accommodate enhanced employment provision (either through quality improvements and/or increased floorspace) as well as maximising other uses (i.e. residential use in proximity to major transport infrastructure) and in doing so, the residential element might be proportionally greater overall.
  - Policy ECY01 is therefore also inconsistent with London Plan Policy E7 as Policy E7 does not require co-location schemes to be 'employment led'. Paragraph 6.7.1 of the London Plan is clear that co-location proposals are encouraged to explore the potential to intensify industrial activities, but this is not the same as 'employment led' and would not prevent other uses on LSIS sites from being proportionally greater overall where intensification of employment use also occurred.
- 3.3 The Council's application of the Agent of Change principle is also inconsistent with the London Plan. Paragraph 9.7.6 of the BLP misunderstands the principle of Agent of Change and concludes that London Plan D13 requires applications for co-location in a LSIS must be employment led. This is incorrect and not consistent with the London Plan as a result.
- 3.4 Against this background, Policy ECY01 should be amended to promote and clearly support a review of LSIS locations and their potential for redevelopment through a co-location scheme.
- 3.5 Whilst the objective must always be to prioritise employment uses, co-location development would not undermine the strategic significance of a site for employment uses, assuming that the developed scheme provided a level of employment floorspace which was commensurate with the existing site and any reasonably anticipated growth. There should be a provision within the policy to allow for such an eventuality, in order to maximise the potential of sites with co-location potential, and to not unduly restrict opportunities.
- 3.6 Our second point is that Policy ECY01 and the supporting text (specifically Paragraph 9.7.6 and the 'Agent of Change' glossary definition) should be amended so that the application of this principle is more consistent with the definition set out within the London Plan. In our view, the current application of this principle is incorrect. For example, Paragraph 9.7.6 misunderstands the Agent of Change principle, which is directed towards new residential development in proximity to nuisance-generating uses (to be retained), whereas co-location provides the ability to redevelop sites in a manner where uses can co-exist and be designed on that basis. The Agent of Change is not therefore a reason why any application for co-location in an LSIS must be employment led.

## **APPENDIX 1 – GRIE SITE LOCATION PLAN**



# Site Location Plan

- Garrick Road Industrial Estate
- LSIS
- Silk Park development
- Telephone Exchange development
- Rushgrove development
- West Hendon Estate development
- Other sites identified for potential development

