

**Barnet's Local Plan**  
**Examination in Public**  
**Technical Paper on Employment Land**  
**April 2022**

**1.0 Executive Summary**

1.1 This Technical Paper further explains and details the approach of the draft Barnet Local Plan to employment land. It summarises the evidence and links this to the policy and site proposals.

**2.0 Local Plan Approach to Employment Land**

2.1 Paragraphs 8 and 81 to 83 of the NPPF require Local Authorities (LAs) to plan proactively to meet the development needs of business and support a strong responsive and competitive economy. To achieve this LAs need to ensure that sufficient land is available, of the right type and in the right places.

2.2 The challenges of helping the local economy recover from the economic downturn as well as the impact of COVID19, identifying new economic sectors and improving opportunities for access to work are set out in the Local Plan. This includes providing workspace to help small to medium enterprises (SMEs) to thrive and optimise Barnet's strong culture of self-employment.

2.3 The Local Plan's Vision (para 3.1.1) sets out that with the benefit of this Local Plan that by 2036 'Responsive and adaptable, Barnet's town centres have recovered from the COVID19 pandemic, and thrive, with the efficient and sustainable use of their locational opportunities addressing the needs of a growing population: providing innovative business, leisure and cultural activities.' The Local Plan's Vision reflects the cross-cutting themes of Barnet's Growth Strategy (2019-2030) – in particular 'an entrepreneurial borough' and 'a borough of thriving town centres'.

2.4 A suite of key objectives (para 3.2.2) help to deliver the Local Plan Vision. Of particular relevance to Employment Land is:

- To make Barnet a place of economic growth and prosperity where space for commercial, business and service uses are fit for a post COVID19 recovery

2.5 The Local Plan delivers a strategy for meeting Barnet's employment land needs. The overarching spatial strategy in Policy BSS01 captures the aspirations for Barnet's Plan Period – 2021 to 2036 and sets out aspects of office floorspace growth including affordable workspace. This includes provision of 395,000m<sup>2</sup> of new office space in the Brent Cross Growth Area (as approved by the 2010 outline consent and an additional 67,000m<sup>2</sup> of additional office space across Barnet's town centres and Growth Areas.

- 2.6 Chapter 4 Growth and Spatial Strategy provides more detailed policies on the location of new employment floorspace within the Growth Areas, including policies GSS01 Delivering Sustainable Growth and GSS02 Brent Cross Growth Area. Employment growth could create more than 27,000 new jobs, many within the Brent Cross Growth Area assisting in delivering the conditions for sustainable growth in an integrated new Metropolitan Town Centre.
- 2.7 The Local Plan's approach to safeguarding employment land is set out in Policy ECY01 which identifies the Locally Significant Industrial Sites and Business Locations (Table 14). Policy ECY01 seeks to provide general protection for office-space and industrial sites across Barnet and sets out specific locations in terms of Locally Significant Industrial Sites and Business Locations which should be safeguarded for employment uses. This policy conforms with the requirements of paragraphs 8 and 81 to 83 of the NPPF to build a strong competitive economy.

#### Evidence

- 2.8 The documents to which this Technical Paper refers are:
- The London Office Policy Review (LOPR) (EB\_E\_05),
  - London Industrial Land Demand Study (LILDS) (EB\_E\_06),
  - West London Employment Land Review (WLELR) (EB\_E09) and
  - Barnet's Employment Land Review (BELR). (EB\_E\_04)
- 2.9 The London Office Policy Review (LOPR) highlights that the full implementation of the Brent Cross outline consent of 395,000m<sup>2</sup> of office space will create a significant employment location in Barnet, and that small office capacity is available in other Town Centres within the Borough. The London Plan 2021 Annex Town Centre Network identifies Edgware, Chipping Barnet, Church End Finchley, North Finchley and Whetstone Town Centres as having demand for existing office functions and that these should be protected.
- 2.10 Barnet's Employment Land Review (BELR) is optimistic regarding the ability of the Borough's Town Centres to retain and continue to support office based employment and this is demonstrated by examining the spread of office based firms, across the Borough in figure 4.16. The BELR also recognises that Barnet has a strong Small to Medium Enterprise (SME) base and, that there was an expanding flexible space market. Since these studies have been carried out use class E has been introduced but the council considers this has no material impact on the findings due the uses still being relevant to Barnet.
- 2.11 Through its COVID recovery programme Barnet recognises the need for small business to receive support to navigate through the current market turbulence.
- 2.12 The Industrial Land in Barnet has been assessed using two different models the London Plan evidence London Industrial Land Demand Study (LILDS) used industrial land demand across a wide variety of uses while the West London Employment Land review (WLELR) used labour demand. Both studies demonstrated that it was

important for Barnet to retain existing industrial land and where possible provide additional space for employment uses, especially B8 space.

- 2.13 The BELR focussed on where the employment land is in the Borough and provides information relating to its use and quality. The BELR and WLELR both highlight there is a lack of vacancy across the industrial land in Barnet although some of Barnet's industrial stock is relatively small and becoming dated. They also refer to the importance of this type of stock in the market, especially for small to medium sized businesses and start-ups, as they are often available at lower rents. While the pandemic has impacted on the small businesses in the LSIS sites and Town Centres, market analysis undertaken as part of the WELR indicated that there was increasing scarcity of industrial land in North London there is therefore a strong possibility that the industrial land uses will recover at a faster rate than other non-residential uses due to this scarcity in the market for industrial land.

#### London Plan

- 2.12 As a result of the LILDS study the London Plan has identified LB Barnet as needing to retain its industrial land including non- designated industrial land.
- 2.13 London Plan economy policies relating to industrial uses are:
- Policy E4 Locally Significant Industrial Sites,
  - Policy E6 Locally Significant Industrial Sites and
  - Policy E7 Industrial intensification, co-location and substitution is to intensify the use of sites.

These support intensification, especially for light industrial uses in Use Class E (g) (iii) (or B1(c)) as a means of achieving the policy aims of retaining such land uses, where the market demands it may also increase the provision within a borough.

- 2.14 The London Plan policies also support co-location of residential uses in circumstances where this would assist in achieving the retention or additional provision of light industrial uses.

#### Article 4 Protection

- 2.15 The Council protects employment locations classified as Locally Significant Industrial Sites within certain town centres and across Barnet. In 2019 it implemented an Article 4 Direction to protect existing office accommodation (formerly B1a) and light industrial processes, research and development (formerly B1c) from permitted development conversion to residential. This safeguarding has been diminished by the replacement in 2020 of Use Class B1 with Use Class E - Commercial, Business and Service Uses. The Council continues to explore options on the use of Article 4 Directions for the further safeguarding of employment land as the current directions expire 31<sup>st</sup> July 2022.

### **3.0 Site Allocations**

- 3.1 The site allocations set out in Annex 1 of the Local Plan conform with the approach of employment policies in the London Plan and draft Local Plan. Where sites identified for residential uses currently have employment uses, such as light industrial, the site guidance seeks mixed use development proposals to support and retain the Borough's economic base and employment.
- 3.2 Following the Regulation 19 consultation the Council has reconsidered the 'Proposed Uses' section of Site Proposals in Annex 1, particularly in relation the use of floorspace percentages. Through doing so the Council is seeking to express the uses more clearly and flexibly. The initial approach provided a percentage split for each site to guide development, with the concept of aiming for relatively precise guidance. The Reg 19 consultation comments received, however, indicated that the percentage approach was too restrictive and could be difficult to interpret. Following this feedback, the Council intends to modify each site by removing the reference to percentages and instead relying upon a descriptive approach. This is consistent with the approach taken by other London boroughs such as the recently adopted LB Brent Local Plan. Commercial uses will be sought as part of mixed-use development on those sites assessed as suitable.