

Chapter 10: Employment (Business & Industry)

Policy GEMP1 (Protecting employment sites)

Deposit Draft Objections

GEMP1 / 261 / 1033	Hendon Park Limited	10.1.28
GEMP1 / 263 / 1254	The Finchley Society	10.1.10
GEMP1 / 153 / 661	Tesco Stores Limited	10.1.25
GEMP1 / 287 / 2345	Barnet Regeneration	10.1.31

Support for Policy

GEMP1 / 204 / 1012	English Welsh & Scottish Railway Ltd	10.1.30
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Revised Deposit Draft Objections

GEMP1 / 327 / 5474R	Costco Wholesale UK Ltd	10.1.2
GEMP1 / 153 / 5519R	Tesco Stores Limited	10.1.2
GEMP1 / 287 / 5889R	Barnet Regeneration	10.1.31

Support for Policy Changes

GEMP1 / 286 / 5665R	Barnet Friends of the Earth	10.5
GEMP1 / 286 / 5663R	Barnet Friends of the Earth	10.1.32

Pre-Inquiry Change Objections

GEMP1 / 263 / 6928P	The Finchley Society	10.1.2
GEMP1 / 188 / 7358P	Greater London Authority	10.1.2 - 10.1.2

Issues

- The need for a definition of 'sui generis' uses;
- The levels of employment generated by retail uses;
- The status of RAF East Camp in terms of the UDP;
- The need to reflect strategic policies on freight handling and transfer by rail in the UDP;
- The usefulness of the employment data at the start of the chapter.

Inspector's Reasoning and Conclusions

- 10.1 Under the first issue the Council have defined 'sui generis' uses in a PIC. However, the Finchley Society considers this unclear, while the GLA maintains that warehouse clubs should not be an acceptable use within industrial areas.
- 10.2 The submissions made on behalf of Costco highlight that while warehouse clubs such as themselves are in a class of their own, recent decisions have found that the tests laid out by PPG6 are relevant to them. Therefore, they will not be suitable on out of centre sites unless they first meet these tests. As the PIC fails to make this clear, I consider it is inappropriate. However, a suitable framework to deal with warehouse club proposals is provided in the Town Centres and Retailing Chapter (Policy TCR1).
- 10.3 As to whether there should be a more descriptive definition of 'sui generis' uses, I consider the problem encountered above demonstrates the difficulties in doing this. Therefore, I consider that the Revised Deposit UDP wording of paragraph 10.1.2 should be retained.
- 10.4 On the second issue, the Council rightly respond that the planning issues in respect of retailing are so different that they require separate policies, i.e. those set out in the Town Centres and Retailing chapter. There is a cross reference to this in paragraph 10.1.2 of the Revised Deposit UDP. As the same paragraph acknowledges that much of the Borough's

employment is in town centres, I see no need to make any reference here to the number of jobs provided by retail uses.

- 10.5 Turning to the third issue, the Council's position in respect of RAF East Camp is made clear in paragraph 10.1.14 of the Revised Deposit UDP. Nevertheless, there is a discrepancy between Table 10.5, Map 10.1, and the Strategic Diagram. The last of these identifies RAF East Camp as an Industrial Business Park while the others do not. The text needs to be updated and the mismatch between the table, the map and the Strategic Diagram resolved.
- 10.6 The fourth issue relates to freight handling and transfer by rail. This is a matter that is adequately covered by Policies EMP5, M15 and by the Cricklewood, West Hendon and Brent Cross Regeneration Area Chapter, notably Policy C7.
- 10.7 In response to the final issue, which arises from the objection of the Finchley Society, it is inevitable that any data referred to in the Plan will become out of date. That in itself does not invalidate it because it can illustrate trends and help in planning for future employment needs. However, the data presented will appear very out of date when the UDP is finally published and it should be updated. The Revised Deposit change to Table 10.1 records numbers as well as percentages and in that respect addresses the Society's objection. I address other aspects of the Society's concern about the figures under Policy EMP6.
- 10.8 The PIC to paragraph 10.1.31 makes a suitable reference to the forthcoming Regeneration Strategy.

RECOMMENDATION

- 10.9 I recommend that:
- (i) No further modification be made to paragraph 10.1.2 as set out in The Revised Deposit UDP;
 - (ii) In respect of the status of RAF East Camp, paragraph 10.3.14 be updated and the discrepancy between Table 10.5, Map 10.1 and the Strategic Diagram resolved;
 - (iii) The employment data in the chapter be brought up to date wherever this is practicable; and
 - (iv) Paragraph 10.1.31 be modified in accordance with the PIC.

Policy GEMP4 (Protection of employment land)

Deposit Draft Objections

GEMP4 / 287 / 1919 Barnet Regeneration
 GEMP4 / 47 / 590 London Transport Users Committee
 GEMP4 / 15 / 1553 North Finchley Agenda 21 Partnership

Revised Deposit Draft Objections

GEMP4 / 223 / 5671R Rialto Homes Plc
 GEMP4 / 153 / 5520R Tesco Stores Limited
 GEMP4 / 134 / 5321R Dixons Stores Plc
 GEMP4 / 202 / 5473R British Telecommunications Ltd
 GEMP4 / 317 / 5621R Beechwood Homes Ltd
 GEMP4 / 180 / 5716R Cricklewood Redevelopment Ltd
 GEMP4 / 45 / 5718R Network Rail

GEMP4 / 290 / 5728R Linden Homes Chiltern Ltd
 GEMP4 / 15 / 5541R North Finchley Agenda 21 Partnership

Support for Pre-Inquiry Changes

GEMP4 / 257 / 6907P Circle 33, Metropolitan & Notting Hill Housing,
 Paddington Churches and Servite

Issues

- The appropriateness of giving priority to certain re-uses of redundant employment sites, in particular affordable housing;
- The implications of the policy for sustainable development;
- Whether the policy could be taken to refer to any land the Council consider is suitable for strategic employment requirements;
- The test to be applied before land in industrial use can be re-used for any other purpose;
- The case for making exceptions for utility buildings or sites where there will be no loss of employment;
- The case for identifying 'key sites' (as referred to in draft PPG13) and making these the subject of a new policy.

Inspector's Reasoning and Conclusions

10.10 On the first issue, the Revised Deposit version of GEMP4 specified that where there was no realistic prospect of re-use for employment or mixed use development, 100% affordable housing would be a priority. However, through a PIC, the Council propose to replace the reference to '100% affordable housing' with 'a significant proportion'.

10.11 For the reasons I have already given in dealing with Policy H6, I do not consider that such an approach is appropriate. Affordable housing provision on any site should be determined in accordance with Policy H5. Under my recommended modification, Policy H5 states that 'the Council will seek to negotiate the maximum reasonable amount of affordable housing' on sites above the specified thresholds. Consequently, I recommend below a reworded version of Policy GEMP4, which omits any reference to affordable housing.

10.12 That revised wording would allow for the 'fall-back' of a mixed use development comprising employment and housing. This would reflect national guidance advocating mixed uses. However, as the stated use is a preference and not a requirement, the policy remains sufficiently flexible to consider other uses that might be more appropriate given the specific circumstances.

10.13 In relation to the second issue, the policy supports the principles of sustainable development. Replacing 'seek to retain' with 'require the retention of', as one objector suggests, would not enable the policy to be sufficiently flexible to consider employment sites that are genuinely redundant. In those circumstances, it would be more sustainable to permit change, in particular to mixed use development.

10.14 On the third issue, the objector is reading too much into the policy. The first sentence of GEMP4 states 'seek to retain' denoting that it applies to existing employment land and not to any land the Council consider is suitable for strategic employment requirements.

10.15 Turning to the fourth issue, PPG4 *Industrial and Commercial Development*

and Small Firms requires authorities to provide for the development needs of commerce and industry. The Council's forecasts show that there will be significant increases in the amount of employment land required by 2015. The Council also points to the threat to Barnet's existing economic base from the high land values that can be gained from alternative uses. In these circumstances, it is both legitimate and necessary for the Council to require evidence that there is no realistic prospect of the re-use of a site for employment purposes.

- 10.16 On the fifth issue, it would be inappropriate for a strategic policy to set out detailed exceptions. Such detail is contained in Policy EMP2, and I refer to my conclusions there.
- 10.17 The final issue concerns the possible identification of 'key sites'. Under the sequential test which applies particularly to retail, office and leisure uses, these are in effect Barnet's town centres, and Brent Cross which is to become a town centre. These are the most accessible sites and, clearly, much of Barnet's employment is concentrated within them. I see no need for a new policy which, in any case, would unnecessarily duplicate Policies GLoc and M1.

RECOMMENDATION

- 10.18 I recommend that Policy GEMP4 be modified to read:

The Council will seek to retain land that meets strategic requirements for small, medium and large scale industrial users. If there is no realistic prospect of re-use purely for employment purposes, mixed use development for employment and housing will be a priority.

Policy EMP1 (Retention of industrial sites)

Revised Deposit Draft Objections

EMP1 / 290 / 5729R Linden Homes Chiltern Ltd 10.3.8b

Support for Policy Changes

EMP1 / 286 / 5664R Barnet Friends of the Earth 10.1.10

Pre-Inquiry Change Objections

EMP1 / 257 / 6909P Circle 33, Metropolitan & Notting Hill Housing, Paddington Churches and Servite 10.3.8b

Issues

- Should 100% affordable housing be given priority in the re-use of redundant employment sites?

Inspector's Reasoning and Conclusions

- 10.19 The Revised Deposit UDP specifies at paragraph 10.3.8b that as an alternative to business units that caused less harm locally, 100% affordable housing would be a priority. However, through a PIC, the Council propose to delete this sentence and insert three new paragraphs. The key effect of this is that 100% affordable housing is changed to 'a significant proportion as affordable housing'.

10.20 For the reasons I have already stated in dealing with Policies H6 and GEMP4, I do not consider that such an approach is appropriate. Affordable housing provision on any site should be determined in accordance with Policy H5. Consequently, with the exception of new paragraph 10.3.8c which promotes the benefits of mixed use development, I do not support the additional text in the PIC.

RECOMMENDATION

10.21 I recommend that:

- (i) The last sentence of paragraph 10.3.8b be deleted; and
- (ii) As set out in the Council's PIC, new paragraph 10.3.8c be added to the text as contained in the Revised Deposit UDP but that no further modifications be made in accordance with that PIC.

Policy EMP2 (Protection of other industrial sites)

Deposit Draft Objections

EMP2 / 26 / 534	The House Builders Federation	
EMP2 / 223 / 1051	Rialto Homes Plc	10.3.8
EMP2 / 153 / 663	Tesco Stores Limited	
EMP2 / 149 / 571	Post Office Property Holdings	
EMP2 / 202 / 589	British Telecommunications Ltd	
EMP2 / 201 / 1006	CPL Resort PTE Ltd	
EMP2 / 180 / 731	Cricklewood Redevelopment Ltd	
EMP2 / 213 / 1592	McLean Homes North London Ltd	

Revised Deposit Draft Objections

EMP2 / 187 / 5440R	Government Office for London	10.3.8
EMP2 / 168 / 5412R	Sainsbury's Supermarkets Ltd	
EMP2 / 95 / 5371R	Defence Estates (South East & Germany)	
EMP2 / 134 / 5325R	Dixons Stores Plc	
EMP2 / 326 / 5481R	Pegasus Retirement Homes Ltd	
EMP2 / 202 / 5471R	British Telecommunications Ltd	
EMP2 / 317 / 5632R	Beechwood Homes Ltd	
EMP2 / 180 / 5717R	Cricklewood Redevelopment Ltd	
EMP2 / 290 / 6841R	Linden Homes Chiltern Ltd	
EMP2 / 15 / 5542R	North Finchley Agenda 21 Partnership	
EMP2 / 15 / 5539R	North Finchley Agenda 21 Partnership	10.3.8b
EMP2 / 15 / 5538R	North Finchley Agenda 21 Partnership	10.3.8a

Support for Pre-Inquiry Changes

EMP2 / 257 / 6908P	Circle 33, Metropolitan & Notting Hill Housing, Paddington Churches and Servite
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Issues

- Whether requiring applicants to demonstrate there is no realistic prospect of re-use for employment purposes is contrary to Government guidance;
- Whether it is appropriate for the policy to refer to 'priority re-uses', in particular affordable housing;
- The marketing period for vacant sites;
- Whether the Council's approach will prevent the delivery of mixed use sustainable urban regeneration;
- Whether other suitable uses which generate significant levels of employment

- should be permitted;
- Whether the policy should include an exception for utility buildings or sites where there will be no loss of employment.

Inspector's Reasoning and Conclusions

- 10.22 With regard to the first issue, PPG4 requires local planning authorities to take into account the development needs of commerce and industry. The Council's forecasts show that there will be significant increases in the amount of employment land required by 2015, particularly for small business accommodation. They have also identified a threat to Barnet's existing economic base from the high land values that can be gained from alternative uses. In these circumstances I consider it is both legitimate and necessary for the Council to require evidence that there is no realistic prospect of the re-use of a site for employment purposes.
- 10.23 On the second issue, where there is a justified planning reason, I consider it is acceptable for a policy to specify a preferred re-use. As it is a preference and not a requirement, the policy remains sufficiently flexible to consider other uses that may be more appropriate given the specific circumstances.
- 10.24 However, for the reasons I have already given in addressing Policy H6, I consider it is inappropriate to refer to '100% affordable housing' (or 'a significant proportion of homes being affordable' as in the Council's PIC). Affordable housing provision on any site should be determined in accordance with Policy H5. Consequently, I do not support the PIC to Policy EMP2 and consider that the second criterion should be deleted.
- 10.25 Throughout this Chapter I recommend that priority uses be limited to mixed use development as this reflects the encouragement given to such a form of development in Government guidance. Given Barnet's needs, the mixture should be a combination of residential and business uses. However, Barnet's stipulation that the business use should comprise 'small business units of equivalent floorspace, employment numbers or improved quality', though a legitimate aim, may be unrealistic if it has already been demonstrated that there is no realistic prospect of re-use or redevelopment for industrial purposes. This stipulation should be deleted from the policy and the reasoned justification for the policy qualified as I recommend below.
- 10.26 On the third issue, the Revised Deposit UDP states that sites should be actively marketed for a period of at least 18 months, (paragraph 10.3.8a) before any alternative use to business could be considered; it replaces the one year period specified in the Initial Deposit UDP. Like the Council, I consider that 18 months as opposed to 3 years is sufficient time to test the market. However, with the necessary marketing period specified in the supporting text, the vague reference to a 'considerable period of time' should be deleted from the policy itself.
- 10.27 Dealing with the next three issues together, CRL suggest the policy should include a criterion which permits redevelopment/change of use where it can be demonstrated that the employment, environment, transport and/or regeneration benefits of redevelopment proposals would outweigh the loss of existing employment facilities. Tesco suggest the policy should have a criterion which permits alternative uses where a feasibility study demonstrates that it will generate significant levels of employment. BT call for exceptions to be made where there is no loss of employment through relocating staff to another site.

- 10.28 However, such criteria would run counter to the intention of the policy which is to protect existing employment sites rather than to promote their redevelopment for alternative uses. There is some flexibility, for the policy does not preclude such uses. In determining any application, there is a duty on the Council to have regard first to the Plan as a whole, and then to any other material considerations.
- 10.29 Regarding other objections: the sites listed in Table 10.5 are protected under Policy EMP1 (GOL); in the Revised Deposit UDP, the policy specifies the use classes it seeks to protect (BT), and; the Cricklewood, West Hendon, and Brent Cross Regeneration Area is now covered by a separate chapter (CRL).

RECOMMENDATION

10.30 I recommend that:

- (i) ', preferably' be inserted between 'small firms' and 'of equivalent' in the last sentence of paragraph 10.3.8a; and
- (ii) the second paragraph of Policy EMP2 be modified to read:

Exceptions will be made only where there is no realistic prospect of re-use in the short, medium and long term or redevelopment for industrial purposes. In these cases the priority re-use will be a mixture of small business units with residential uses.

Policy EMP3 (Consolidation of employment land)

Deposit Draft Objections

EMP3 / 149 / 572 Post Office Property Holdings

Revised Deposit Draft Objections

EMP3 / 327 / 5859R Costco Wholesale UK Ltd

Issues

- The application of the policy to other 'sui generis' employment uses;
- Whether there is a suitable policy framework to consider proposals for warehouse clubs, particularly on land allocated for employment purposes.

Inspector's Reasoning and Conclusions

- 10.31 When read in conjunction with paragraph 10.1.2, I consider that the Revised Deposit version of Policy EMP3 has suitably addressed the first issue.
- 10.32 On the second issue, I consider that Policies TCR1, TCR5 and TCR7 in the Town Centres and Retailing Chapter provide a suitable framework to consider warehouse club proposals. While warehouse clubs such as Costco are a 'sui generis' use, they would not be suitable on out of centre employment sites unless they first meet the tests laid out by PPG6. A PIC to paragraph 11.3.3 clarifies that the sequential approach applies to warehouse clubs.

RECOMMENDATION

10.33 I recommend that paragraph 11.3.3 be modified in accordance with the PIC.

Policy EMP4 (Industrial business park)**Deposit Draft Objections**

EMP4 / 147 / 569 Transport for London

10.1.11

Revised Deposit Draft Objections

GEMP4 / 168 / 5413R Sainsbury's Supermarkets Ltd

Issues

- The suitability of the Northern Telecom site for offices and related uses and the implications in terms of traffic generation.

Inspector's Reasoning and Conclusions

- 10.34 TfL rightly points out that the Northern Telecom site is in an area having low accessibility. This is borne out by Map 7.3. In response, the Council has deleted the reference in paragraph 10.3.11 to the site having good public transport accessibility.
- 10.35 As to the principle of an office use, the site is included in the London-wide schedule of Industrial Business Parks included within Annex 2 to the London Plan. Such sites are provided for companies requiring a high quality environment. In support of the Council's aspiration for the site to be a centre of excellence for high technology, I concur with their view that an exception should be made to Policy EMP6 which directs office development to town centres and areas of high accessibility.
- 10.36 At the same time, it must be recognised that a comprehensive development of this site for research and development/ hi-tech and light industry has the potential to generate considerable volumes of traffic. Given the Council's wider aims in terms of sustainable development it will be important that the volume of this additional traffic is minimised as far as possible. This will mean a firm application of the relevant policies in the Movement chapter, in particular, Policies M2 on the need for a transport impact assessment, M3 regarding green travel plans, M4 and M5 on provision for pedestrians and cyclists, M6 and M7 on public transport and M14 on parking standards. Policy 3C.2 of the London Plan is also relevant. I propose a brief addition to the supporting text.
- 10.37 The objection from Sainsbury's was lodged in respect of Policy GEMP4 as opposed to EMP4. I have dealt with the issues they raise under that policy heading.

RECOMMENDATION

10.38 I recommend that the following be added to paragraph 10.3.11 as set out in the Revised Deposit UDP:

'Given the present low accessibility of this site by public transport it is important that any significant development proposals include measures aimed at minimising the volume of traffic likely to be generated. UDP Policies M2, M3 to M7 and M14, and Policy 3C.2 of the London Plan, are of particular relevance'.

Policy EMP6 (New offices)

Deposit Draft Objections

EMP6 / 263 / 1253	The Finchley Society	10.3.14
EMP6 / 180 / 732	Cricklewood Redevelopment Ltd	

Support for Policy Changes

EMP6 / 263 / 6807R	The Finchley Society
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Issues

- The consistency of the supporting text to Policy EMP6 with the evidence presented on the demand for new office space;
- Whether the Cricklewood Regeneration Area should be specifically referred to in the policy as an area suitable for offices.

Inspector's Reasoning and Conclusions

10.39 The Finchley Society's objection highlights an apparent lack of demand for offices, as displayed by paragraph 10.1.9 and Figure 10.3 of the Initial Deposit UDP. Understandably, the Society is anxious that the Borough avoid any glut of unoccupied office space.

10.40 In the Revised Deposit UDP, the Council have added a sentence to the end of paragraph 10.1.24 (itself the replacement to paragraph 10.1.9 of the former version of the UDP) which clarifies this point. It says that this apparent lack of developer interest does not reflect the identified need for service accommodation for small businesses. Paragraph 10.3.16 of the Revised Deposit UDP provides an estimate of the additional floorspace that is likely to be needed.

10.41 In moving this UDP forward, this projection needs to be carefully checked and updated if necessary. In particular, what will be the impact of the development at Brent Cross/Cricklewood upon the need for office and wider B1 floorspace elsewhere in the Borough?

10.42 With regard to the Cricklewood Regeneration Area, this is dealt with in Chapter 13 of my report.

RECOMMENDATION

10.43 I recommend that, at the Modifications stage, the Council review and, if necessary, update its figures on the projected demand for office space in Barnet.

Policy EMP7 (Re-use of offices)

Support for Policy

EMP7 / 66 / 774	The Empty Homes Agency
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Revised Deposit Draft Objections

EMP7 / 168 / 5402R	Sainsbury's Supermarkets Ltd
EMP7 / 95 / 5378R	Defence Estates (South East & Germany)

EMP7 / 45 / 5719R	Network Rail	
EMP7 / 15 / 5540R	North Finchley Agenda 21 Partnership	10.3.16a
EMP7 / 15 / 5543R	North Finchley Agenda 21 Partnership	

Issues

- The meaning of 'a considerable period of time';
- The case for a period of marketing longer than 18 months;
- The case for expecting a significantly higher proportion of affordable housing from sites subject to the policy;
- The importance of mixed use development;
- Compliance of the policy with the principles of sustainable development.

Inspector's Reasoning and Conclusions

10.44 In respect of the first two issues, what is meant by a 'considerable period of time' is defined in paragraph 10.3.16a as being 18 months. That period would be consistent with the Council's policy on industrial sites and is a sufficient time to test the market. However, there is no need for the policy to include such a statement because the overriding consideration is whether there is a realistic prospect of re-use or redevelopment. The supporting text should be left to explain how this would be tested.

10.45 On the third issue, the Revised Deposit version of EMP7 specifies that where there is no realistic prospect of re-use for offices, 100% affordable housing would be a priority. Through a PIC the Council propose to replace the reference to '100% affordable housing' with 'a significant proportion'.

10.46 As I have explained in connection with Policy H6, I do not consider that such an approach is appropriate. Consequently, I do not support the PIC to Policy EMP7 or paragraph 10.3.16a.

10.47 In respect of the fourth issue, so as to better reflect national guidance, I consider that mixed use development should be identified as the priority. I recommend revised wording below.

10.48 On the final issue, the policy (as I propose it should be modified) supports the principles of sustainable development. It seeks to protect offices, and the jobs they provide, while allowing them to come forward for alternative uses where they are genuinely redundant.

RECOMMENDATION

10.49 I recommend that:

- (i) The second sentence of paragraph 10.3.16a be modified to read: 'Where it is foreseen that there will be no realistic productive re-use of offices and they have been actively marketed for 18 months, (including as serviced offices with retailing below in town centres) the priority re-use will be a mixed use development'; and
- (ii) Policy EMP7 be modified to read:

The development of offices for non-employment uses will be granted planning permission only where there is no realistic prospect of re-use or redevelopment for office purposes. Where this is the case, the priority re-use will be a mixed use development.

Policy EMP9 (New residential development adjacent to industrial uses)

Support for Policy

EMP9 / 204 / 1017 English Welsh & Scottish Railway Ltd

10.3.18

Issues

- Whether Policy EMP9 should be applied to sites with potential as railheads.

Inspector's Reasoning and Conclusions

10.50 While EWS support paragraph 10.3.18 and Policy EMP9, I note they also raise the above issue. I agree with them that were housing to be approved in such locations it would need to build in measures to prevent noise disturbance to its occupants. Issues surrounding rail freight terminals and handling are specifically addressed in Policies EMP5, M15 and C17.

RECOMMENDATION

10.51 I recommend that no modifications be made to the Plan.

Policy EMP10 (Working from home)

Support for Policy

EMP10 / 284 / 1586 The Barnet Society

10.3.19

Issues

- Whether there need to be clear guidelines on working from home through strengthening paragraph 10.3.19 and inserting an additional policy.

Inspector's Reasoning and Conclusions

10.52 While the Barnet Society support paragraph 10.3.19, they also raise the above issue. The final sentence of this paragraph cites the need for particular care with such proposals so as to protect residential amenity. This is a question of the effective operation of normal development control. The UDP contains sufficient policies to guide this and there is no need to make any further changes.

RECOMMENDATION

10.53 I recommend that no further modifications be made.

Proposed new policies

Deposit Draft Objections

NewPol / 218 / 1112 Middlesex University
NewPol / 286 / 1820 Barnet Friends of the Earth
NewPol / 286 / 1823 Barnet Friends of the Earth

Issues

- The need for a new policy stating that the Council will support the expansion, conversion and redevelopment of businesses on sites allocated for business use;
- The need for new policies regarding access to affordable premises for use in skills training or developing economic initiatives.

Inspector's Reasoning and Conclusions

- 10.54 On the first issue, I consider that such a policy would unnecessarily duplicate the Revised Deposit version of Policy EMP3.
- 10.55 The second issue concerns land use planning matters on the one hand and economic development on the other. The former are already covered by policies in this chapter, notably GEMP2 and EMP2. I would expect the other matters - the need for affordable premises and training - to be promoted through Barnet's Economic Development Plan and its forthcoming Regeneration Strategy; references to these appear in paragraph 10.1.31 and the related PIC.

RECOMMENDATION

- 10.56 I recommend that no modifications be made to the UDP.
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