



Barnet Draft Local Plan
Publication Stage Representations Form

Ref: (For official use only)

PART B - Your representation

Please complete a separate Part B for each representation and return along with a single completed Part A.

Question 1: To which part of the Local Plan does your representation relate?

Representations must be made on a specific policy or part of the Plan, please state the policy number, paragraph number, figure/table or Policies Map designation.

Policy ECY01 Paragraph _____ Figure/Table _____

Policies Map designation _____

Question 2: Do you consider that this part of the Local Plan is:

Tick all that apply, please refer to the guidance note for an explanation of these terms.

- | | | |
|--|------------------------------|-----------------------------|
| a) Legally compliant | Yes <input type="checkbox"/> | No <input type="checkbox"/> |
| b) Sound | Yes <input type="checkbox"/> | No <input type="checkbox"/> |
| c) Compliant with the Duty to Co-operate | Yes <input type="checkbox"/> | No <input type="checkbox"/> |

Question 3: Please give details of why you consider this part of the Local Plan is not legally compliant, is unsound, or fails to comply with the duty to co-operate.

Please be as precise as possible. If you wish to support the legal compliance or soundness of the Plan, or its compliance with the duty to co-operate, please also use this box to set out your comments.

Please see attached letter.

Continue on a separate sheet if necessary

Question 4: Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect to the matters you have identified in Question 3 above. *Please note that non-compliance with the duty to co-operate is incapable of modification at examination. You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.*

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Yes, I wish to participate in hearing session(s)

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N/A

Declaration of consent

The personal information you provide on this form will be processed in accordance with General Data Protection Regulations 2018 (GDPR). The information you provide will only be used for the purposes of the preparation of the Local Plan as required by the Planning and Compulsory Purchase Act 2004 (as amended), and may be used by the Council to contact you if necessary, regarding your submission. Your name, name of organisation, and comments, will be made available for public inspection when displaying and reporting the outcome of the statutory consultation stage and cannot be treated as confidential. You will not be asked for any unnecessary information and we will not publish any personal data beyond what is stated in this declaration.

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Signature Planning Potential Date 06/08/2021



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Signature Planning Potential Date **06/08/2021**

Planning Policy Team
7th Floor
2 Bristol Avenue
Colindale, London
NW9 4EW

6 August 2021

Our Ref: 20/5748

Dear Sir/Madam

Barnet Draft Local Plan (Regulation 19) Publication Consultation

Introduction

On behalf of a consortium of landowners representing the **Travis Perkins Site and Hurricane Trading Estate at Avion Crescent**, Colindale, we write in respect of the current Regulation 19 consultation, running from 28th June to 9th August 2021, through which the Council is inviting comments on. This consultation follows on from the previous Regulation 18 consultation that ran from 27th January to 16th March 2020.

The new Local Plan will set out a vision for how Barnet will change as a place over the next 15 years and forms a strategy which emphasises the borough's attractiveness as a place to live, work and visit. Once adopted, the new Local Plan will replace the existing 2012 Local Plan and will provide the main basis upon which future planning applications will be determined.

Our instructing Clients own the **Travis Perkins Site and the Hurricane Trading Estate at Avion Crescent** (hereinafter referred to as "the Site").

By way of background, these two land parcels comprising the Site are located adjacent to one another on Avion Crescent, adjacent to the Grahame Park Way Corridor of Change as identified within the Colindale Area Action Plan (CAAP), adopted 2010. It is also located within the Colindale/Burnt Oak Opportunity Area of the London Plan and the Colindale Opportunity Area of the draft Local Plan.

The Site is the subject of recent pre-application discussions with the Council (ref: 20/0547/QCA) that took place in January 2021. Written advice was issued on 7th July 2021. Emerging proposals were presented by the consortium of landowners for the redevelopment of the Site to comprise a residential-led, mixed use development including flexible employment floorspace at ground level with residential uses above. The proposals would seek to intensify the existing employment yield, whilst making better use of the Site for new housing in addition. A comprehensive public realm and landscaping strategy for this section of Avion Crescent would also accompany the proposals, contributing towards wider place-making objectives between two key regeneration areas: Grahame Park and Beaufort Park.

Regarding the principle of development, key outcomes from the pre-application meeting are as follows:

- The Council has no in-principle objection to residential-led mixed-use development of the site;

Directors
Helen Cuthbert | Stuart Slatter | Claire Temple | Alastair Close
Dan Templeton
Associate Directors
Katie Turvey | Heather Vickers | Alan Williams

Consultant
Lorna Byrne
Associates
Sally Arnold | Rob Scadding | Penny Moss | Sam Deegan | Paul Galgey
Niall Hanrahan | Phil Marsden | Charlotte Perry | Charlotte Hunter

- The site is a Non-Designated Industrial site;
- The pro-development stance has regard to the site's location within the Grahame Park Way Corridor of Change and within a designated Opportunity Area;
- Light industrial uses would be best suited to an intensified use of the site for residential-led mixed-use development.

Representations

Policy ECY01: A Vibrant Local Economy

While we have no comments in respect of the proposed approach to co-location development on Locally Significant Industrial Sites, we are concerned to see that Hurricane Trading Estate and the adjacent Travis Perkins site – i.e. all of our clients' landholding – is to be designed as a Locally Significant Industrial Site (LSIS). This would be a change from its existing status as a Non-Designated Industrial Site (NDIS). **We hereby object to the proposed consolidation of the land as LSIS.** It does not appear that our clients have been consulted on this proposal directly.

After positive pre-application discussions, our clients are reviewing the advice received and are appraising potential development options. Pre-application advice was pursued on the basis that the site was not statutorily protected as a LSIS and the proposed elevation of its status materially alters the planning policy context under which prospective development proposals would be assessed. It is counter-productive for the Council to allocate the site as LSIS when it is aware of our client's emerging proposals to regenerate and intensify the site.

The proposed wording of Policy ECY01 states:

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.

This is a more stringent policy assessment than if the site were to remain as NDIS, which considers other factors including (inter-alia), the *"contribution of the proposed use to the Council's growth objectives for the local area"*.

While our clients have set out their desire to pursue a genuinely mixed-use proposal with the provision of flexible commercial / industrial floorspace, the proposed wording of ECY01 would significantly divert focus away from the residential element of the proposal, if the proposed designation as LSIS is carried forward. In effect, the policy requirements to make a scheme including residential development acceptable in principle would become more complex. This has significant potential to stifle the opportunity to intensify the planning benefits offered by redevelopment. Our pre-application meeting highlighted how new residential development could play a significant role in linking together two key regeneration areas, through enhanced public realm and place-making, in a location that has been historically overlooked by planning policy.

We urge the Council to reconsider this proposed designation.

More generally, we consider the supporting text to Policy ECY01 is well-founded, and recognises the opportunities presented in London Plan Policy E7 regarding Industrial intensification, co-location and substitution.

We support the pursuit of opportunities for the co-location of industrial and residential uses. The Greater London Authority (GLA) has published extensive guidance on industrial intensification and co-location through plan-led and masterplan approaches and offers a viable means of addressing London's housing shortage by making better use of inefficient land. Its Industrial Intensification and Co-Location Study (2018) provides best-practice guidance on successful co-location development typologies which could be applied to the Site and across the Borough more widely.

This approach has been a particular success in London Boroughs such as Southwark and we would encourage LB Barnet to make best use of the planning powers at their disposal to follow a similar mixed use growth agenda. The Council has a prime opportunity to allocate the site for mixed-use development, thereby taking a proactive approach to employing an intensification strategy for under-use industrial land.

With regards to the supporting text to Policy ECY01, paragraph 9.7.8 states that while manufacturing and other industrial activity are in decline, there continues to be strong demand from companies wanting to occupy 'industrial' buildings. Barnet needs to find a way of accommodating the needs of this diverse group of occupiers. 'Industrial' type businesses require a higher specification with flexible space. New stock, if provided, is likely to use land more intensively and to provide more flexible space that is appropriate to modern business processes. Further, paragraph 9.2.3 highlights the importance of the new and wider Use Class E to provide greater flexibility to change between uses.

As set out at paragraph 9.7.3, Barnet envisages that it will meet identified need through intensification and windfall. Our client's emerging proposals would be flexibly designed to adapt to modern and future trends. It is not considered that retaining the site's existing status as NDIS would hinder its future industrial / commercial output because both London Plan E7 and emerging Policy ECY01 require a comprehensive assessment of the industrial function in any case. However, it would offer greater flexibility in terms of the residential portion of the site.

Evidently, the existing condition of the Hurricane Trading Estate is inefficient and offers a relatively low employment yield for the size of site and its location. Further, Travis Perkins have now vacated their former site, leaving it redundant. There is a significant opportunity to not only increase the employment yield offered, but create flexible, modern industrial workspaces that can breathe new life into the location. This opportunity would be stifled if its status was upgraded to LSIS.

Policy BSS01 Spatial Strategy for Barnet

The draft Local Plan recognises the significant development potential of the Borough. We strongly support the growth strategy proposed which is guided by the identification of several Opportunity Areas and Growth Areas. The Opportunity Areas are designated within the London Plan as the capital's principal opportunities for accommodating large scale development. Whilst the Growth Areas are distinctive locations with good public transport accessibility and have a supply of brownfield and underused land and buildings that offer opportunities for inward investment.

Policy GSS01 Delivering Sustainable Growth

We strongly support the Council's policy objective to create the conditions for sustainable growth to deliver the homes, jobs, retail floorspace and community facilities to meet Barnet's identified needs, in accordance with Paragraph 11 (b) of the National Planning Policy Framework (NPPF) (2021). Specifically, the policy sets out that 23,300 new homes will be directed to 6 identified locations. These locations include Colindale, which has capacity for 4,100 homes over the plan period between 2021 and 2036.

In accordance with Policy D3 ("Optimising Site Capacity through the Design-led Approach") of the London Plan, draft Policy GSS01 advocates that development must make the best use of land by following a design-led approach that optimises the capacity of sites, ensuring that development is of the most appropriate form and land use for the site. We support this approach, in accordance with London Plan Policy D3.

Policy GSS06 Colindale Growth Area

Colindale is at the heart of the Council's vision to sustainably address the need for homes and jobs for Barnet's growing population, whilst protecting and getting the best from the Borough's heritage and extensive open spaces. The policy sets out that development in Colindale up to 2036 will be focussed at Land at Colindale Underground Station, The Grahame Park Estate, Colindale Gardens, The Public Health England site and Middlesex University's Platt Hall.

The CAAP was adopted in 2010 and forms part of the wider Colindale / Burnt Oak Opportunity Area designated within the London Plan. The London Plan recognises the development potential of the Opportunity Area to provide 7,000 new homes and 2,000 jobs. 4,000 have already been delivered, making Colindale the largest contributor to housing and affordable housing in the Borough and one of the biggest in North London. The current spatial strategy in the CAAP allocates four distinct Corridors of Change, for which most new development will be concentrated. These include Colindale Avenue (concentrated around Colindale tube station, for which there is an SPD); Edgware Road; Aerodrome Road and Grahame Park Way. The Site sits between the latter two Corridors of Change, which are significant regeneration projects.

The CAAP is now significantly outdated, with many proposals identified within it now having been completed. Whilst a new framework for local growth under draft Policy GSS06 is welcomed, the draft policy misses the development opportunity presented by the Site. **We strongly endorse an update to the CAAP to take account of changing circumstances and new opportunities presented beyond the existing document – including our clients' land interests.**

The current environment along Grahame Park Way, and Avion Crescent in particular, is overlooked within the CAAP, with the strategic focus on more intensive areas of change. This area is a key link road between two areas of change, but lacks character and feels like a transitional zone, comprising of an assortment of building types and uses. Indeed, the Site presents a significant opportunity to revitalise the route and unite the reinvigorated neighbourhoods at Grahame Park to the north and Beaufort Park to the south that current feel isolated from one another.

Policy HOU02 Housing Mix

We acknowledge the latest housing needs evidence to inform the housing mix of development proposals. However, whilst housing mix is informed by market demand for specific housing products, we are supportive of the flexible application set out in Policy HOU02 which recognises that site size, characteristics and location are relevant to devising appropriate housing mixes. Indeed, the local development context should be regarded as a key influence on housing mix, with different parts of the Borough demanding a range of approaches in order to deliver the right mix in the right locations. This aligns with the design-led approach to optimising site capacity. Higher density development should be focussed in Opportunity Areas and Growth Areas in order to make the best use of land and deliver the required level of growth.

Policy CDH01 Promoting High Quality Design

We strongly support the Council's objective in setting out a framework to deliver high-quality design and developments, aligning with the new objective in the National Planning Policy Framework (NPPF) (2021) of beautiful design.

Policy CDH03 Public Realm

We strongly support the Council's objective to deliver high-quality, inclusive and effective public realm as part of development proposals to contribute to the delivery of placemaking, social interaction and the health and wellbeing of residents. This is in accordance with Paragraph 130 (f) of the NPPF (2021) which states that developments should create places that are safe, inclusive and accessible and which promote health and well-being, with a high standard of amenity for existing and future users.

Given its prominent location between the existing neighbourhoods of Grahame Park to the north and Beaufort Park to the south, the Site represents an overlooked opportunity to provide a key piece of public realm to transform and revitalise Avion Crescent. Further, Policy T2 ("Healthy Streets") of the London Plan states that development proposals should deliver patterns of land use that facilitate residents making shorter, regular trips by walking or cycling. In its existing format, Avion Crescent does not facilitate connectivity between the Site and the wider area, acting as a functional transitional route that offers little by way of useable public realm. The provision of an enhanced public realm and active frontage along Avion Crescent would reduce the local dominance of vehicles, promoting the principles of building sustainable, healthy and walkable neighbourhoods.

Indeed, the Site could deliver a significantly improved pedestrian environment with the promotion of a more cycle-friendly route between Grahame Park and Colindale Underground Station.

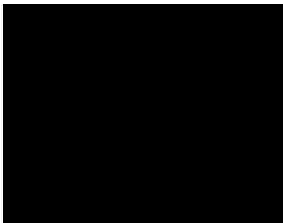
Conclusion

We conclude that the Regulation 19 Local Plan sets out a positive and proactive strategy for growth, providing strong foundations to transform the Borough through regeneration opportunities and the delivery of new development. Specifically, Colindale is to play a crucial role in the Council's housing delivery strategy which will be accompanied by other uses including new employment opportunities.

However, our principal representations raise concern with the proposed designation of the Site as LSIS, which threatens to undermine positive discussions regarding the site's prospective mixed-use intensification to date. Further, we endorse a reviewed planning framework for Colindale, to update the existing CAAP which is over ten years old and, by the Council's own admission, significantly outdated. If further opportunities within the Opportunity Area are to be realised, it is vital that planning policy is sufficiently robust. If the Council chose to allocate the site for mixed-use development, it would demonstrate a proactive approach to pursuing an industrial intensification strategy in accordance with London Plan Policy E7.

We would be happy to discuss further and look forward to engaging further in the Borough's preparation of a new Local Plan.

Yours sincerely,



Paul Galgey MRTPI

Associate

Planning Potential

London