Appendix 4: Justification for the making of Article 4 Directions: office to residential, light industrial to residential and storage and distribution centre (warehouse) to residential

1.0 Introduction

1.1 The Council has proceeded to make Article 4 Directions to restrict the change of use from three different use classes of employment floorspace:

- office to residential
- light industrial to residential
- storage and distribution centre (warehouse) to residential

The Directions have been made for certain parts of the Borough where it is necessary to protect the local well-being and amenity of the area, in accordance with paragraph 55 of the National Planning Policy Framework (NPPF).

1.2 This paper sets out the Council's case for the making of Article 4 Directions.

2.0 Background

2.1 Since 2013 the Government has sought to boost housing delivery by allowing developers to more easily convert some B use buildings such as offices into residential through a prior approval process. The criteria for determining a prior approval are set out in the General Permitted Development Order (GPDO).

2.2 Barnet's economy is driven by small to medium enterprises (SMEs) (both office and industrial) who serve the local area rather than London or the South East. It is therefore important for Barnet to manage any change of use and potential loss of employment space as the sustainability of Barnet's economy relies on the continued functioning of small businesses that supply jobs and services to local people. Article 4 is a mechanism that will allow for this management and careful consideration.

2.3 The Government requires Planning Authorities to identify exceptional circumstances before making Article 4 Directions. In Barnet the exceptional circumstances relate to its economic and physical make-up, low office vacancy levels and property prices that mean the permitted development right, while achieving the government's aim of increasing additional housing, is having unintended consequences that may harm the borough's economic well-being and Barnet's ability to deliver the aims of the NPPF. The Article 4 Directions proposed by the Council are needed to protect the economic sustainability of the Borough and to achieve National, London and Local policy objectives.

2.4 As Paragraph 8 of the NPPF states: "*Achieving sustainable development means that the planning system has three overarching objectives, which are interdependent and need to be pursued in mutually supportive ways….*

a) an economic objective *– to help build a strong, responsive and competitive economy, by ensuring that sufficient land of the right types is available in the right places and at the right time to support growth, innovation and improved productivity; and by identifying and coordinating the provision of infrastructure;*

2.5 Paragraph 15 requires "….*Succinct and up-to-date plans should provide a positive vision for the future of each area; a framework for addressing housing needs and other economic, social and environmental priorities*."

2.6 Further to this Section 6 of the NPPF (2019) is titled Building a strong, competitive economy, paragraph 80 goes on to state:

"Planning policies and decisions should help create the conditions in which businesses can invest, expand and adapt. Significant weight should be placed on the need to support economic growth and productivity, taking into account both local business needs and wider opportunities for development. The approach taken should allow each area to build on its strengths, counter any weaknesses and address the challenges of the future…".

Paragraph 82 requires *"Planning policies and decisions should recognise and address the specific locational requirements of different sectors."*

2.7 Barnet's Employment Land Review (ELR) highlights the vulnerability of the Borough's employment land and warns that the Borough could lose jobs as a result of constraints within the commercial property market. The reduction of stock is leading to increases in rent and this along with the lack of investment in new stock could result in businesses moving out of Barnet. High rent and low quality of space also provide little incentive for new businesses to move into Barnet or establish themselves in the Borough long term. This situation is compounded by the competition between the residential and commercial property markets

2.8 Policy CS8 of the Barnet Local Plan aims to promote a strong and prosperous Barnet. This includes the management of the loss of office space as expressed by policy DM14 which requires developers to re-provide employment space as part of a mixed use development; loss of other B uses will also be resisted without evidence to demonstrate they are no longer suitable for employment uses.

2.9 Applications for permitted development are not required to provide this level of evidence nor can they be held responsible for assisting businesses to relocate to other appropriate premises.

2.10 The housing delivered through permitted development is not managed through the Local Plan policy particularly on dwelling mix, size and affordability undermining Barnet's ability to manage for the right homes in the right locations.

3.0 Article 4 Directions for Barnet Employment B1(a), B1(c) and B8 Uses

3.1 The Directions being made by the Council cover nine town centres, employment sites designated in the Local Plan and other selected sites across the Borough. The use of Article 4 directions to remove national permitted development rights should be limited to situations where this is necessary to protect local amenity or the wellbeing of the area. Proportionally only a small area of Barnet is identified so the justification relates to those parts where Article 4 is being recommended. Nevertheless, the National Planning Practice Guidance states that "*The potential harm that the direction is intended to address should*

be clearly identified"[1].

3.2 The ELR provides detail on the employment land in Barnet and the importance of its retention. In terms of enterprise size, the ELR identifies that Barnet is:
"predominantly small business economy, with a particularly high and growing proportion of self-employment. The local economy is vibrant with Barnet having the third highest business base in London and collecting nearly £100m annually through business rates."

3.3 The sites and areas identified by the Directions have been identified because of their contribution to existing employment. The areas identified reflect concentrations of existing employment and town centres identified as worthy of protection in the ELR stating that *"They may not be the most attractive or modern properties, but they fill an economic niche, especially for small businesses, but potentially for medium enterprises."*

3.4 A significant proportion of office stock in Barnet has already been converted, in particular buildings considered structurally redundant and part vacant. Many of the buildings which remain in office use and not redundant are considered to be under threat from conversion to residential especially given relative land values in Barnet and the demand across London in the residential rental market.

3.5 The ELR identified the following regards employment distribution:

"Overall, Barnet lacks a single strong centre, so firms are distributed among a series of small town centres along a "U" formed by the A1000, the North Circular and the A1/M1 corridor, with the A1000 town centres mainly (Chipping Barnet, East Finchley, North Finchley and Whetstone), although not exclusively, office-based in character, the North Circular largely occupied by distribution units and a somewhat more mixed character along the A1/M1 route. This lack of a strong town centre is something of a challenge in terms of creating critical mass for job generation and sustaining."

3.6 The potential harm that the directions are intended to address is the combined threats of the loss of employment land; the ability of businesses to continue to operate; and the loss of jobs within the Borough and how these impact on Barnet's economic sustainability.

Commercial

3.7 For the office to residential Direction nine town centres are included on the basis that there is significant employment density.in these town centres. Refer to the map in Appendix A for employment density.

3.8 It is considered that the continuation of permitted development rights will result in significant loses in terms of the availability and mix of Barnet's office provision in these locations, restricting local employment and reducing the potential for reinvestment and expansion of existing occupiers thus harming Barnet's economic success and diversity.

3.9 The aims of the permitted development right is to create additional housing from unused and underused employment premises. This has generated 688 new homes for the loss of 40,930 m^2 of office floorspace. A further 62 units with a loss of 2,518m^2 were started in 2016/2017 reporting year. In total from 2013 to date prior approvals for B1a to C3 account for 103,994m^2 of office floorspace.

[1] Paragraph: 038 Reference ID: 13-038-20140306

3.10 Local examples of large 1960s and 1970s office blocks converted through Permitted Development Right (PDR) include:

- Checknet And Durkan House 153-155 East Barnet Road Barnet (30 units)
- Endeavour House, 1 Lyonsdown Road, Barnet, Herts, EN5 1HR (81 units)
- Premier House, 112 Station Road, Edgware, Middx, HA8 7BJ (112 units)
- Trafalgar House Grenville Place London NW7 3SA (28 units)

3.11 The high levels of vacant and redundant office space as a result of the economic downturn in 2009 have now been removed from the market. Employment space coming forward for conversion through PDR is now usually occupied and fulfilling an important employment role in Barnet. Therefore, further loss should be resisted. The ELR highlights the 2017 London Office Policy Review which found that, where occupancy status of PDR applications could be determined, around 65% of approvals in Barnet were non-vacant (which may be fully or partially occupied). Using industry standard density ratios of 10 sq. m per worker this represents around 2,550 jobs being displaced, this is considered to be a conservative estimate.

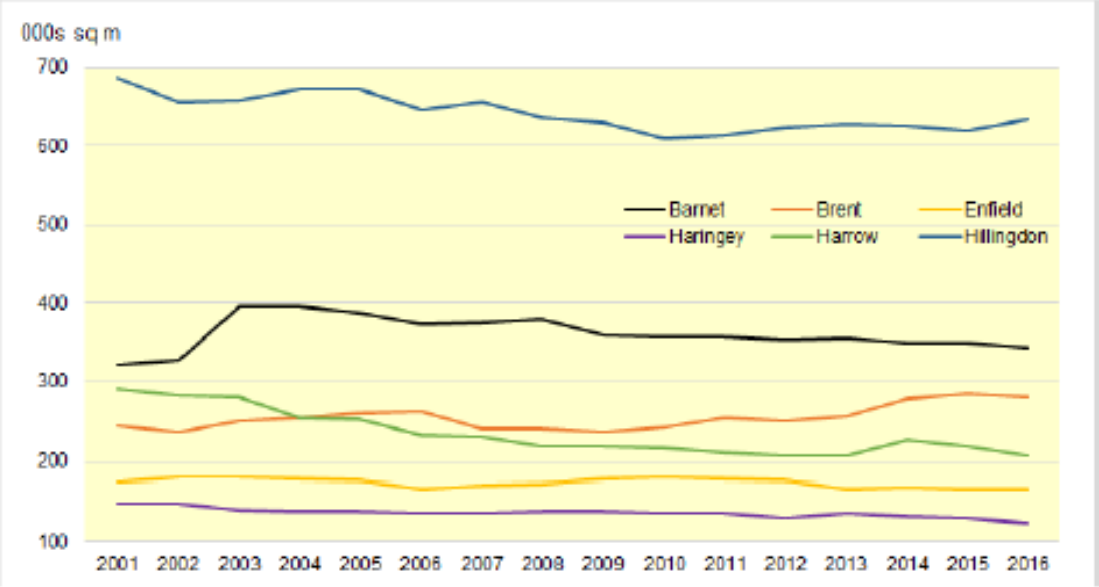
3.12 The ELR highlighted that Barnet is not a 'recognised' (in market terms) office or industrial location with scant data available on the workings of the market. Furthermore, the great majority of leasing transactions fall below 500 sq. m, and are not recorded in market commentaries. This weakens our understanding of the frictional vacancy rate for offices. The London Plan 2016 recommends an 8% frictional vacancy rate for offices across London. Frictional vacancy ensures there is space available for businesses to move into and also expand. If the vacancy rates are too low within the Borough it will be difficult for businesses to find suitable space and could jeopardise Barnet's economic sustainability even further.

3.13 The London Office Policy Review 2017 which supports the draft London Plan estimates that the majority of London Boroughs are operating at less than this optimal frictional vacancy rate. This report indicates that Barnet does need to increase its office floorspace, however it also expects that this will be met by the proposed office space at Brent Cross.

3.14 The ELR identified that while Barnet has a relatively large stock of offices, the quantum has been shrinking in the past decade (predominately due to losses to residential development) and there has been very little renewal. The Valuation Office Agency Business Floorspace Statistics 2016[2] states that Barnet's stock of office floorspace is 343,000m^2. Loss of office stock in Barnet since 2004, when the amount of office floorspace peaked at 396,000m^2, amounts to a 13% reduction (this figure will include most but not all of the 40,930m^2 lost through prior approval conversion). By comparison, office stock across Outer London fell by 9% over the same period. PDR has accelerated the rate of loss. Figure 1 below shows the gradual decline in Barnet alongside other outer London boroughs.

[2] Valuation Office Agency Statistical Release 8 December 2016: Non-domestic rating: Business Floorspace England and Wales: Table FS3.3: Office sector - total floorspace1, by administrative area, data to 31 March 2016.

Figure 1: Office property stock (sq. m), 2001-2016



Source: Valuation Office Agency (2016)

3.15 The ELR states:

'Our site assessment exercise and discussions with local agents confirmed that, while Barnet has a relatively large stock of offices, the quantum has been shrinking in the past decade (due mainly to losses to residential development) and there has been very little renewal. The stock is also relatively dispersed…

…The combination of low new supply and shrinking stock will have the effect of denuding Barnet's already marginal role as an office location capable of attracting inward investors (developers and occupiers).'

3.16 The B1 (a) Article 4 will enable the management of employment space, ensuring where necessary that redevelopment of office space results in a mixed use development that delivers new office space and residential along with other town centre uses as appropriate. This will ensure the sites integrate with the existing area and provide long term sustainable outcome for the Borough.

Industrial

3.17 The London Industrial Land Demand (LILD) October 2017[3] investigates the supply and

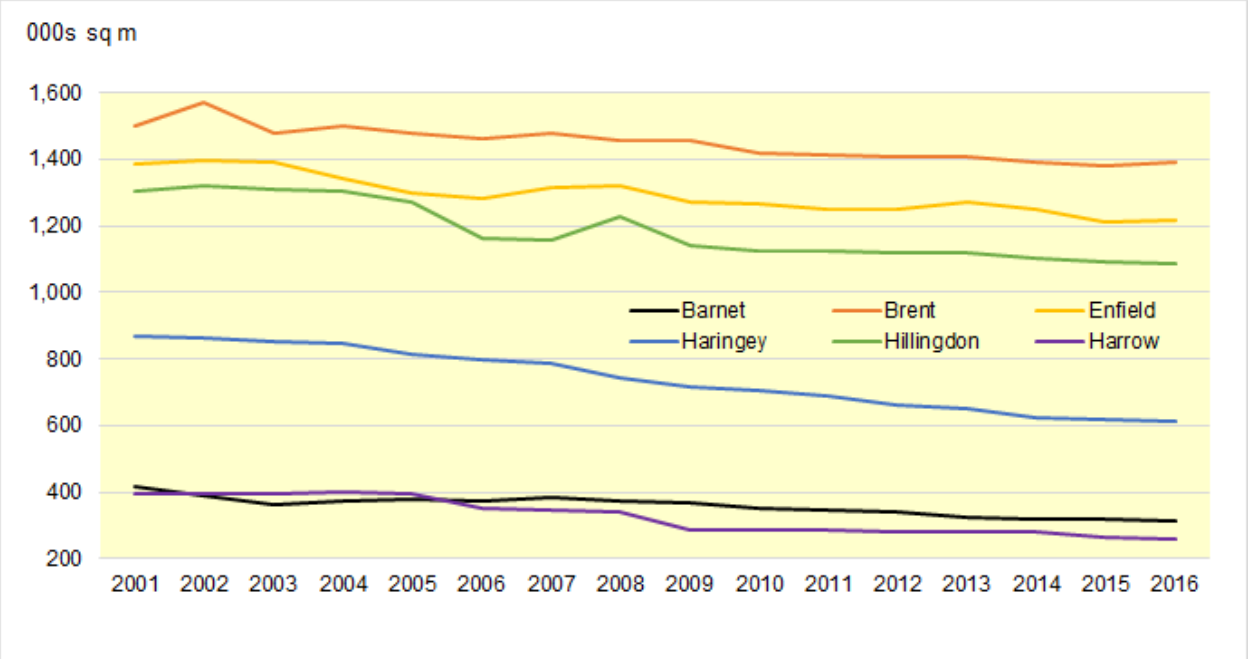
[3] https://www.london.gov.uk/sites/default/files/ilds_revised_final_report_october_2017.pdf

demand for industrial land across London. Barnet is identified as being in the Park Royal/ Heathrow property market which is an area of London which has shown growth in employment especially in logistics, manufacturing and motor trades for the period 2009-2015.

3.18 Barnet has several areas of B1(c) and B8 industrial land that provide a range of services to the local area and West London. The LILD identifies Barnet as having a 6% vacancy rate for industrial land. The Mayor of London's Land for Industry and Transport SPG states that boroughs should have a minimum frictional vacancy rate of 5% and a maximum of 8%. However, it also states that Boroughs with a vacancy rate between 5 and 8% are encouraged to manage this rate through DPDs and ELRs to reduce it towards 5% of the total land stock. The draft London Plan however recommends the retention of all the Barnet industrial land[4]

3.19 The ELR highlights a constant decline in industrial floorspace in Barnet since 2001. The Valuation Office Agency Business Floorspace Statistics 2016 states that Barnet's stock of industrial floorspace is 12,000 m^2. There has been a greater reduction in industrial stock compared to office stock, falling from 417,000 sq. m in 2001 to just 312,000 m^2 in 2016 – a fall of 25%. Across Outer London, industrial stock fell by 9% over the same period this is illustrated in figure 2 below.

Figure 2: Industrial property stock (sq. m), 2001-2016



Source: Valuation Office Agency (2016)

3.20 The loss and shortage of available space seem to be contributing to an increase in rent for industrial floorspace, with the ELR noting that *for industrial the shortage of space in*

[4] Table 6.2 page 237 draft London Plan December 2017

Colindale had seen rents rise from £11 per sq. ft. to £14 per sq. ft. over the past five years.

3.21 Industrial land is varied in quality across Barnet, however the ELR notes that this variance is a positive in ensuring that a variety of businesses are able to operate in the Borough. All healthy property markets need stock of lower quality industrial land to provide the opportunity for an assortment of employment uses to establish and operate in the Borough especially in the service sector.

3.22 Overall the LILD predicts that there will be a demand for 7.3ha of land across all industrial uses. This predominately results from the release of B1(c) light industrial uses with the LILD suggesting that Barnet could reduce this land use by 2.2ha. This however is based on predominately employment density calculations which vary markedly between the various uses that are considered to be B1(c). This release is outweighed by the predicted demand for warehouse and logistics uses (predominately B8 uses). The LILD predicts that there could be a demand for approximately 9.3ha of this type of use in Barnet over the period 2016-2041. While this is only a prediction it does demonstrate that the demand for B8 uses in Barnet is unlikely to diminish and that there needs to be a cautious approach taken in releasing industrial land for other uses.

3.23 It is the overall demand for 7.3ha of industrial land that is the basis for the draft London Plan 2017 recommendation of retaining Barnet's industrial land.

3.24 Placing an Article 4 on the B1(c) and B8 on the identified areas in the Borough will enable Barnet to appropriately manage the release or redevelopment of any industrial sites in a manner that ensures the long term sustainability of these uses in the Borough.

4.0 Ensuring the vitality of town centres

4.1 The NPPF (paras 23 – 27) specifically sets out what planning authorities should consider in the drafting of planning policies for town centres but also includes consideration for areas on the edge of these centres. Paragraph 23 includes offices as part of the mix of uses needed in town centres.

4.2 Paragraph 82(a-g) of the draft NPPF describes how planning authorities should support town centres. Paragraph 82 (d) states that planning policies should *"allocate a range of suitable sites in town centres to meet the scale and type of development needed, looking at least ten years ahead. Meeting needs for retail, leisure, office and other main town centre uses over this period should not be compromised by limited site availability, so town centre boundaries should be kept under review;"*

4.3 Barnet has a complex pattern of town centres with a hierarchy comprised of Edgware, a major centre, along with 14 district centres, 5 local centres and 10 neighbourhood centres. Appendix B shows the distribution of Barnet's major, district and local town centres. Barnet has the most district town centres in London. Offices and light industrial uses are part of the balance necessary in many of Barnet's centres to maintaining and enhancing their viability and vitality.

4.4 Analysis of prior approvals from May 2013 and March 2017 demonstrates that 50% of all applications are in town centre locations with the remainder either in edge of centre or residential locations. This loss of employment in town centres will have a detrimental impact upon the strength and character of these centres by reducing the proportion of consumers in and around these centres, supporting local shops and other businesses. The

following centres have been particularly impacted:

- New Barnet has lost 14,932m^2 of office floorspace through PDR in return for 281 new units
- Finchley Church End has lost 12,315 m2 of office floorspace through PDR in return for 220 new units
- Edgware has lost 7,684 m2 of office floorspace through PDR in return for 128 residential units (Premier House in Edgware is the largest prior approval in Barnet and represents a loss of 6793 m2 for 112 new units)
- North Finchley has lost 2,693m2 of office floorspace through PDR in return for 80 new units
- Chipping Barnet has lost 2,799 m2 of office floorspace through PDR in return for 33 new units
- Whetstone has lost 3,571 m2 of office floorspace through PDR in return for 79 new units

4.5 Appendix C shows the distribution of prior approvals for B1(a), B1(c) and B8. The areas outlined in red are the town centres and other employment sites that are proposed for Article 4.

5.0 Delivering a wide choice of high quality homes

5.1 Paragraph 51 of the NPPF states that local authorities "…*should normally approve planning applications for a change to residential use and any associated development from commercial buildings…. where there is an identified need for additional housing in that area, provided that there are not strong economic reasons why such development would be inappropriate*."
There is no corresponding paragraph in the draft NPPF regarding the change to residential use. However, paragraphs 117 and 118 promote the effective use of land to meet the needs of homes and other uses.

5.2 This approach is reflected in Local Plan policies, with planning proposals expected to provide marketing evidence of demand for continued office use of a site and, where no need or demand is demonstrated, the preferred replacement use would be permanent residential.

5.3 The Council can demonstrate a 5 year supply of deliverable housing sites which is a requirement of the NPPF (both current and draft versions). This is set out in the Authorities Monitoring Report.

5.4 The Article 4 Directions will not harm Barnet's ability to deliver new homes. By bringing decision making on the conversion of offices to residential back into the control of the Council we can better manage growth for the right homes in the right locations in accordance with Barnet's adopted planning policies.

5.5 Under the NPPF there is a requirement to plan for needs of market and affordable housing. Generally, where applications come forward for the change of use from office to residential which are acceptable (due to vacancy or where premises are not fit for purpose) subject to our current threshold of eleven units a proportion of units are negotiated for affordable housing. The loss of employment sites that are generally occupied and fit for purpose

however, are being converted for residential use under PDR, without the need to provide affordable housing.

6.0 Sites in Barnet for Article 4

6.1 The ELR identifies 43 sites or areas of Barnet and makes recommendations as to whether they should be afforded Article 4 protection. This list has been examined in detail and the existing policy constraints and aspirations considered. As a consequence, only employment locations or town centres where the B1 (a), B1(c) or B8 PDR threaten the long term viability have been identified for Article 4 Direction protection.

6.2 An example of an employment location not covered by the Article 4 Direction is the Public Health England (PHE) site in Colindale. PHE is identified as having a range of uses including an education and training unit (Use Class D1) and facilitating the identification of rare pathogens which includes PHE's Specialist and Reference Microbiology Laboratories (Use class B1(b)). It is therefore unlikely that this site would be able to come forward under either the B1 (a) or B1(c) PDR as the site is technically mixed use in nature.

6.3 The following table provides information on the 43 sites highlighted in the ELR and their appropriateness for Article 4 Direction.

Table 1: Information on ELR sites regarding Article 4

Site Number	Site Name	Article 4	LB Barnet Reason/Comments
1	Queen's Road Industrial Estate	**Yes** B1a & B1c	The low cost utility space available in the estate is valuable to the local economy.
2	Falkland Road (Alston Works)	**Yes** B1a & B1c	A well utilised industrial site.
3	242-248 High Street Chipping Barnet	**Yes** B1a & B1c	Within the Chipping Barnet Town Centre Article 4 area.
4	Lancaster Road (including Redrose Trading Centre)	**Yes** B1a & B1c	The site is well occupied and provides needed services to the area but appears to be vulnerable to non-employment uses moving into the area
5	New Barnet Town Centre	**Yes** B1a & B1c	Has already experienced loss of office space to residential further loss would degrade the economic sustainability of the area.
6	Brunswick Industrial Park	**Yes** B1a & B1c	A successful estate that needs protecting to ensure employment uses are not affected by changes of use
7	Oakleigh Road South (Railway Yard)	**No**	The site is partly safeguarded for Crossrail 2 and the remainder has a heavy predominance of sui generis uses which are not impacted by the permitted development rights and therefore do not require Article 4 protection.
8	Ballards Lane	**Yes**	Within the North Finchley Town Centre Article 4 area

Site Number	Site Name	Article 4	LB Barnet Reason/Comments
	and Tally Ho Corner	B1a	
9	Whetstone Town Centre	**Yes**	Has already experienced loss of office space to residential further loss would degrade the economic sustainability of the area.
10	Finchley Industrial Centre	**Yes** B1a & B1c	The Centre is well occupied and provides trade services to this part of North London.
11	Victors Way High Street Barnet	**Yes** B1a	Within the Chipping Barnet Town Centre Article 4 area.
12	Raydean House	**Yes** B1a	The building has been identified for Article 4 as an important office block on Western Parade.
13	Coppetts Centre Colney Hatch	**Yes** B1a & B1c	The site is well functioning and provides a distribution and self storage area for the borough.
14	Pentland Building Squires Lane	**Yes** B1a	Within the Squires Lane Article 4 area which is also a Business Location. The site contains two large office type blocks and a substantial amount of parking space.
15	Mill Hill Industrial Estate	**Yes** B1a & B1c	Is reasonably well occupied and any piecemeal residential development would impact on the functionality of this and possibly on the adjoining employment site at Bunns Lane
16	Bunns Lane Works	**Yes** B1a & B1c	The site fills an important niche in the industrial land market.
17	Granard Business Centre and Churchill House	**Yes** B1a & B1c	Churchill House (Bunns Lane) is a serviced office and the wider Business Centre is well occupied.
18	Colindale Technology Park	**Yes** B1a & B1c	Well utilised business park surrounded by residential use so vulnerable to permitted development.
19	Access self storage	**No** B8	This building is greater than 500m^2 so it is not eligible for permitted development. B8 to C3 no longer has permitted development rights.
20	Access self storage	**No** B8	This building is greater than 500m2 so it is not eligible for permitted development B8 to C3 no longer has permitted development rights.
21	Garrick Industrial Centre	**Yes** B1a & B1c	The site provides a range of office and light industrial units which are well utilised.
22	Arbiter House	**Yes**	Although this building has now become a school it is situated within the Garrick Industrial Centre and to remove it would create issues regarding the continuity and integrity of the Garrick Industrial Estate Article 4.
23	61 Colindale Avenue (Public Health England)	**No**	This building in mixed use including B1b and D uses that do not have permitted development rights. It is therefore unlikely that this site could come forward for change of use under permitted development.
24	11-59 High Road	**Yes** B1a	Within the East Finchley Town Centre Article 4 area.
25	Bittacy Hill	**Yes**	Small but well utilised site

Site Number	Site Name	Article 4	LB Barnet Reason/Comments
	Business Centre	B1a & B1c	
26	Grahame Park Way – Hurricane Industrial Park	**Yes** B1c & B8	Small but well utilised site
27	Propeller Way	**Yes** B1c	Modern industrial site with a reasonable level of occupancy.
28	100 (30-120 Colindeep Lane	**Yes** B1c	Well utilised area in employment use a range of uses with a predominance of light industrial a warehousing uses.
29	North London Business Park	**Yes** B1a	This site is occupied by a range of private businesses and public sector.
30	Accommodation Road	**Yes** B1a & B1c	Within the Golders Green Town Centre Article 4 area.
31	Cecil Road	**Yes, in part** B1a & B1c	The relevant sites accessed from Cecil Road have been included into the Colindale Technology Park Article 4 designation for continuity purposes. No other sites on Cecil Road are appropriate for Article 4 protection in this instance.
32	Churchill House Brent Street	**Yes** B1a	Within the Brent Street Town Centre Article 4 area.
33	Connaught Business Centre	**Yes** B1a & B1c	Well utilised site offering a range of light industrial uses.
34	Grenville Place	**No**	This site consisted of two small office buildings in a predominately residential area one of which (Trafalgar House) has been converted into residential using PDR and now referred to as the Loft Apartments. The other still appears to be operating as B1a use; however, given the relatively small size of the property and the predominance of residential in the area it does not warrant Article 4 protection.
35	Hoop Lane	**No**	This site is comprised of railway arches and is therefore not suitable for conversion and does not need Article 4 protection.
36	Colindale Business Centre	**No**	Prior Approval has been granted on this site for both buildings to be converted to residential (14 units).
37	Popes Drive and Albert Place	**Yes** B1a	Within Finchley Church End Town Centre Article 4 area.
38	Regent Office Park	**Yes** B1a	Within Finchley Church End Town Centre Article 4 area.
39	Rushgrove Avenue	**No**	This site consists of two warehouse type buildings on two separate plots 28 & 30 Rushgrove Ave. Number 28 is being redeveloped for housing (2 x 4bed and 4 x 3bed) the other plot number 30 its current use is still a warehouse and does not appear to have any recent planning applications. The estimated floorspace places it over the 500m^2 threshold.
40	Staples Corner to 124 West	**No**	The site is not suitable for Article 4 as there are mixed uses on the site.

Site Number	Site Name	Article 4	LB Barnet Reason/Comments
	Hendon Broadway		
41	London Gateway Services	**No**	The site is difficult to access and parts of the site are not accessible without trespassing onto other sites. It is therefore unlikely to be suitable for conversion.
42	Hadley Manor Trading Estate	**Yes** B1a & B1c	The site contains a private hospital and a range of other uses. There are a number of small units within the area that provide an important type of space for SMEs
43	Utility Warehouse, 508 Edgware Road	**Yes** B1a	This is an important office block on Edgware Road, which provides an employment anchor in the area and is vulnerable to permitted development.

6.4 In order to consolidate the sites and recognise the importance of employment uses in town centres the above listed sites have been consolidated into the following Article 4 areas.

Table 2: Proposed Article 4 locations for B1a and B1c (refer to Appendix 4 for maps)

Location	Detail (Town Centre, Locally Significant Industrial Site, Business Location & Industrial Business Park are Barnet Local Plan designations)	Article 4 Use Class	Map number
Brent Street Town Centre	Whole of area covered by Town Centre boundary	B1a & B1c	1
Chipping Barnet Town Centre	Whole of area covered by Town Centre boundary	B1a & B1c	2
Falkland Road / Alston Road (Alston Works)	Existing employment area	B1a & B1c	2
Hadley Manor Trading Estate	Locally Significant Industrial Site	B1a & B1c	2
Edgware Town Centre	Whole of area covered by Town Centre boundary	B1a & B1c	3
Finchley Church End Town Centre	Whole of area covered by Town Centre boundary plus adjoining buildings on Popes Drive/Albert Place	B1a & B1c	4
East Finchley Town Centre	Whole of area covered by Town Centre boundary	B1a & B1c	5
North Finchley Town Centre	Whole of area covered by Town Centre boundary	B1a & B1c	6
Finchley Industrial Centre	Locally Significant Industrial Site	B1a & B1c	6
New Barnet Town Centre	Whole of area covered by Town Centre boundary	B1a & B1c	7
Redrose Trading	Area to south of Margaret Road (including Redrose	B1a & B1c	7

Location	Detail (Town Centre, Locally Significant Industrial Site, Business Location & Industrial Business Park are Barnet Local Plan designations)	Article 4 Use Class	Map number
Centre / Lancaster Road Industrial Estate (part)	Trading Centre Locally Significant Industrial Site and Lancaster Road Industrial Estate Locally Significant Industrial Site (part))		
Whetstone Town Centre	Whole of area covered by Town Centre boundary	B1a & B1c	8
Golders Green Town Centre	Whole of area covered by Town Centre boundary	B1a & B1c	9
North London Business Park	Existing employment area including Industrial Business Park	B1a &B1c,	10
Bittacy Hill Business Centre	Existing employment area	B1a & B1c	11
Granard Business Centre & Churchill House, Bunns Lane	Granard Business Centre (Locally Significant Industrial Site) and adjoining Churchill House	B1a & B1c	12
Bunns Lane Works	Locally Significant Industrial Site	B1a & B1c	12
Mill Hill Industrial Estate	Locally Significant Industrial Site	B1a & B1c	12
Queen's Road Industrial Estate	Locally Significant Industrial Site	B1a & B1c	13
Colindale Technology Park Colindeep Lane and sites off Cecil Road	Existing employment area	B1a & B1c	14
Brunswick Industrial Park	Locally Significant Industrial Site	B1a, B1c	15
Coppetts Centre, Colney Hatch Lane	Existing employment area	B1a & B1c	16
Connaught Business Centre and site on Hyde Estate Road	Connaught Business Centre (Locally Significant Industrial Site) and adjoining building on Hyde Estate Road.	B1a & B1c	17
Garrick Industrial Centre and Wilberforce House	Garrick Industrial Centre (Locally Significant Industrial Site) and adjoining Wilberforce House	B1a & B1c	17
Propeller Way	Existing employment area	B1a & B1c	18

Location	Detail (Town Centre, Locally Significant Industrial Site, Business Location & Industrial Business Park are Barnet Local Plan designations)	Article 4 Use Class	Map number
30-100 Colindeep Lane	Existing employment area	B1a & B1c	18
Hurricane Industrial Park	Existing employment area	B1a & B1c	19
Utility Warehouse, 508 Edgware Road,	Existing employment area	B1a	20
Squires Lane	Business Location	B1a & B1c	21
Raydean House Western Parade	Existing employment area	B1a	22

7.0 Conclusion

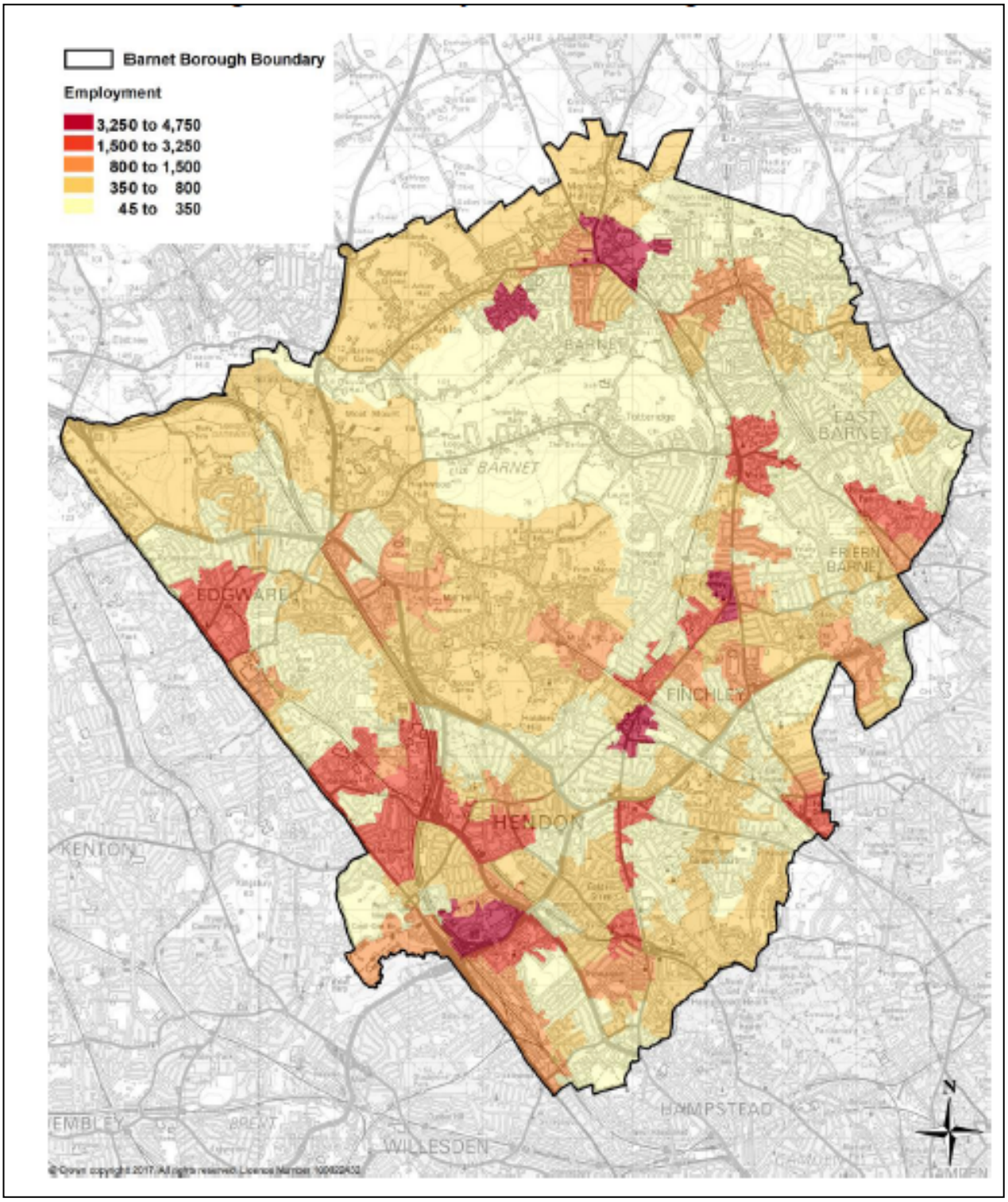
7.1 The town centres, and employment sites identified for the Article 4 Direction protection have been selected for their importance to the economic sustainability of Barnet. The number of Article 4 areas being proposed indicates the dispersed nature and variety of employment sites in Barnet, however it also demonstrates the careful consideration that has been given to identifying sites appropriate for Article 4 Directions for B1a, B1c, and B8 uses, and that exceptional circumstances exist to justify the making of Article 4 Directions in these areas.

7.2 Several of the town centres include the specific sites identified in the ELR it is important to retain employment in these centres as they represent an important aspect of the economic well-being of Barnet and contain a variety of jobs at various skills levels.

7.3 The decision to identify these town centres, employment areas, and individual sites for B1(a), B1(c) and B8 Article 4 protection is also in conformity and consistent with the requirements of both the NPPF, current London Plan and emerging London Plan policies. Given the pressures on employment land in the Borough the Council therefore considers it is justified in recommending this intervention.

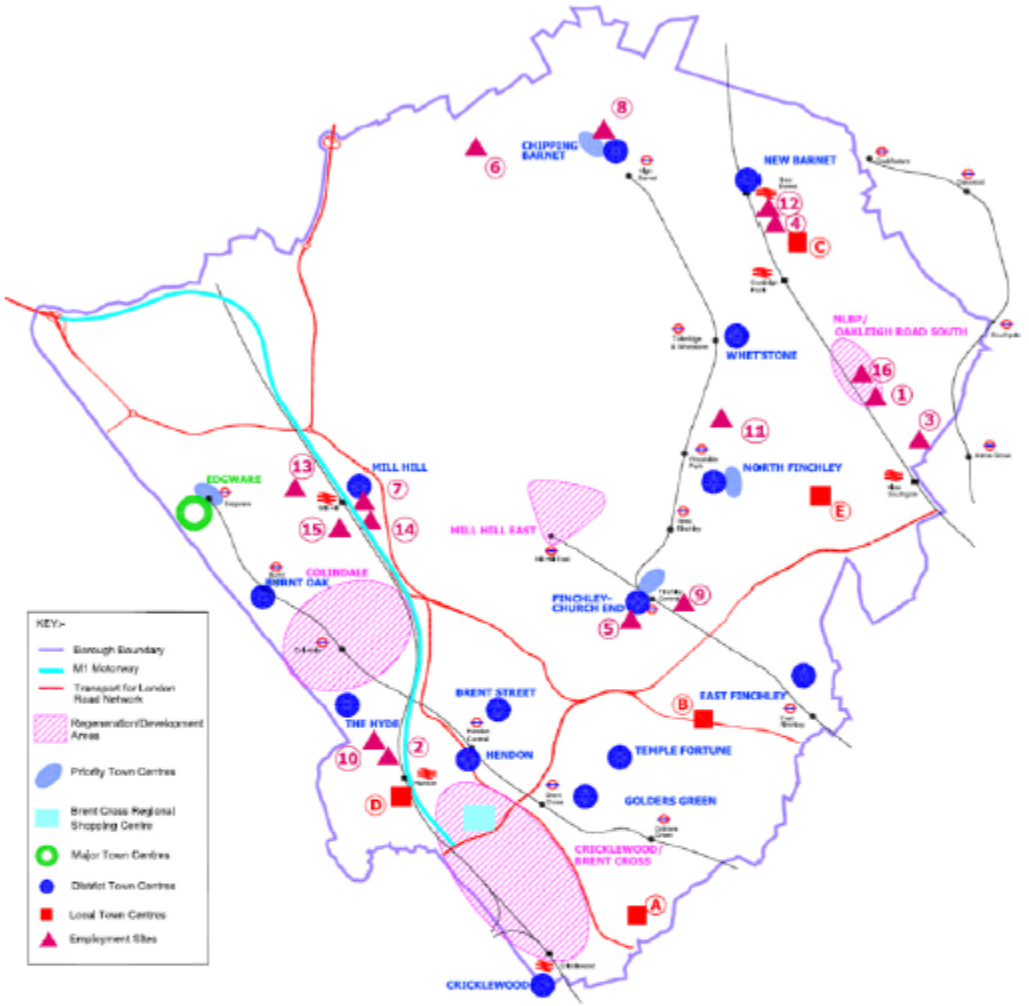
7.4 Barnet is continuing to deliver a challenging housing target, the Article 4 Directions will assist in the future delivery of an appropriate balance of homes and employment uses by ensuring the efficient use of land to enable the Borough to meet the needs identified in the Local Plan.

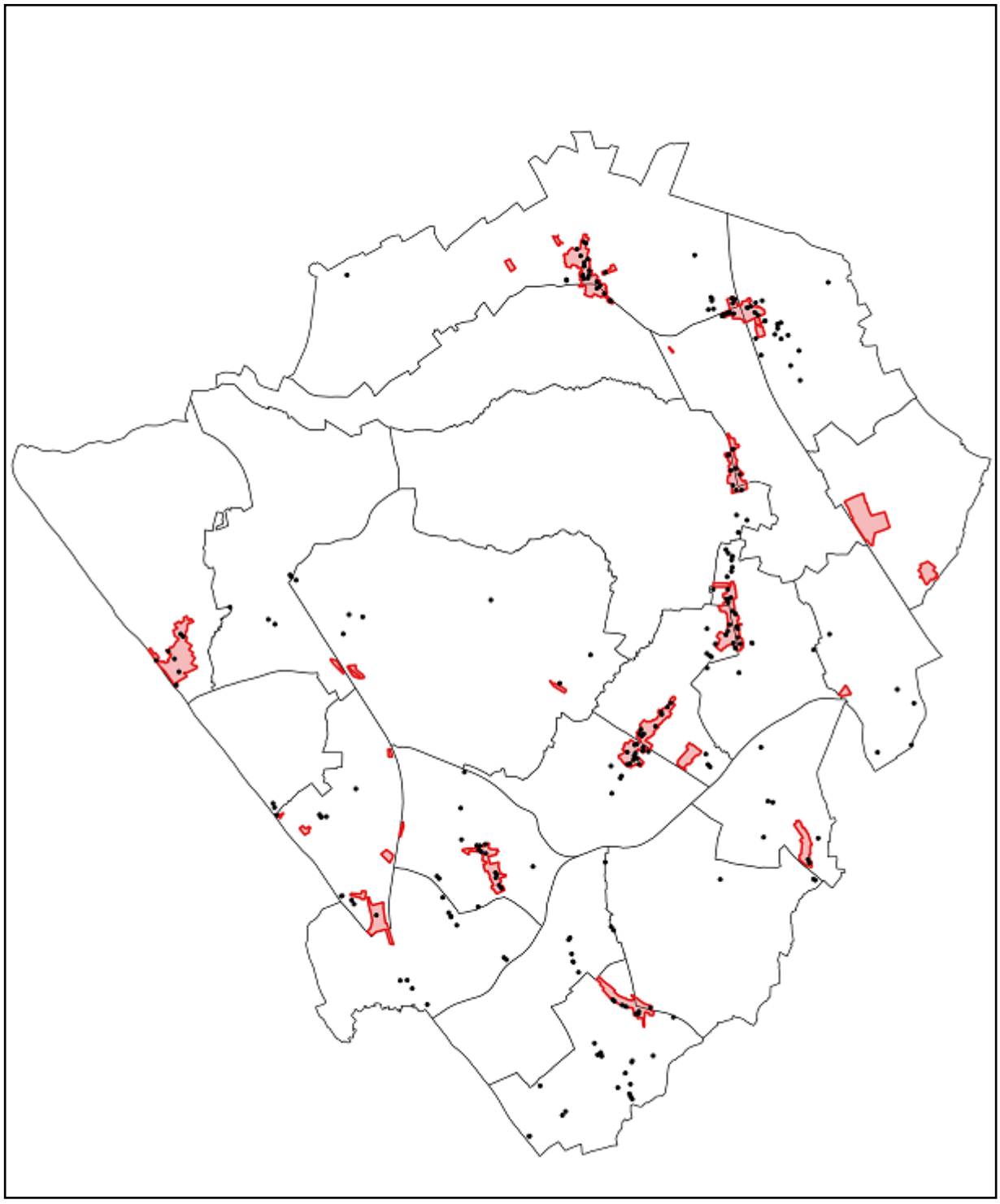
Appendix A: Job density in London Borough of Barnet



Appendix B: Map of Barnet's town centres and employment sites

Map 9: Town centres and employment sites



Employment Sites		Site	Name
Site	Name	12	Red Rose Trading Centre
1	Oakleigh Road South	13	Grenville Place
2	Garrick Industrial Estate	14	Bunns Lane
3	Brunswick Industrial Park	15	Granard Business Centre
4	Lancaster Road Industrial Estate	16	North London Business Park
5	Regents Park Road	Local Town Centres	
6	Queens Road Industrial Estate	Site	Name
7	Mill Hill Industrial Estate	A	Childs Hill
8	Hadley Manor Trading Estate	B	Market Place
9	Squires Lane	C	East Barnet
10	Connaught Business Centre	D	West Hendon
11	Finchley Industrial Estate	E	Friern Barnet

Appendix C: Map of B1a B1c & B8 Prior Approvals approved in relation to town centres and employment sites