FAO Mr. Vincent Maher – Planning Inspector

IBSA Representations – Matter 4 'Live/Work'

Dear Mr. Maher,

Thank you for the opportunity to combine comments from the recently implemented 'National Planning Policy Framework' (NPPF) with our representations on the matter of 'Live/Work', and reference to this mode of occupation in the LB Barnet Local Plan.

Whilst, from our perspective, there was little enthusiasm for adopting any reference to the concept generally termed 'Live/Work' within LB Barnet's Local Plan during the Examination in Public, we remain convinced, and all the more so now in light of the new NPPF, of the importance of referencing property specifically designed to combine both residential and employment space as a key component in delivering sustainable development.

Currently there are over 620 residents of LB Barnet who work within IBSA/Watchtower in what could be described as 'a dual use environment for both residential and employment purposes' and it is the preference of IBSA/Watchtower to consolidate activities in LB Barnet more closely so as to better conform to this ideal.

Thus, we consider that the LB Barnet Local Plan should include reference to property specifically designed for dual use, which combines both residential and employment space, and by means of appropriate policy statements actively support this means of promoting sustainable development.

Please note that we are not seeking specific reference to the term 'Live/Work' – the precise words used are relatively unimportant. However, the concept, the principle, and the aspirations embodied in such a term ought to be acknowledged and/or supported within LB Barnet's Local Plan, particularly as such property operates conspicuously in the area and in a manner which is clearly in harmony with the recently implemented NPPF.

This representation is structured using four main headings:

- 1. Addressing Current Perceptions of 'Live/Work'
- 2. 'Dual Residential/Employment Environments' Harmonise With NPPF
- 3. IBSA/Watchtower Property Exemplifies Combined Employment/Residential Uses
- 4. Encouraging Appropriate 'Live/Work' in LB Barnet

Addressing Current Perceptions of 'Live/Work'

We wish to acknowledge that the development of what have been termed 'Live/Work' schemes has been abused widely and used as a basis for permitting housing where it might not have been previously allowed.

We understand that there are sound reasons why the current perception of 'Live/Work' among some local planning authorities can be negative, which is why we have chosen to use a mix of terms with reference to the land use and sustainability ethos exemplified by IBSA/Watchtower.

It is not the inclusion of the specific term 'Live/Work' which is sought, with its acquired negative perceptions and possible misuse. It is the idea the term conveys, with its sustainability benefits that 'sit well' with the NPPF, which requires appropriate mention.

Regardless of the perception that some have regarding so-called 'Live/Work' schemes, the NPPF supports the objectives and aspirations of development which integrates employment and residential uses, reducing the need to travel, minimises the carbon footprint and promotes sustainable land use objectives.

Thus we seek acknowledgement within the LB Barnet Local Plan that the principles and aspirations associated with property specifically designed for dual use combining both residential and employment space is already being 'lived out' very prominently within the Barnet community and that such existing use aligns well with the recently implemented NPPF guidelines.

Additionally, we would appreciate wording which is supportive of such land use into the future, particularly as further expansion of IBSA/Watchtower facilities is already acknowledged within current LB Barnet forward planning documents (Mill Hill East Area Action Plan).

'Dual Residential/Employment Environments' Harmonise With NPPF

Elements of the NPPF support the inclusion of dual land uses combining both employment and residential space within a suitable policy framework for a Local Plan, as follows:

Paragraph 14: The NPPF is built around a presumption in favour of sustainable development. Indeed, this should be the "golden thread" running through plan making and decision taking.

Paragraph 15: Local Plan policies should "follow the approach of the presumption in favour of sustainable development.." and have "...clear policies that will guide how the presumption should be applied locally".

Paragraph 17: Mixed development should be promoted and patterns of growth should be managed so as to make the fullest possible use walking, cycling and public transport with significant development being focused in locations which are, or can be made sustainable.

Paragraph 21: The planning system should "facilitate flexible working practices such as the integration of residential and commercial uses within the same unit"

Paragraph 29: The 'smarter use of technologies can reduce the need to travel'.

Paragraph 37: 'Planning policies should aim for a balance of land uses within their area so that people can be encouraged to minimise journey lengths for employment..".

Paragraph 38: "for larger scale residential developments in particular, planning policies should promote a mix of uses in order to provide opportunities to undertake day-to-day activities including work on site"

NPPF references such as these show clear support for the principles, the ethos, and the ideals of 'Dual Residential/Employment Environments' and give added reason for noting and promoting this mode of occupation within the LB Barnet Local Plan.

IBSA/Watchtower Property Exemplifies Combined Employment/Residential Space

The IBSA/Watchtower facilities extend the concept of dual residential and employment use beyond a home office into a truly sustainable 'Live/Work' concept. It is part of a collection of facilities renowned globally for employing sustainable means of operation.

IBSA/Watchtower is seeking to expand by providing not just single units of mixed residential and commercial, but to enlarge its existing dual use facilities which have operated very successfully within LB Barnet for over 50 years.

We consider that dual use of land for residential and employment purposes should be recognised as one of a number of key building blocks for sustainable development within the LB Barnet Local Plan. Furthermore the approach of IBSA/Watchtower in relation to this concept should be the subject of comment in the LB Barnet Local Plan, particularly as the principles of this mode of occupation are obviously consistent with the NPPF.

Sustaining Appropriate 'Live/Work' in LB Barnet

As previously stated we acknowledge that the development of so-called 'Live/Work' schemes has been abused in the past and understand the concerns that may have underpinned the tension that seemed to exist amongst LB Barnet representatives regarding the inclusion of the term 'Live/Work' within the Local Plan.

However, we consider that the inclusion of 'Live/Work' as a principle or concept within the LB Barnet Local Plan could be so termed and worded as to acknowledge and facilitate the key role this approach to land use already plays significantly in the locality.

With the provisions of the recently implemented NPPF in mind, the determination of mitigating measures against abuses of policies which encourage a combined use of land for employment and residential purposes needs to be accorded serious consideration, particularly as this mode of land use 'sits' so comfortably with the NPPF guidance for achieving sustainable development.

Conclusion

Pursuant to the above comments, and in harmony with the recently implemented NPPF, we respectfully urge the revision of the LB Barnet Local Plan to not only include reference to property specifically designed for combined dual employment/residential use, but to actively support this opportunity to promote sustainable development where practical, by means of supportive policy statements.

Thank you for this further opportunity to comment on the LB Barnet Local Plan.

Yours sincerely

Andrew Holland on behalf of IBSA/Watchtower by e-mail on 15 May, 2012