

Warehouses of Harringay Association of Tenants (W.H.A.T)
Submission to Haringey Local Plan Consultation
March 2015

W.H.A.T response: Site SA38 – Overbury & Eade Rds

Introduction

This document responds to the consultation on Haringey's proposed Local Plan, including the Proposed Alterations to Haringey's Adopted Strategic Policies, Development Management Development Plan, Site Allocations Development Plan and the Tottenham Area Action Plan Development Plan.

WHAT is a residents group composed of warehouse residents across the sites SA34, SA36, SA37 and SA38. We meet on a weekly basis to compile and co-ordinate the voices of warehouse residents to ensure the continuation of our community and its improvement.

The following document sets out our broad response to the suite of policies proposed within the above documents, and then details responses to specific policies. This document pertains to the policies affecting site SA 38 specifically (and some wider policies proposed in the plans). **WHAT are also submitting separate responses specific to sites SA 34 and SA36.**

Overview

- We note a positive shift in Haringey Council's approach to the warehouse sites, reflected in the significant changes made to the Site Allocations Document and the Development Management policies since the last consultation in 2014, which now recognise that the needs of our existing community need to be met and that residents wish to remain in the area. We are pleased that the documents also note the important contribution the community can make to the area, providing jobs and places to live and work that are more affordable than many other places in the borough and wider London.
- We do not wish to see the sites changed to an overall designation of residential, as we recognise that this would create a large uplift in the value of the land, which would threaten our continuing existence on the sites. We support the application of planning policies which allow a continuation of live/work across all inhabited units of the sites.
- The site allocations stipulations for Omega Works, Arena Design Centre and Overbury/Eade Roads appear to place increased emphasis on large scale re-development, despite the positive stipulations for retention of the existing community also included. As residents of the site, we wish to see existing buildings retained, improved and regularised, and where evidence suggests that this is not possible we would seek assurances that the essential character, the flexible live/work space, the industrial aesthetic and the needs of the current community are preserved, particularly the need for affordable rents. Any plans for re-development must be considered in full partnership with the inhabitants of the sites.

Site SA38 specific representations:

Site allocations DPD: pg. 15 (un-named) employment land grid - SA 38

The site allocations document stipulates that the employment floor space of site SA38 amounts to 17,900m², and that this amount of employment floor space must be retained within any plan for the future of the site. The warehouse residents' group does not support this policy for three reasons;

- We have not seen evidence to justify the stipulation that the site contained 17,900m² of active employment land, nor a specified period in the history of the site upon which this stipulation is based. This figure does not reflect the current usage, which is predominantly live/work. The only known pure commercial occupiers are at units 1, 2 and 3, 199 Eade Road, and the ground floor of Unit E, the remaining are flexible live/work space.
- We do not believe that a full return of 'original' employment land to the site is feasible or desirable. The employment now taking place on the site has a higher density, and makes a more valuable contribution to the social and economic life of the borough. The pressure placed upon the sites by a requirement of a full return of employment land would undermine the unique balance of live/work existing there, which has developed over time to meet the requirements of a mix of creative enterprise and affordable living. This organic development is not replicable through the blunt instrument of sweeping external intervention.
- The development required to accommodate such an increase in employment land, while retaining the residential provision for the current community (an objective stated by the site allocations) would necessarily undermine the industrial aesthetic and flexible space that is appealing to residents of the site. Large scale interference into this unique aesthetic - cum - spatial characteristic is likely to impact upon its appeal as a creative and cultural hub, undermining a key foundation of the existing community.

We believe that aspirations for increases in employment land should be based upon the current m² of employment floor space on site, rather than an unevidenced assumption from an unspecified point in the past, which does not recognise the differences in density between previous and current employment activity.

We wish to see the balance of live and work currently on the sites retained, by a policy that neither drives an uplift in value of land, nor forces its wholesale redevelopment to accommodate an overwhelming increase in commercial floorspace.

Site allocations DPD: SA 38 Site requirements, pg. 107, line 4

“Re-introducing employment generating uses is the key aim of this policy. These may be created at ground floor level as part of a mixed-use development”

- In August 2014 WHAT residents' group submitted an independent report to Haringey Council's Planning Department, researched by a group of academics from LSE University. This report provided qualitative evidence of the significant economic value that the current mix on the site holds for the area and the site's inhabitants. The report supports the argument that the site provides a unique space for the incubation and development of small-scale creative enterprise of value to the

residents of the site and the wider borough. In short, it points to the current employment generation on site. Neither receipt of this report, nor the significance of its findings were acknowledged by the Council at the time of submission. It is attached again alongside this document as evidence.

- As per the above comment relating to pg. 15 we do not wish to see the enforcement of a large-scale increase of employment land on the site. This would undermine the fragile ecosystem of creative enterprise and affordable accommodation which makes the site unique. We believe that the existence of this creative hub is a huge asset to the attractiveness of the borough to other creative enterprises, stimulating future job-creation alongside the dense existing network of creative entrepreneurship and collaboration.
- Development to introduce a structural division between the live and work floorspace would undermine the flexibility that inhabitants of the community find both useful to their employment activity and an appealing environment in which to live. The current spatial arrangement supports a flexible, social environment of residential habitation and creative entrepreneurship and collaboration. These benefits are evidenced by qualitative interviews with site inhabitants collated in the independent LSE University report attached alongside this submission.
- Following the above point, we believe that an extension of the conditions placed upon Unit 4, 199 Eade Road in its recent planning hearing to other units would support retention of active commercial floorspace for the purposes of economic activity, complimenting the current commercial/residential mix that is so essential to the unique character of the site. These planning conditions ensured that a significant proportion of the floorspace was available for commercial activity within working hours, without requiring large structural changes to the space such as a division between commercial and residential floorspace in the form of floors for different purposes.

Site allocations DPD: SA 38 Development guidelines pg. 107, line 4

“Planning obligations to open up the south bank of the New River and institute a linear park should be explored through this development”

- We note the Council are considering re-purposing the south bank of the New River to create a community asset. The residents of the warehouses would be keen for the space to be developed into a community allotment garden, which could be used to grow organic produce, and to provide training in horticulture and the growing of food to the wider community. This would extend the outreach currently taking place directly opposite at New River Studios. We would be keen to discuss this plan further with the relevant parties should the Council wish to consider.

Development Management Development Plan Document: Policy DM51 Warehouse Living (pg. 82)

We are pleased to note the development of a planning policy addressing the specific needs of residents of warehouses in Haringey, the culmination of W.H.A.T's engagement with Haringey Council regarding the important contribution our sites make to the borough.

- We support the principle stated in point (c) of the policy towards the retention of the warehouse communities' existing and future accommodation needs.
- We support the point (e.) III which recognises the need for low cost-workspace and affordable residential accommodation on the site to support the existing start up and creative sectors.

We do however have the following concerns regarding the policy in its current form.

- We recognise and tentatively support the need for the masterplan approach detailed in section (b) of Policy DM51 to protect the character of sites, and ensure that residents are living in safe and comfortable conditions. However, we believe that a one-size-fits-all approach may put the residents living at warehouse sites with a more complex ownership and management structure at a disadvantage (such as those as Fountayne Road). We ask that the council supplement this stipulation by putting in place a plan for working with residents of these sites towards regularisation and to stimulate co-ordination between the multiple owners of the land, in consultation with its inhabitants, to develop a masterplan which accommodates the needs of the existing community.
- Section (j) of the policy stipulates the need for a plan for the management and operation of the warehouse living spaces. WHAT residents group support an expansion of a co-operative leasing model, by which a resident-controlled, not for profit co-operative takes management of more long-term leases of units across the sites. This would drive the retention of a genuine inter-relationship of the living and working elements by aligning the interests of inhabitants with the management of the spaces which they occupy, acting as a further barrier against any potential shift in emphasis within the internal structure of units towards higher residential occupation. A not-for-profit management structure would also help to mitigate upward pressure on rents. Residents from the sites have already registered a housing co-operative with the FCA, which is appropriate to take this on. We would also like to see an increase in affordable workspaces leased to workers' co-operatives and other mutual models. We request that the Council supports the expansion of this model when considering management plans for the site (s).

Representations regarding wider policies proposed under the Local Plan consultation

Proposed Alterations to Haringey's Adopted Strategic Policies: Policy SP2 – Housing, pg. 55

- The 'proposed alterations to the strategic policies' document stipulates a reduction in the affordable housing expectations for the borough from 50% to 40%. We note that this 40% 'affordable' (i.e. at 80% market rate) target itself does not stipulate a requirement for any socially-rented housing as part of any future development proposals. The warehouse community grew from a lack of affordable space in London, with the majority of residents moving to the sites due to their relative affordability in comparison to the wider private-rented sector and rented creative/commercial spaces. Local authorities are the primary guardian of continuing affordable housing stock in the city. Haringey council should maintain its aspiration to achieve 50% affordable housing from any development and include a

requirement for contributions to the borough's social housing stock from future development.

- Further to this point, we are extremely disappointed to note that Haringey's proposed plans suggest a reduction in the total socially-rented housing stock within the borough. This points to a Council disregard for its vital role in supporting genuinely affordable housing in the borough. Stock which allows low income households to continue to live here and which contributes to a vibrant, diverse community to the benefit of all its inhabitants.

Site allocations DPD: Site SA 36 Omega Works

“A pedestrian link [from Omega Works] to Finsbury Park Avenue should be considered as part of any future redevelopment”

- We strongly support the retention and preservation of the ‘SINC’ ecological corridor which runs behind Omega Works, the Crusader Industrial Estate and Arena. These slopes represent an important ‘Green Lung’ for species of birdlife, insect and larger mammals in this area and connect to the nature corridor which runs along the Barking-Gospel Oak Overground Line. This site was previously overcome by invasive species such as Japanese Knotweed and Bramble, as well as evidence of fly-tipping. Action from local residents has seen certain patches on the slopes cleared of invasive species and tipped rubbish removed from the site. We are concerned that the introduction of a pedestrian link between Omega Works and Finsbury Park Avenue, and the increased pedestrian traffic that this would encourage, would threaten the sensitive biodiversity and ecological value of the slopes.

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