

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

W.H.A.T response: Site SA34 – Arena Design Centre

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 36 and SA 38.**

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 SA34 specific representations:

Site allocations DPD: pg. 15 (un-named) employment land grid - SA 34

The site allocations document stipulates that the employment floor space of site SA 34 amounts to 4,600m², 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 assertion that the site contained 4,600m² of active employment land, nor a specified period in the history of the site upon which this is based. This figure does not reflect the current usage, which is predominantly live/work. There is only one unit occupied purely for commercial use – Rossi Stoneworks - 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 has attracted existing residents to the site. Large scale interference into this unique aesthetic/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.

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 34 Site requirements, pg. 99, line 7.

“Reintroducing 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, and the employment opportunities this provides both the residents of the site and the wider borough.

- Development to introduce an artificial structural division between the live and work floorspace would undermine the flexibility that inhabitants of the community currently have to utilise space in a creative, and collaborative way. This is a key feature of current warehouse living, and something we believe is integral to the function of the sites as creative live/work hubs evidenced by the academic study referred to above.
- 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, complementing 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 to create an artificial divide between live and work space.

Site allocations DPD: SA 34 Site requirements, pg. 99, lines 1-2, 10.

“None of the buildings need to be retained by the Council wishes to explore options to retain the existing population on this site.”

“The quantum of dedicated employment floorspace on the site should match that originally build on the site. Other uses will be permitted to cross subsidise the employment and warehouse living uses.”

- We have serious concerns about the combined implication of these requirements for the Arena site and existing residents.
- One interpretation of these requirements would be that it allows for complete removal of existing live/work warehouse spaces as discussed above, to be supplanted by high-density residential units and distinct purpose-built employment spaces.
- For the reasons given above we would completely oppose such a shift.

Site allocations DPD: SA 34 Development Guidelines, pg. 99.

- We note that guidelines for site SA 34 omit a requirement included within the development guidelines for site SA 38 that: *“Developments that continue to support the principles of communal living will be supported”*.
- We are concerned about the implication of the omission of this requirement from the Arena site requirements, that communal living is not something envisaged for the future of residential use on the site. For the reasons discussed above we would wish that this requirement was also included within the SA 34 Development Guidelines.

Site allocations DPD: SA 34 Development Guidelines, pg. 99, line 6.

“Development should enhance the ecological corridor to the north of the site.”

- We fully support the requirement for the conservation and enhancement of the ecological corridor. 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.

“This site is identified as being in an area with potential for being part of a decentralised energy network.”

- We strongly support the development of decentralised clean energy schemes, and would advocate that these be done in partnership with existing residents and the local community in order to provide new opportunities for meeting local energy needs and providing cleaner, cheaper energy to local residents.

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 WHAT’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 development a masterplan which accommodates for 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 requests 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.

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