

OBJECTIONS TO PLANNING APPLICATIONS HGY/2023/0570 AND HGY/2022/4310

1. Planning Applications

1.1 Omega Works A - HGY/2023/0570

- 8 x warehouse units – 67 bed spaces (incl. 7 accessible) – 2759sqm
- 76 x residential units (approx. 211 people) – approx. 4500sqm
- 8 x commercial units – 1041sqm

1.2 Omega Works B - HGY/2022/4310

- 36 x residential units
- 7 x commercial units (610sqm)

2. Assessment

Principle of Warehouse Living and Employment Use

- 2.1 The principle of warehouse living is legitimised and supported through Policy DM39. Part C states that proposals will be supported for warehouse living that form part of an agreed masterplan to increase and diversify the employment offer of employment areas whilst providing an appropriate standard of living for the integrated residential element. Although a masterplan has been provided, this is solely the desktop thoughts of one developer and is not a true masterplan which should be thoroughly consulted on in the wider community, put together by multiple agencies and should be formally submitted and adopted by the Council. The whole of Haringey Warehouse District and other local stakeholders should have been consulted and worked together with during the pre-application stage for such a far-reaching proposal. This masterplan appears to have been quickly put together and railroaded through by a single developer as a tick-box exercise. The proposal would not provide attractive or practical routes through to the north – it would only allow unattractive leftover spaces as afterthought ways through.
- 2.2 Contrary to above and part D (d), it is unclear whether the proposals would increase and diversify the employment offer of the sites, given it is unclear if all of the existing businesses and workspaces have been properly accounted for. Warehouse living is a noise-generating use in relation to the home working aspect along with the social and cultural setting which facilitates events involving music and gatherings. The proposal would not maintain the established standard of warehouse living as it would effectively be diminished and whitewashed away by the noise complaints and policing by site management, contrary to part C.
- 2.3 Part D of the policy details how development proposals involving warehouse living will be assessed. In regard to D (b), existing residents dispute that the baseline employment provision has been established correctly. Furthermore, the reprovision of the host community is inaccurate as the number of residential tenants has been underestimated, demonstrating a lack of understanding of

warehouse living in Haringey Warehouse District. To allow a scheme to progress which has not properly accounted for existing tenants would be going against the thrust of policy DM39.

- 2.4 In regard to D (c), the applicant has not established the host community's existing and future accommodation needs for creative living and working. They have only guessed from afar and established their own desktop estimates without sufficient experience or understanding of the unique, creative living and employment situations on the site and surrounding area.
- 2.5 The proposal would be contrary to D (e), as no proper grassroots consultation, dialogue and research has taken place to establish what kinds of workspaces, affordability of workspaces and affordability of housing are on the site. No proper consultation has taken place with all existing businesses, most of which significantly positively impact on local creativity in this Creative Enterprise Zone, where such uses are to be promoted and protected.
- 2.6 Affordable employment workspace should be provided in line with London Plan policy E3 as the site is located within a Creative Enterprise Zone. This policy further states that the Mayor of London will encourage the delivery of new workspace for SMEs, the creative industries, artists and the fashion industry within new residential and mixed-use developments. He will also provide assistance to artists and creative businesses through the Mayor's Creative Enterprise Zones and promote schemes that provide linked affordable housing and affordable workspace in new housing development. This policy therefore supports the current model of warehouse living which mixes affordable living with creative home-working and social/cultural life whereas the proposal would ruin this. The provision of only 1 unit of affordable workspace (20% of 610sqm in Omega B) across both sites is far too low and out of character, only promoting social cleansing of the site. The existing warehouse workspace is inherently affordable, which is why such a unique ecosystem has been established. It is unacceptable for Omega A not to provide any affordable workspace and the proportion and affordability of that provided for Omega B is insufficient and out of character.
- 2.7 Creative and cultural uses on the site should be retained and promoted with costs provided for start up and relocation. Specifically, the uses of the commercial floorspace should be narrowed down to creative/ cultural uses most suitable in the CEZ, rather than being open and flexible, where any generic, most-profitable Class E use would take precedence – this is vital in upholding the warehouse character.
- 2.8 Any proposal would need to clearly define an affordable warehouse living product at submission stage, liaising with residents, ensuring that the affordability is secured in perpetuity for the site. An acceptable scheme should also decant existing residents and businesses to another part of the site as part of a phased development along with providing funding for moving and setup costs. This would all need to be detailed upfront in close consultation with existing residents and secured as part of a s106 legal agreement. The proposal for Omega A has included the warehouse element as 'affordable' and has benchmarked this rate as £1000 per month per room. This rate per room is similar to what many would search for as a one-bedroom flat, not for a bedroom on its own. £1000 per month for a bedroom is a very expensive rate for one bedroom in a shared flat, even for London standards and it would be a headline mockery of planning policies for this to be regarded as any kind of affordable provision. £750 per month (including bills) is a more realistic average rate for a warehouse room, although many would

be cheaper than this. These realistic rates should not be defined as 'affordable' either. The benchmark affordable rate should be derived from a similar product – warehouse units in Haringey. The average rate should not be based on conventional housing, especially not new build. Following on from the above, it would also be difficult to enforce that home work spaces are used for work with such an exclusive rent, rather than the inclusive and affordable nature of warehouses, which promotes flexible co-working.

- 2.9 The proposal is contrary to D (f) and (g), as conventional housing is not compatible directly adjacent to warehouse living, as evidenced by complaints from neighbouring residents off-site for the reasons above and below. These uses operating organically and directly adjacent would effectively cancel each other out.
- 2.10 The proposal is contrary to D (h), as the building specifications for the workspace and residential elements show a lack of understanding of existing tenants. Communal amenity space to be shared between warehouse tenants and conventional residential units would be incompatible. Outdoor group social events are established in warehouse communities generally, not just Haringey. Outdoor food, drinks and music events are common in such spaces and would not be tolerated in close proximity to conventional housing. In the car park behind New River Studios for example, loud music days are regularly tolerated and enjoyed by surrounding warehouse tenants whereas on-site guards of housing tenants would quickly put a stop to such creative action. The children's play space also being adjacent to these spaces is further laughable as a realistic prospect of maintaining warehouse living. Cycle parking has also been crammed within warehouse units, which is not acceptable in regard to contemporary standards, epitomising symptoms of overdevelopment. Ground floor warehouse living windows (especially without any defensible space) would offer a poor standard of accommodation by way of lack of privacy and mutual overlooking.
- 2.11 The warehouse units proposed do not bear resemblance to warehouse living in the area. Warehouse living is characterised by a high degree of flexibility, customisation, high ceilings, ceiling light, very large communal spaces indoor and outdoor, live/work areas, potentially households of 20 and more. The proposed warehouse units are simply undersized normal dwellings. The unique creative businesses on the site are also not specifically catered for appropriately in the redevelopment and have only been shown in a tokenistic desktop manner. The recording studios on-site are one example of a creative business which has not been properly accounted for with their unique needs in the scheme. Significantly higher levels of acoustic mitigation would need to be especially purpose built. The businesses on the site would be lost to the site, having to move, removing its character.
- 2.12 It is considered that the proposal is contrary to D (i), as it is not aligned with the objectives of the site allocation which seeks an employment-led and maximised scheme along with warehouse living accommodation. Crucially there is no mention of conventional residential housing for this site allocation. For the Crusader Industrial Estate site allocation within Haringey Warehouse District it is stated that '*if necessary cross subsidy of employment floorspace from residential will be considered.*' This is not mentioned in the Omega Works site allocation. Policy SP8 mentions the potential of residential within Regeneration Areas (of which Omega Works is a part of) by stating that '*in principle, mixed use development including residential, employment and community facilities may be appropriate in some Local Employment Areas.*' It is considered that although residential may be appropriate in some parts of the Regeneration Area (such as

Crusader Industrial Estate for example), it is not appropriate at Omega Works, where the priority is clearly focused on, and rationally driven to promote and protect employment space and warehouse living specifically.

- 2.13 For the reasons above in relation to the essential character of warehouse living and existing creative businesses not being protected, the proposal would be contrary to D (j). It is also unclear so far, whether servicing and parking requirements are acceptable in regard to D (k).
- 2.14 In regard to D (l), no viability information has been made public about whether an employment-led scheme re-providing warehouse living would be viable or not. It seems wholly logical that a profitable scheme for the above could be put together, rather than lumping straight for a conventional housing led and focused scheme solely because it is the most profitable thing that could be put on the site, rather than trying to meet the employment-led aims of the site allocation, Creative Enterprise Zone and retaining the unique character of the Haringey Warehouse District.
- 2.15 Supporting text of DM39 further states that *'the policy seeks to further regularise/legitimise this use, and through the planning process, ensure existing and future occupants are provided with an appropriate standard of living; the existing creative industries and SME sectors are supported and given room to grow; and the creative living and working offer of these sites is maximised. The expected outcome is to secure a long-term sustainable economic future for these employment land sites that builds on the amenity being created and complements the unique character of the areas in which they are situated.'* The proposal would certainly fail the policy aims, creating simply another soulless production line housing development. Existing warehouse residential and commercial tenants would simply move to another warehouse rather than move to such a restrictive living environment.
- 2.16 The site allocation states that a pedestrian connection to Finsbury Park Avenue should be considered and included in future designs for the site but the masterplan has not shown this from Omega Works, even though it is feasible. The central façade should create a gateway through the site which connects west to the new pedestrian connection. The proposal has not followed this guideline so that it can overdevelop the site without providing local strategic aims. The site allocation also maintains that *'buildings in this area should continue to be designed to maintain the unique warehouse character of the area.'* The scheme appears to produce a gated community, fostering an exclusive atmosphere. Local views showing the proposed buildings should be provided to test interactions with the surrounding townscape at various points and nearby heritage assets such as locally listed buildings to the south. 3D massing model views from bird's eye vantage points should also be provided in order to show the proposals in their full context. In summary, the design of the proposal appears to be contrary to policy D3 of the London Plan, as well as DM1, DM3. The scheme also does not meet the target urban greening factor score of 0.4, contrary to London Plan policy G5. The development would appear to constitute overdevelopment.
- 2.17 For the reasons above, it is considered that the proposal is contrary to policy DM37, DM38, DM39, the aims of the Omega Works site allocation, as well as London Plan policies GG4, E2, E3, E7 and E8.

Principle of Conventional Housing Use, Quality of Accommodation and Need for Affordable Housing

- 2.18 In regard to the provision of conventional housing (98 units) on the site, as already mentioned above, this is technically allowable but not specifically called for. If warehouse living is to be catered for properly and allowed to continue in its authentic manner as a priority, as it should be, and as the Local Plan has prioritised in writing, then the conventional housing would suffer from an unacceptably poor quality of accommodation. The continuation of authentic warehouse living on the site is incompatible with conventional housing and would result in conventional housing suffering from excessive noise, nuisance, activity and disturbance, symptomatic of site overdevelopment. This could also lead to private open spaces, communal amenity spaces and children's play spaces being unusable and windows being unopenable, due to noise, which could result in overheating. Therefore, the conventional housing element of the proposal would be contrary to London Plan policies D3 (Optimising site capacity through the design-led approach), D6 (Housing quality and standards), D14 (Noise), SI 4 (Managing heat risk), also local policies DM3, DM12, DM21,
- 2.19 The site is located within Area of Change (Seven Sisters Corridor). Policy SP1 details Seven Sisters Corridor Aspirations as *'potential for new housing and social infrastructure including, where appropriate and viable, the provision of new green space and community facilities.'* Furthermore, it is stated that *'the area is, however, characterised by high levels of multiple deprivation including unemployment, low educational achievements, poor/lack of affordable housing, a poor environment and high crime levels. It is therefore no coincidence that this area is also recognised as being within the 10% most deprived in England.'*
- 2.20 Policy DM13 requires the provision of affordable housing for sites of 10 or more residential units with a borough wide target of 40% affordable housing on-site, subject to financial viability testing. However, the London Plan policy H5 allows provision of 35% affordable housing on-site not to require viability testing if the housing unit mix and tenure split aligns with local targets. The proposal does not provide any affordable conventional housing even though 98 residential units are proposed. This is wholly unacceptable, resulting in a scheme which is not inclusive, balanced or sustainable and not meeting the acute housing needs of the borough or London as a whole. The only possible inclusion of conventional housing on the site should be if it was totally hidden and separate from the warehouse living. There is too much going on in the site, evidencing overdevelopment with various needs not being sufficiently met all around the board. One example of an employment and cultural-led scheme which incorporated housing would be the recent Joiners Arms planning application (Tower Hamlets planning reference number PA/20/00034) which was a which safeguarded an LGBTQ+ pub on-site and provided only 9 residential units).
- 2.21 The proposed development appears to be aiming to justify lack of affordable housing provision by providing warehouse living, even though the warehouse living has not been proven to be an affordable product. Such a proposed housing mix does not meet the needs of the warehouse living community or general housing needs of the borough. Therefore, the proposal would also be contrary to policy DM11 along with DM13 and London Plan policies GG4, H4, H5, H6, H10.

Protection of Cultural, Creative, Noisy Uses and the Night Time Economy

- 2.22 The site is located within a Creative Enterprise Zone as defined by the Mayor of London within the London Plan. The specific premise and protection of creative sector growth opportunities and clusters is supported by policies E8 and HC5. Creative Enterprise Zones are defined as a Mayor of London initiative to establish clusters of creative production, which provide affordable premises and enterprise-related incentives for artists and creative businesses, pro-culture planning and housing policies, and offer career pathways and creative jobs for local communities and young people.
- 2.23 Policy HC5 of the London Plan (Supporting London's culture and creative industries) seeks to protect existing cultural venues, facilities and uses where appropriate. It is considered that the local warehouses generally, and Omega Works specifically as a prime example of warehouse living in the area, exists partially as a cultural venue. Omega Works facilitates numerous creative businesses and live/work spaces. Furthermore, the warehouse living model allows regular formal and informal social and cultural interactions which also include organised events and parties. By placing conventional housing directly adjacent to warehouse living, this would effectively stymie practical warehouse living.
- 2.24 Warehouse living is practically a noisy use and the cultural and social livelihood of the site would not be compatible with conventional housing which would not allow such a noisy use to continue directly adjacent. Warehouse living can often be subject to noise complaints from neighbours off-site, and so putting the uses on top of one another is irrational and contrary to policy HC5 as it would remove the practical continuation of the cultural and creative atmosphere of the warehouses.
- 2.25 The proposal would be contrary to policy HC5 (C1) as it would not develop, enhance, protect and manage new and existing creative workspace, providing flexibility for changing business needs, and an attractive business environment including related ancillary facilities. Existing creative workspaces would effectively be driven away and would not be given any rights to return, as all existing workspaces have not been properly accounted for in terms of their type of business or the rents they pay, nor the unique types of spaces that they require. Appropriate spaces would not be reprovided and start up costs would drive out such businesses.
- 2.26 In regard to policy HC5 (C2), the proposal would fail to support existing, or develop new, cultural venues within the Creative Enterprise Zone. Warehouse living is attractive for, and actively fosters cultural and social events which can be inherently noisy. This is the reason why they are located in a former industrial estate. Warehouse residents can readily provide a log of social and cultural events which take place on the site and in warehouses generally. This area is special partly because of its unique social and cultural ecology. By not supporting existing spaces and by not promoting new cultural venues, the proposal would tear the heart out of the essence of warehouse living at Omega Works and the wider locality.
- 2.27 In regard to policy HC5 (C3), the proposal has not demonstrated that it would effectively help deliver spaces that are suitable, attractive and affordable for the creative industries, taking into account the particular requirements of established and emerging creative businesses in the Creative Enterprise Zone. As previously mentioned, existing creative workspaces would effectively be driven away and would not be given any rights to return, as all existing workspaces have not been

properly accounted for in terms of their type of business or the rents they pay, nor the unique types of spaces that they require.

- 2.28 In regard to policy HC5 (C6), the proposal fails to support a mix of uses which derive mutual benefits from, and do not compromise, the creative industries and cultural facilities in the Creative Enterprise Zone in line with the Agent of Change principle. This goes to the heart of the planning policy failure of the proposal, as conventional housing dominating the site in adjacency to warehouse living would essentially destroy warehouse living and its complimentary creative industry of workspaces. Warehouse living is essentially a noisy use with its grassroots vibrancy of home life, home work, home social and cultural lifestyle.
- 2.29 Moving to the agent of change principle (policy D13), the principle places the responsibility of mitigating the impact of nuisances (including noise) from existing nuisance generating uses on proposed new development close by, thereby ensuring that residents and users of the new development are protected from nuisances, and existing uses are protected from nuisance complaints. Similarly, any new nuisance-generating development, for example a music venue, will need to put in place measures to mitigate noise impacts on existing development close by.
- 2.30 As warehouse living is effectively a noisy use by nature of its live/work essence with potentially noisy work and social and cultural events spaces and gatherings, it is an existing nuisance generating use which requires any noise sensitive use to take the burden of protecting itself. Therefore, any use which seeks to exist in conjunction with warehouse living must allow warehouse living to exist in exactly the same potentially noisy environment as it does so at present, allowing such noisy workspaces, flexible social and cultural environments which make the area special.
- 2.31 Policy D13 further states that development should be designed to ensure that established noise and other nuisance-generating uses remain viable and can continue or grow without unreasonable restrictions being placed on them. Conventional housing on its own and along with concierge guards and management service on-site constitutes unreasonable restrictions which make warehouse living unviable and unable to continue.
- 2.32 Part D3 of policy D13 is especially pertinent as it states how new noise-sensitive development (such as conventional housing) should be separated from existing noise-generating businesses and uses through distance, screening, internal layout, sound-proofing, insulation and other acoustic design measures. Conventional housing is incompatible with warehouse living within the same building and directly adjacent to one another, especially on a site which should be employment led and does not specifically call for housing apart from warehouse living.
- 2.33 Finally E of policy D13 states that boroughs should not normally permit development proposals that have not clearly demonstrated how noise and other nuisances will be mitigated and managed. In line with the above, the proposal should be refused as it would make existing noise-generating uses unviable and destroy warehouse living along with its informal cultural venues. For the reasons above, the proposal would also be contrary to policy D14 (Noise).
- 2.34 Further to the above, in regard to policy HC5 (C7), the proposal would fail to effectively contribute to the achievement of wider objectives for the business location such as the economic vitality and diversity of a town centre or the

intensification of an industrial area. The primary objectives of the Site Allocation and Regeneration Area are for employment led schemes – the proposal is residential led. Furthermore, the retention of warehouse living is the next objective of the Site Allocation and Regeneration Area, and the proposal jeopardises the notion of warehouse living. An employment led scheme would allow the objectives of the locality to be met and would not jeopardise warehouse living by its nature in comparison to conventional housing.

- 2.35 The proposal would be contrary to policy HC6 (supporting the night time economy) as it fails to protect and support the informal setup of evening and night-time cultural venues such as drinking and social events, warehouse party/ club night, music and other arts activities on the site and in surrounding warehouses. Within the Local Plan, the proposal would be contrary to policy SP15 (culture and leisure) which safeguards and fosters the borough's cultural heritage and promote cultural industries and activities through; supporting the provision of new work spaces and social and cultural venues in all areas of the borough that support all formal and informal cultural and leisure activities; protecting and enhancing, where feasible, existing cultural facilities and access to cultural heritage throughout the borough.

Protection of Queer Space

- 2.36 The Haringey Warehouse District generally and Omega Works specifically is considered to be a safe, queer space with a higher proportion of LGBTQ+ residents. People come to live in these spaces as they foster a culture of openness, safety, diversity, inclusiveness and support. By knocking down Omega Works without respect for its cultural value and identity to the wider LGBTQ+ community and replacing it with a sterile shell of warehouse living without any of its essence remaining, the proposed development would be discriminatory against a protected characteristic group.
- 2.37 An equalities impact assessment should be undertaken within the framework of the above in particular, as a matter of urgency. The proposal would be contrary to London Plan policies GG1 (building strong and inclusive communities), S1 (social infrastructure) and D5 (inclusive design), as it would not be designed taking into account London's diverse population as a mixed and balanced community, and it would not provide high quality people-focused spaces that are designed to facilitate social interaction and inclusion, in the unique ways that the existing warehouses do in relation to their flexible and open social and cultural settings. Just a few examples of the types of publicised events which happen locally are included below. More can be found by searching but some are advertised discreetly on social media and many more only by word of mouth. From taking a walk around the Warehouse District, the types of open and inclusive banners on warehouses also support the above. Residents can provide further background if necessary.

- <https://www.enfieldindependent.co.uk/news/12927495.haringey-festival-offers-a-chance-to-feel-safe-exploring-queer-identity/>
- [TICKLE: Kasra V & TSUNIMAN at Low Profile Studios, London . Tickets](#)
- <https://www.qxmagazine.com/2018/09/here-are-some-great-queer-events-happening-in-north-london-this-month/>
- <https://harringayonline.com/events/queer-short-film-night>

- <https://tickets.partyforthepeople.org/events/5229-mazzaz4chazzaz001-140forcorby>

3. Conclusions

- 3.1 The proposed development, due to lack of retention of practical warehouse living, inappropriate warehouse district masterplan failing to safeguard the future aims of the area, failure to maximise employment space or provide an employment-led scheme which goes against the aims of the site allocation, lack of affordable warehouse living provision, poor quality of warehouse living proposed, lack of affordable workspace, failure to support existing warehouse living residents and creative businesses which goes against the aims of the Creative Enterprise Zone, unacceptable quality of conventional residential accommodation, lack of conventional affordable housing, lack of protection for existing noise-generating uses (warehouse living, social, cultural and night-time spaces), lack of protection for social, cultural, and night-time spaces generally, lack of protection for LGBTQ+ spaces, would be unacceptable and should be refused. The Council should not be so desperate for development on these sites that they will accept something so woefully inadequate and questionable. Refusing this application would promote a future application which maintains the character of the community whilst also better promoting the aspirations of the borough.
- 3.2 For the reasons above, the proposal is wholly and unequivocally unacceptable and would whitewash, destroy and gentrify an existing unique, social, cultural, creative and economic community in London. This would then result in a domino effect of planning permissions swamping the entire Haringey Warehouse District and destruction of the unique character of the area over the next decade. Therefore, the entire Haringey Warehouse District should be consulted for the planning application so that all of the stakeholders of the area can have a say over its future. For an indication of what would be to come if this application was approved, see Figures 1 and 2 below.



Figure 1: Hackney Wicked festival in late 2010s

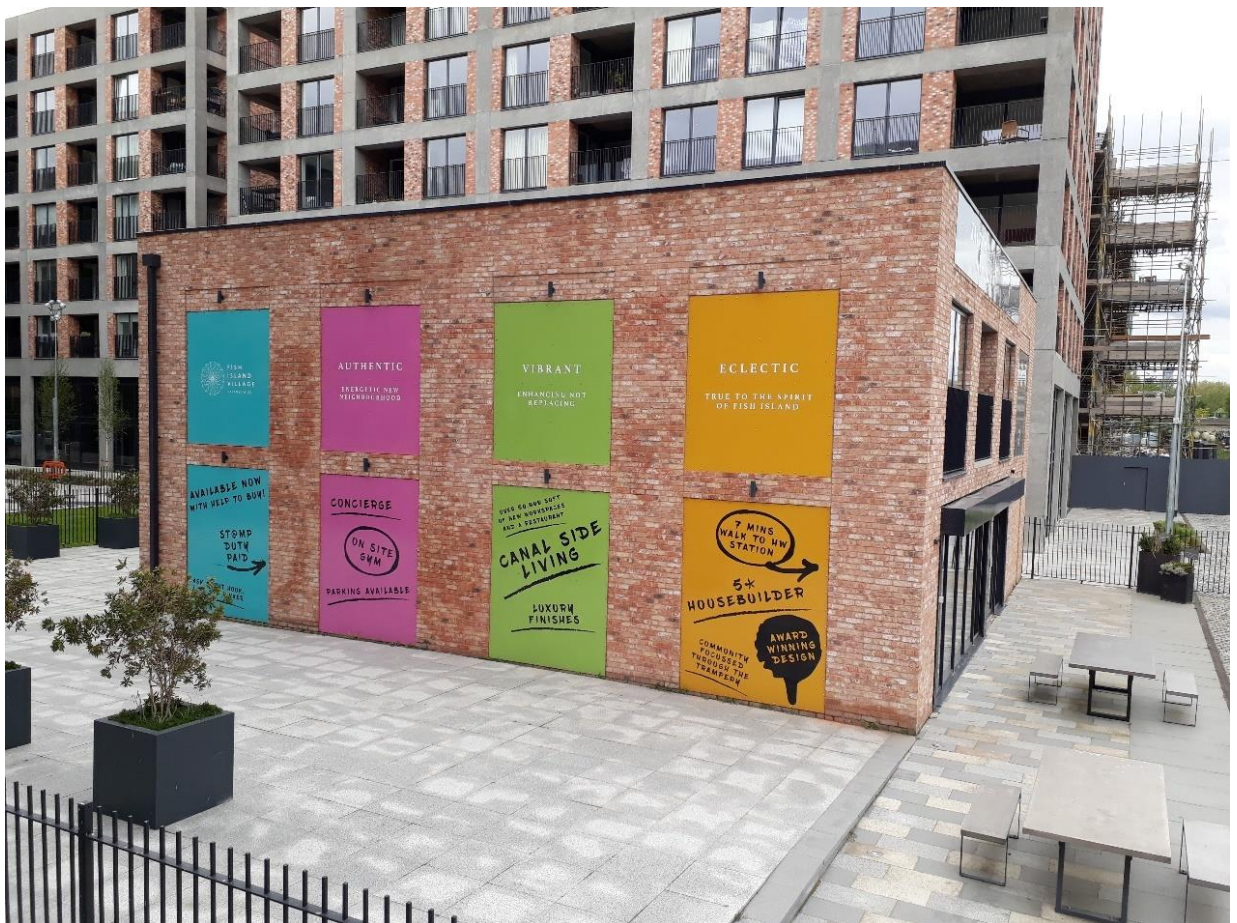


Figure 2: Hackney Wick in 2021

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