

Haringey Council
River Park House
London
N22 8HQ

Attention: Philip Elliott

Planning Application refs: HGY/2022/4310 & HGY/2023/0570

09 June 2023

Dear Haringey Council,

I write to strongly object to the two applications in respect of the proposed redevelopment of the Omega Works Warehouse on Hermitage Road, Haringey – and listed below.

The impact on the lives and livelihoods of existing occupants and residents of the Omega Works Warehouse District is of grave concern. This letter, however, focuses on impacts on existing surrounding communities and the substantial deficiencies in respect of the proposed scheme when assessed against adopted planning policies and material considerations. It also highlights the insufficiency of the submitted material supporting the planning applications – which is of particular concern given the substantial shift in scale represented by the proposals and the number of sensitive receptors surrounding the site.

I ask to be advised of any future re-consultation and whether the applications proceed to be considered by Planning Committee.

Regards,

Allison De Marco
B.Arch (Hons), MRTPI
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81 Highgrove Street,
Reading
RG1 5EJ

HGY/2022/4310

Application Type: Full planning permission

Address: Omega Works, Hermitage Road, Tottenham, London, N4 1LZ

Proposal: Redevelopment of the site for a mixed-use scheme comprising employment use (use Class E) and 36 residential units (use class C3). Together with associated landscaping, new courtyard, children's play space, cycle storage, new shared access route, 2x accessible car parking spaces and waste and refuse areas (Omega Works B)

Applicant: CPG Feldman Ltd

HGY/2023/0570

Application Type: Full planning permission

Address: Omega Works, Hermitage Road, Tottenham, London, N4 1LZ

Proposal: Redevelopment of the site for a mixed-use scheme comprising employment use (use Class E), 8 warehouse living units (sui-generis use class), and 76 residential units (use Class C3). Together with associated landscaping, cycle storage, accessible car parking spaces, children's play space, and waste & refuse areas. (Omega Works A)

Applicant: Majorlink Ltd

Objection Points

Consultation process: legibility and communication with existing communities

- The application submitted in respect of Omega Works A scheme (ref: HGY/2023/0570) was made valid on 27th March, but consultation letters were received by properties along Finsbury Park Avenue almost a month later – dated 18 April. This has reduced the community's opportunity to respond – and means the community were unaware of the application for the first 3 weeks, which is of concern.
- Queries and concerns are also raised in respect of the size of the consultation catchment. It is noted that residents living to the west of Omega Works A scheme (ref: HGY/2023/0570) were not consulted on, or made aware of, the Omega Works B scheme (ref: HGY/2022/4310). As noted below, there are concerns that the approach adopted by the applicants in submitting two separate schemes and Council (in supporting the submission of two schemes) means that the community may not be aware of the overall scale of the redevelopment proposed across the site.

Strategic - Lack of public benefits, including nil affordable housing.

- Based on the Housing Delivery Test Action Plan (2022), Haringey's Housing Delivery Test 2021 measurement is 75%. As the Council's 2021 measurement is at or above the Government's 75% threshold, in accordance with the NPPF, the Council is no longer subject to the 'Presumption in Favour of Sustainable Development' (PIFSD) arising from the Test. The Council can once again give maximum weight to its own Development Plan in planning decisions (as opposed to having to give a greater than usual amount of weight to the NPPF's PIFSD as a significant material consideration).
- The draft s106 Heads of Terms are substantially deficient. The lack of Affordable Housing offered requires robust scrutiny – and it does not appear that the offer in respect of Affordable Workspace is sufficient to justify the nil affordable housing offer.
- The submitted Financial Viability Statement prepared by CBRE indicates that the RLV falls below the BLV – and refers to an affordable housing PIL in coming to this conclusion. The draft s106 Heads of Terms do not clearly set out the inclusion of affordable housing PIL, which should be clarified. The 'notional s106 allowance' set out within the Financial Viability Statement appears substantially deficient.

Strategic – Incompatible residential use within the Designated Employment Area: Regeneration Area

- **Not employment – led site regeneration** - This site is located within an industrial estate with a mix of warehouse living and employment uses. It is designated as Designated Local Employment Area: Regeneration Area to reflect the mix of uses that already exist on it, and the Council's aspiration to retain a mix of uses on this site. As Site Allocation SA 32, it is specifically identified for the site potential development to increase accessibility providing increased employment floorspace, and provide warehouse living accommodation. It does **not** suggest introduction of new typical residential homes to the site (other than warehouse living with commercial elements).
- The Crusader Industrial Estate adjoining the site to the North is also part of Local Employment Area: Regeneration Area. As Site Allocation 31, it is allocated for redevelopment of the site to increase accessibility and create new commercial floorspace increasing the number of jobs and job density on the site. Again, the site allocation reinforces the aspiration to maintain commercial floorspace.
- To the south on the opposite site of Hermitage Road, there are mainly residential properties with Mavros House. Further to the south, part of the Vale Road/Tewkesbury Road estate is identified as partly as Locally Significant Industrial Site and partly as Designated Local Employment Area: Regeneration Area.
- In the Haringey Economic Development Strategy - Economic Baseline Final Evidence Report (2021), which forms part of the evidence base for the emerging new Local Plan identifies the strong need for additional employment floorspaces within this part of the borough. This echoes the currently proposed site allocation for employment-led regeneration.
 - *Falling supply of industrial land is putting pressure on space that remains, with 11% of employment floorspace lost in Haringey since 2011/12.*

- Continued demand for industrial space (and reduced supply) has seen rents increase by 60% in the last 4 years.
- The diversity of uses in Haringey's industrial estates is rapidly changing, with increasing demand for space from creative, artist and digital sectors. + Industrial estates with strong transport connectivity are generally those which are performing the strongest.
- The evidence suggests there are 21 workspaces across Haringey.
- Two thirds of these workspaces are creative & artists workspaces
- There is a strong concentration of workspaces around Seven Sisters and Tottenham Hale.
- Demand for workspace is strong, with rental values for commercial space all increasing rapidly over the last five years.
- As demonstrated from the table below, there are some key observations:
 1. Considering warehouse living with commercial elements as an integral part of the commercial uses, Omega Works A (ref: HGY/2023/0570) will not deliver any increase in overall employment related floor space. Omega Works B scheme (ref: HGY/2022/4310) will reduce the employment floorspace by 477m². Across both sites, the % of employment related floorspace to the total GIA has reduced by 66%.
 2. A significant proportion of total proposed GIA is purely for residential use (c3). In Omega Works A scheme (ref: HGY/2023/0570), 65% of the proposed GIA will be used for residential homes, representing an uplift of 61%. In Omega Works B scheme (ref: HGY/2022/4310), 81% of the proposed GIA will be used for residential homes but there are not any residential units on site.
 3. It is therefore considered the proposals of both sites are residential-led mixed use development, which are contrary to the employment-led regeneration envisioned in the site allocation SA31.

		Existing		Proposed		Change in GIA	Change in % of the total GIA
	Uses	GIA	% of the total GIA	GIA	% of the total GIA		
Omega Works A scheme (ref: HGY/2023/0570)							
Residential (use class C3).		145 m2	4 %	7,214 m2	65%	+ 7,069m2	+61%
	Employment related use:						
	Warehouse living with commercial elements (sui- generis use class)	3,230 m²	82%	2,759 m²	25%	-471m²	-57%
	Commercial (use Class E)	570 m²	14%	1,041 m²	10%	+ 471m²	-4%
	Sub-total – employment related	3,800 m²	96%	3,800 m2	35%	0 m²	-61%
Total GIA		3,945 m²	100%	11,014 m²	100%	+ 7,069m²	
Omega Works B scheme (ref: HGY/2022/4310)							
Residential (use class C3).		0 m²	0%	2,930 m²	81%	+ 2, 930m²	+81%
	Employment use:						
	Storage and distribution (use Class B8)	1,179 m²	100%	0 m²	0%	- 1,179 m²	-100%
	Commercial (use Class E)	0 m²	0%	702 m²	19%	+ 702 m²	+19%

	<i>Sub-total – employment related</i>	1,179 m ²	100%	702 m ²	19%	- 477 m ²	-81%
Total GIA		1179 m ²	100%	3,632m ²	100%	+ 2,453m ²	
Combined							
Residential (use class C3).		145 m ²	3%	10,144 m ²	69%	+ 9,999 m ²	+66%
	<i>Employment use:</i>						
	Warehouse living with commercial elements (sui-generis use class)	3,230 m ²	63%	2,759 m ²	19%	- 471m ²	-44%
	Storage and distribution (use Class B8)	1,179 m ²	23%	0 m ²	0%	-1,179 m ²	-23%
	Commercial (use Class E)	570 m ²	11%	1,743 m ²	12%	+1,173 m ²	+1%
	<i>Sub-total – employment related</i>	4,979 m ²	97%	4,502 m ²	31%	- 477 m ²	-66%
Total GIA		5,124 m ²	100%	14,646m ²	100%	9,522 m ³	

- Compromising the proposed employment uses within the site and surrounding industrial estate** - Part D of London Plan Policy E7 (2021) specifically mentioned that mixed-use or residential development proposals on non-designated Industrial Sites should only be supported where:
 - 1) the industrial and related activities on-site and in surrounding parts of the SIL, LSIS or Non-Designated Industrial Site are not compromised in terms of their continued efficient function, access, service arrangements and days/hours of operation noting that many businesses have 7-day/24-hour access and operational requirements
 - 2) the intensified industrial, storage and distribution uses are completed in advance of any residential component being occupied
 - 3) appropriate design mitigation is provided in any residential element to ensure compliance with 1 above with particular consideration given to:
 - a) safety and security
 - b) the layout, orientation, access, servicing and delivery arrangements of the uses in order to minimise conflict
 - c) design quality, public realm, visual impact and amenity for residents
 - d) agent of change principles
 - e) vibration and noise
 - f) air quality, including dust, odour and emissions and potential contamination.
 - Relationship with the on-site commercial uses - The warehouse living units will site below residential homes. These warehouse living units can generate noise during the night. The Noise Impact Assessment has not assessed the vertical transience of noise between floors. This should not mitigate by condition or building control process and should be assessed prior to determination of this application.
 - Relationship with Crusader Industrial Estate - It is noted that the Applicant appears to have engaged with Crusader Industrial Estate to develop a master planning and a new public green space separating the Omega Works and Crusader Sites may develop in Crusader Industrial Estate. However, this developer-led master plan holds no weight in the planning balance. It is not part of any adopted planning policy nor forms part of the application

site. There is no realistic timeframe for the redevelopment of the Crusader Industrial Estate. Hence, the applications should be assessed based on the existing situation.

- Block C of Omega Works A scheme (ref: HGY/2023/0570) and Block 2 of Omega Works B scheme (ref: HGY/2022/4310) will only be located 1m and 1.6-0m away from the Crusader Industrial Estate respectively where the service yards, car parks and the vehicular access route into the industrial estate are located. Given the 24-hour operation of the industrial estate, these areas are likely to be used by vehicles and lit 24/7. Primary windows to bedrooms and living rooms are proposed in the northern elevation of both proposed buildings. The proposed residential uses without sufficient landscape buffer from the shared boundary with Crusader Industrial Estate will likely to result in future complaints and create conflicts to the existing operation of Crusader Industrial Estate. The Environmental Health Officer should specifically confirm the current building relationship and uses are acceptable and they will not take any future actions against Crusader Industrial Estate.
 - **Relationship with Omega Works C** - The building of Omega Work C, which adjoins the site to the west) is not part of the application site. It relies on the existing shared service yard with Omega B for servicing. However, this existing shared servicing yard will change to a gated access route into the proposed courtyard. No information has been provided to demonstrate how the servicing arrangement of Omega Work C particularly the employment uses will be maintained.
- **Substandard quality of accommodation of the new homes:** The introduction of incompatible homes means substantial mitigation measures to air, noise and light pollution are needed to the new homes in accordance with the agent of change principles. This will result in substandard accommodation of the new accommodation. The concerns are set out further in the section below.

Strategic – lack of comprehensive approach

- The cumulative impacts of both schemes would have a detrimental impact on neighboring amenity. A comprehensive approach should be pursued which enables both schemes to come forward, while minimising neighboring amenity impacts.
- LB Haringey Council Officers should also satisfy themselves in respect of the cumulative impacts of the two schemes – and that the division of the site and scheme has not resulted in the overall scheme circumventing the thresholds for schemes referable to the Mayor of London under the Town and Country Planning (Mayor of London) Order 2008.

Sustainable development

- The National Planning Policy Framework (NPPF) sets out the Governments planning policies for England and how they are to be applied. The NPPF establishes a presumption in favour of sustainable development and seeks to establish a strong sense of place using streetscapes and buildings to create attractive and comfortable places to live, work and visit. The Applicants have failed to demonstrate that the two applications represent sustainable development – economically, socially or environmentally. Further objection points are set out below:

Planning Policy context – and application of London Plan Tall Building policy

- As LB Haringey Officers will know, London Plan Policy states that local Development Plans should define what is considered a tall building for specific localities.
- The emerging Haringey Draft Local Plan is still at an early stage – and some time from adoption. Haringey's Development Plan is currently made up of the Strategic Policies, Development Management Policies, Site Allocations and Tottenham Area Action Plan, alongside the London Plan and the North London Waste Plan. The council has started work on a new Local Plan, which is intended to run from 2024 to 2039.
- London Plan (2021) policy indicates that based on local context, Development Plans should define what is considered a tall building for specific localities, the height of which will vary between and within different parts of London but should not be less than 6 storeys or 18 metres measured from ground to the floor level of the uppermost storey.

- When considering local context, and the absence of any buildings of scale near the site, much of the scheme, including Block B of Omega Works A scheme (ref: HGY/2023/0570) are considered to comprise tall buildings. London Plan Policy D9 (Tall Buildings) therefore applies to the assessment of the scheme.

Loss of amenity and privacy – lack of transition in scale between the scheme and surrounding context

- The proposals represent a very substantial shift in scale – with the western elevation of Block B of Omega Works A scheme (ref: HGY/2023/0570) presenting as a sheer wall of development opposite the diminutive 2 storey homes to the west of the site – along Finsbury Park Avenue (See Image 1).
- London Plan (2021) adopted Policy (D9(C)(iii) Tall Buildings) indicates that: Development proposals should address the impact of the proposal from differing distances, including immediate views. London Plan policy highlights that ‘Where the edges of the site are adjacent to buildings of significantly lower height’ there should be an appropriate transition in scale between the tall building and its surrounding context to protect amenity or privacy.
- The proposal, specifically Block B of Omega Works A scheme (ref: HGY/2023/0570), is not considered to be in accordance with adopted Development Plan London Plan Policy D9 in this respect.
- There will be a substantial impact on the privacy of existing residents to the west, at Finsbury Park Avenue, and to the south-west, along Hermitage Road. This is a substantial impact – which has been inadequately addressed in the proposed scheme design and submitted material.
- There is no meaningful consideration in respect of mitigation – and the scheme design exacerbates privacy impacts, rather than resulting in a considered and sensitive response to site and context. It is of grave concern that circulation spaces and habitable room windows are orientated directly to the west – where they will result in an oppressive loss of privacy to existing residents to the west.
- The impact on neighboring properties, the proposed layouts and elevation of Block B should be reconsidered and submitted Design and Access Statement should be comprehensively amended to address this impact. Re-consultation should then be undertaken.



Image 1: West Elevation: Block B

Daylight and sunlight assessment

- The Daylight and Sunlight Assessment prepared by Herrington Consulting Limited is profoundly deficient. Given the substantial shift in scale presented by the proposal, and impact on neighboring properties, the document should be comprehensively amended, and re-consultation undertaken. Various deficiencies are evident in the document, including:

- **The room layout details used to assess most of the properties in Finsbury Park Avenue is not based on accurate data, but rather extrapolated.** The assessors should use actual floor plan details to confirm room layouts for the properties at 60 – 64, 68 – 72, 76 and 80 Finsbury Park Avenue.
- **The document high-level summary tables are misleading – as are the summary comments in the submitted DAS prepared by vPPR Architects.** The tables included in the main body of the report, including Table 6.1, indicate that many neighboring properties would continue to meet the BRE guidance. However, the full tabulated details included in Appendix A.3 fail to provide adequate assessment where rooms already experience low existing VSC, which would be reduced further by the proposed development. There is substantial case law in respect of the need to differentiate the impacts of proposed development, where they reduce available daylight within rooms already experiencing low daylight levels.
- The statement set out in the DAS that ‘the development will not result in a notable reduction in the amount of either daylight or sunlight enjoyed by the neighbouring buildings’ is misleading.

Fire safety

- **Single staircases** - Block B and C are relevant buildings under Planning Gateway 1. Both buildings are served by single staircases which constitute the only means of escape staircases and are the only fire service access staircases serving dwellings. The HSE comments had not been published during the original consultation window. The comments from HSE should be fully addressed before the determination of this application.
- As LB Haringey Council Officers will know, the National Fire Chiefs Council (NFCC) released a statement (on 14 December 2022) calling on the Government to make it a requirement for all new high-rise residential buildings over 18 metres or seven storeys have more than one staircase. LB Haringey Council Officers should satisfy themselves in respect of the impacts.
- **No provision of evacuation lift** - Policy D5(B5) (Inclusive Design) of London Plan (2021) requires all developments where lifts are installed, as a minimum at least one lift per core (or more subject to capacity assessments) should be a suitably sized fire evacuation lift suitable to be used to evacuate people who require level access from the building. Form 3 - Provision of evacuation lift (Policy D5(B5) has not been provided as required by the Draft Fire Safety London Plan Guidance (2022).
- Section 8.2 of the Fire Statement prepared by BB7 acknowledges the need but agreed that *‘following further research and discussions between the client and the approval authorities, it was agreed that only one lift will be provided per core to cater for both firefighting and evacuation purposes in cores serving levels above 18m.’* It is unclear who the approval authorities referred to are. This should be clarified. LFB should be consulted during the planning stage given the non-compliance with Policy D5 particularly as single staircases are relied on the means of escape. It is noted that London Fire Brigade is a statutory consultee in Building Regulations process. However, in this case, lack of evacuation lift affects the overall evacuation strategy and the overall layout. Hence, this needs to be fully resolved before determination of this application.
- **Professional qualification of the author** - Draft Fire Safety London Plan Guidance (2022) requires a Fire Statement to be written by a suitably qualified assessor that is: 1) registered with the Engineering Council as an Incorporated Engineer (IEng) or Chartered Engineer (CEng), **and** 2) registered with the Institution of Fire Engineers as a Member (MIFireE), Fellow (FIFireE) or Life Fellow (FIFireE(Life)) of the Institution. Based on the online directory of the Institution of Fire Engineers dated 28.04.2023, it appears that both the author and review of the Fire Statement are not registered with the Institution of Fire Engineers as a Member (MIFireE), Fellow (FIFireE) or Life Fellow (FIFireE(Life)). This should be clarified to ensure the Fire Statement is produced by a suitably qualified assessor in accordance with Policy D12 (B) of the London Plan (2021).

Impact on green embankment / Harringay Stadium Slopes Borough Grade II SINC

- The Preliminary Ecological Appraisal and Bat Building Survey prepared by Phlorum does not appear to have assessed the impacts on the green embankment / Harringay Stadium Slopes Borough Grade II SINC to the west of the site during construction and operation such as due to increase in lighting. LB Haringey Council Officers should satisfy themselves in respect of the impacts on SINC before determination of this application. Natural England’s comments only relate to designated sites

Impact on Tree G1

- The Tree Survey, Arboricultural Impact Assessment & Method Statement prepared by Indigo (p.13) identifies Tree G1 adjacent to western boundary of the Site within Harringay Stadium Slopes Borough Grade II SINC as Category C tree. This tree has a height of 15-20m. The justification of the suggested categorisation is unclear. This needs to be clarified.
- The Tree Survey Table (p.13) estimates RPA of Tree G1 is 6m. However, the Tree Protection Plan (231018/A1/TPP/01 A2) show a combined RPA of G1 and C2. This masks the actual extent of the RPA of Tree G1 alone. Hence, it is not clear the actual proportion of the RPA of Tree G1 will be encroached by the proposed Block B. The impact of proposed Block B on this tree would be materially different from the existing single and two storey buildings. Tree Officer should be consulted to ensure no adverse impact on the longevity and health of the tree.

Failure to meet the Urban Green Factor target

- The proposed development is predominately residential as mentioned in the section above. It will fail to meet the required Urban Greening Factor target of 0.4. The achieved UGF of 0.3 is substantially lower than the target. This should not be accepted nor dealt with by condition. The proposed development is therefore contrary to Policy G5 of London Plan (2021)

Microclimate Assessment prepared by Love Design Studios

- Off-site impacts have been identified – with a lack of clarity in respect of potential mitigation. Given the substantial shift in scale presented by the proposal, and impact on neighboring properties, the document should be comprehensively amended, and re-consultation undertaken.
- Methodology: CFD Analysis has been carried out. However, this is queried as this is not best practice for a scheme of this proposed scale – and where such a substantial shift in scale, and substantial sensitive receptors are located adjoining the site.

Playspace

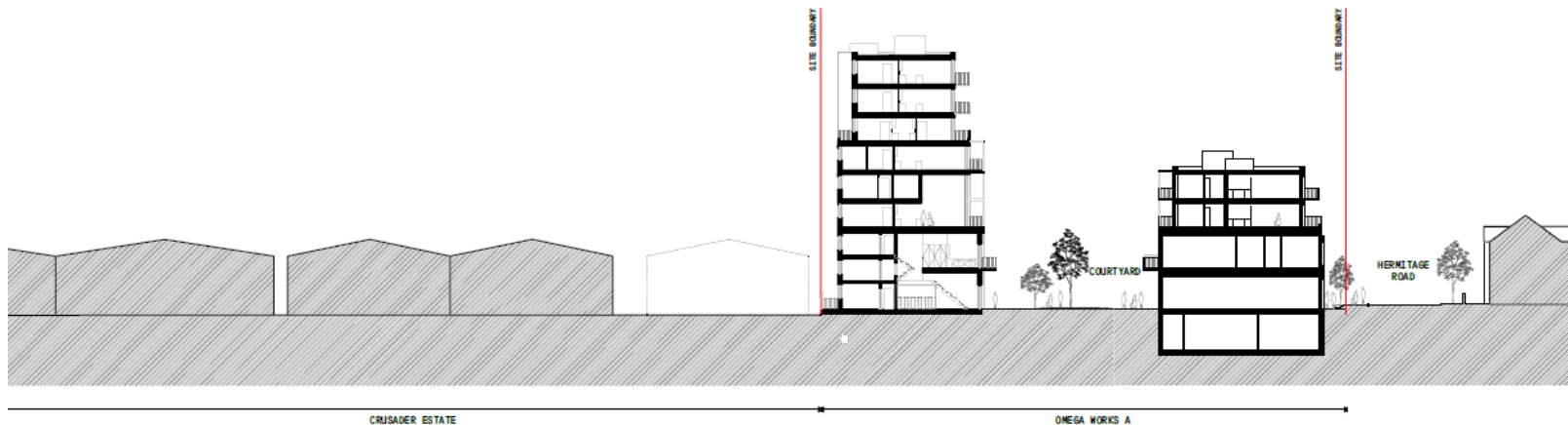
- Based on the Planning Statement prepared by the Collective Planning, the proposed play area between Buildings B and C (79m²) in Omega Works A scheme (ref: HGY/2023/0570) are dedicated for 0 – 5-year-olds with bonded safety surface and play equipment. However, it is likely to be within the servicing areas of Block B. This poses a health and safety risk to the young children.
- The dedicated play area on the terrace of Block C is proposed for 5 – 11-year-olds (121m²) in all new homes Omega Works A scheme (ref: HGY/2023/0570). In practice, access to this rooftop play area needs to go through the core within Block C. This is no bridge / podium link between Block A, B and C. Hence, it is highly unlikely that children from other blocks will use this rooftop playspace. This playspace is not considered accessible to all children in the Omega Works A scheme (ref: HGY/2023/0570).
- The proposed development therefore fails to provide adequate and accessible playspace for the future residents, contrary to London Plan Policy S4.



Figure 1.2: 3D Model image of existing Omega A (Sage) and Omega B (green) sites



Figure 1.3: 3D Model image of Omega A (blue) and Omega B (purple) development proposals



1 PROPOSED CONTEXT SECTION AA
SCALE: 1:250

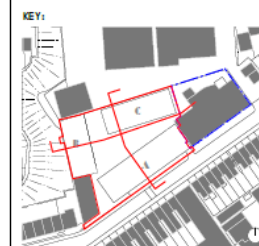


2 PROPOSED CONTEXT SECTION BB
SCALE: 1:250

REVISIONS:		
NO.	DATE	DESCRIPTION
P1	11/11/22	PLANNING ISSUE
		BY HW

NOTES:
— SITE BOUNDARY

0 5.0 10.0 15.0 20.0 M



VPPR ARCHITECTS

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LONDON N15 3LG WWW.VPPR.CO.UK

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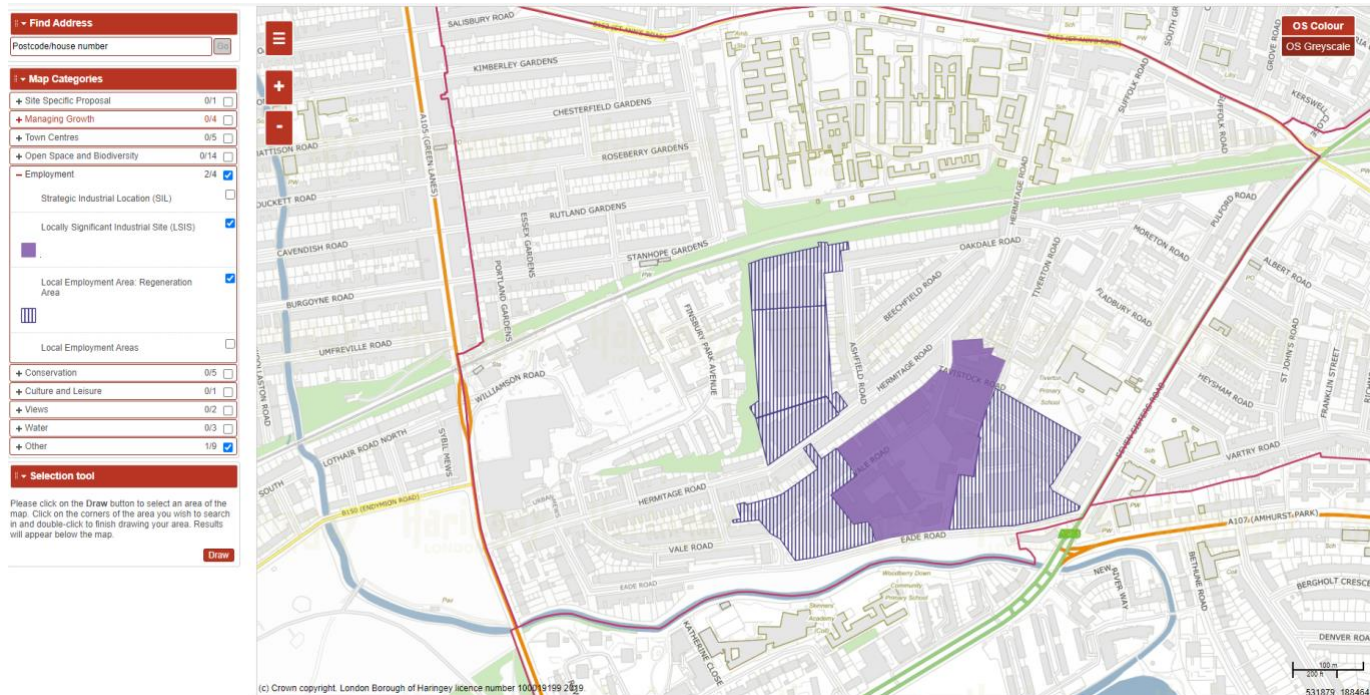
PROJECT:
OMEGA WORKS, 167 HERMITAGE ROAD
HARINGEY, LONDON N4 1NA
DRAWING TITLE:
PROPOSED CONTEXT
SECTIONS AA AND BB

DESIGN STAGE — 03
DRAWN — DC
CHECKED — JR
DATE — 27 JAN 2021
SCALE — 1:250/AA1 / 1:500/BB3

DRAWING NUMBER: REVISION: 1

43%





SA31: CRUSADER INDUSTRIAL ESTATE



Site Allocation

Proposed Site Allocation

2.92 Potential redevelopment of the site to increase accessibility and create new commercial floorspace increasing the number of jobs and job density on the site.

Commentary

2.93 A new street layout that improves accessibility through the site will be considered on this site.

Address	Crusader Industrial Estate, Hermitage Rd, Harringay N4		
Site Size (Ha)	1.57	PTAL Rating	1b
Timeframe for delivery	2011-2015	2015-2020	2020 onwards
Current/Previous use	Industrial		
Ownership	Private freehold		
How site was identified	Existing Designated Employment Area		
Planning designations	Locally significant industrial site: Crusader Industrial Estate Local employment area: Crusader Industrial Estate Adjacent to SINC borough grade II: Harringay Stadium Slopes		
Indicative Development Capacity	Net residential units	Employment m ²	
	not identified	not identified	

Site Requirements

- None of the buildings need to be retained, although business relocation (either on or off-site) should be considered as necessary before redevelopment can proceed.
- Any development will be required to be masterplanned in such a way to consider the adjacent Arena and Omega sites.
- Employment-generating uses will be the primary use on the site. The quantum of employment floor space and number of jobs will increase through any application on this site.
- The site will be given a Designated Employment Area: Regeneration Area status to reflect the mix of uses that already exist on it, and the Council's aspiration to continue change in this area.
- If necessary cross subsidy of employment floorspace from residential will be considered. If this is necessary, the employment uses will be conditioned to control operational hours and noise pollution.
- Redevelopment will enable the connection of the green grid network between Arena and Omega Industrial Estates.
- This site falls within a Regeneration Area, and as such employment-led mixed use development will be appropriate here.
- This site is subject to the requirements of Policy DM38- Employment-Led Regeneration.
- The principles of Policy DM39 apply to the site.

Development Guidelines

- The height of development needs to be cognisant of the terraced housing on Ashfield Road to the east, and Finsbury Park Ave to the west. Noting there is a significant slope up to these buildings, a reduction in height at the western side of the site to preserve the amenity of properties on Ashfield Rd is appropriate.
- Boundary walls matching those on the Arena Industrial site, and potentially Omega Works site should create a unified public realm.
- The new public realm should be active, with business premises fronting onto it. A café ancillary to the employment use may be suitable here.
- The pedestrian route through to Ashfield Rd should be maintained.
- Development at the southern edge of the site should be comfortable having an industrial neighbour.
- Development should positively contribute to the SINC running to the west of the site, linking the Gospel Oak-Barking rail line ecological corridor, through a new green chain, linking the 'slopes' behind Finsbury Park Avenue towards Finsbury Park.
- A public realm needs to be created through any redevelopment that provides excellent amenity to help draw local businesses to the site.
- The Council will be supportive of initiatives such as the Opportunity Investment Fund being used to encourage economic growth in this area.

- Thames Water should be consulted with regards the capacity of existing drains to move waste water from the site. Provision for safe and secure waste water drainage will be required to be identified prior to development commencing, and this will be a condition on planning consents.
- This site is identified as being in an area with potential for being part of a decentralised energy network. Proposals should reference the Council's latest decentralised energy masterplan regarding how to connect, and the site's potential role in delivering a network within the local area.
- Studies should be undertaken to understand what potential contamination there is on this site prior to any development taking place.
- A piling statement will be required prior to any piling taking place.
- Applicants must consult with Thames Water regarding both wastewater and water supply capacity upon the preparation of a planning application
- This site is in a groundwater Source Protection Zone and therefore any development should consider this receptor in any studies undertaken. Studies should be undertaken to understand what potential contamination there is on this site prior to any development taking place and where appropriate, a risk management and remediation strategy.
- A flood risk assessment is required for any development. Council's Strategic Flood Risk Assessment further outlines when an assessment is required and what it should include.

SA32: OMEGA WORKS



Address	Omega Works, Hermitage Rd, Harringay N4		
Site Size (Ha)	0.56	PTAL Rating	2
Timeframe for delivery	2011-2015	2015-2020	2020 onwards
Current/Previous use	Industrial premises, with significant residential occupancy		
Ownership	Multiple private freeholds		
How site was identified	Live/work enforcement investigation		
Planning designations	Adjacent to SINC borough grade II: Harringay Stadium Slopes		
Indicative Development Capacity	Net residential units	Employment m ²	
	not identified	not identified	

Proposed Site Allocation

- 2.94 Potential development to increase accessibility providing increased employment floorspace, and provide warehouse living accommodation.

Commentary

- 2.95 This site is identified as having a number units which have fallen into use as warehouse living. Some of these units, despite their lawful use provide poor standards of accommodation and have compromised/limited amenities which fall short of standards for residents envisaged by the Plan. A comprehensive approach to site management and managed enhancement of the employment and residential offer, including improved permeability are encouraged in line with Policy DM39.

- 2.96 The Council will work with landowners and residents to find ways to reintroduce employment into these areas, while continuing to meet the accommodation needs of the existing creative community. A new street layout that improves accessibility through the site will be considered on this site.

Site Requirements

- A site-wide management plan masterplan will be required as part of any planning application in accordance with Policy DM39 and having regard to site circumstances.
- The site will be given a Designated Employment Area: Regeneration Area status to reflect the mix of uses that already exist on it, and the Council's aspiration to retain a mix of uses on this site.
- The development should demonstrate that the maximum quantum of employment floorspace has been provided subject to viability which must be assessed looking at the mix of uses and the scheme as a whole.
- A potential future pedestrian & cycling connection to the north through the centre of the site should be included in any proposed design.
- The principles of Policy DM39 apply to the site.
- Affordable rent may be sought having regard to the viability of the scheme as a whole will be expected in this area in line with the Policy DM38.
- This site falls within a Regeneration Area, and as such employment-led mixed use development will be appropriate here.
- This site is subject to the requirements of Policy DM38- Employment-Led Regeneration.

Development Guidelines

- Height on the Hermitage Road frontage should be limited to respect the amenity of the residences opposite.
- Buildings in this area should continue to be designed to maintain the unique warehouse character of the area.
- Subject to viability, the central façade on Hermitage Rd should be retained, creating an entrance to a courtyard. No other buildings are required to be retained. This should be linked through to the new pedestrian access to Finsbury Park Avenue.
- Development should positively contribute to the SINC running to the west of the site, linking the Gospel Oak-Barking rail line ecological corridor, through a new ecological corridor linking the 'slopes' behind Finsbury Park Avenue towards Finsbury Park.
- Thames Water should be consulted with regards the capacity of existing drains to move waste water from the site. Provision for safe and secure waste water drainage will be required to be identified prior to development commencing, and this will be a condition on planning consents.
- A pedestrian link to Finsbury Park Avenue should be considered as part of any future redevelopment. A planning contribution may be required, and this should be included in any future design for the site.
- Studies should be undertaken to understand what potential contamination there is on this site prior to any development taking place.
- A piling statement will be required prior to any piling taking place.
- Applicants must consult with Thames Water regarding both wastewater and water supply capacity upon the preparation of a planning application.
- This site is in a groundwater Source Protection Zone and therefore any development should consider this receptor in any studies undertaken. Studies should be undertaken to understand what potential contamination there is on this site prior to any development taking place and where appropriate, a risk management and remediation strategy.
- This site is identified as being in an area with potential for being part of a decentralised energy network. Proposals should reference the Council's latest decentralised energy masterplan regarding how to connect, and the site's potential role in delivering a network within the local area.

Haringey's Industrial Sites

Declining industrial floorspace within the borough...

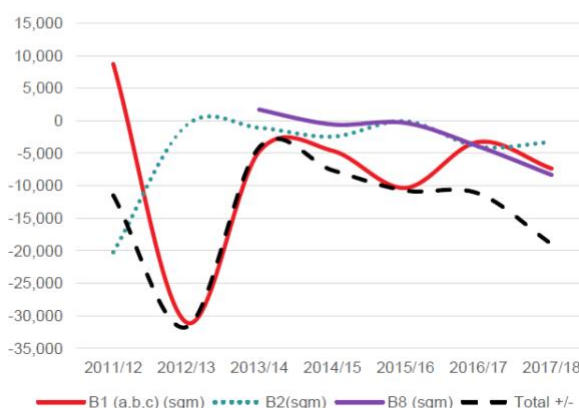
Floorspace available for employment uses has declined in Haringey over the last five years, putting increased pressure on employment floorspace that has remained. Beyond some minor positive changes (B1 floorspace in 2011/12 and B8 floorspace in 2013/14), floorspace across all types has declined every year.

Total employment floorspace has fallen by 95,805 sqm between 2011/12-2017/18. Looking at the types of employment floorspace, B1 employment floorspace accounts for over half of this total negative change, with B2 making up a third of this loss in employment floorspace. For reference, data from VOA shows there being 800,300sqm of employment floorspace in Haringey (B1, B2 & B8), meaning around 11% of employment floorspace has been lost since 2011/12.

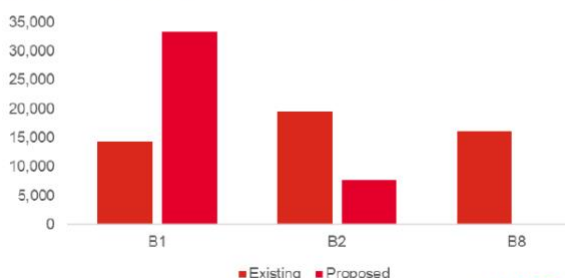
Challenges around industrial land are prevalent across London. Since 2010, industrial land in the capital has fallen by an annual rate of around 106 ha per annum. Restrictions in the availability of employment floorspace, particularly industrial floorspace supply have caused prices to increase well ahead of national benchmarks.

Looking forward, it is expected that B2 and B8 space is expected to decline further in Haringey. The London Development Database (which tracks planning consents where more than 1,000m2 of employment floorspace is being changed) shows that the amount of B2 and B8 space is expected to decline by 11,900sqm and 16,100sqm respectively based on currently consented schemes.

Changes in Employment Floorspace, 2011/12-2017/18



Projected Change in Employment Floorspace (sqm) in Haringey for Consented Schemes



Source: Authority Monitoring Reports, Haringey council, 2011/12 – 2017/18; London Industrial Land Demand, CAG Consultants, 2017; London Development Database, 2018

Workspaces are concentrated to the south-east of the borough, matching areas which have experienced strong business growth in recent years...

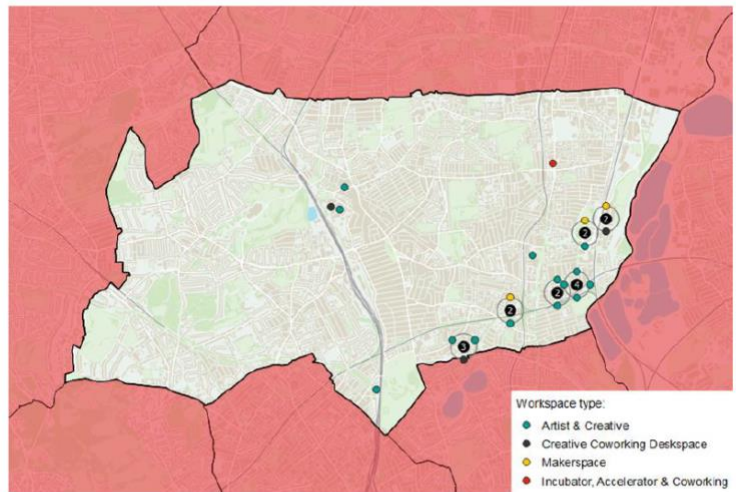
The map demonstrates the spatial distribution of workspaces. Supply is concentrated in the South East of Haringey, particularly around the Seven Sisters and Tottenham Hale areas, which are those areas in closest proximity to the Victoria Line and Hackney.

Workspaces in the South-East of the borough typically cater for more creative and maker activities.

Given the current concentration of workspace in the South-East of the borough and them catering towards creative and maker activities, opportunities to improve the provision of workspace across the rest of the borough should be supported. This should particularly be the case when schemes are brought forward in town centres or other employment areas, in close proximity to transport infrastructure.

In providing more workspaces across the borough, Haringey can better support its high proportion of self-employed professional workers, many of whom would benefit from flexible and affordable workspaces.

Location of Workspaces in Haringey, 2019



Source: GLA Infrastructure Map and Open Workspaces Map, 2019