

Appendix 2.4 – Comments on the Employment and the Economy section (DM46-55) of the Local Plan: Development Management Policies Regulation 18 consultation Feb-Mar 2015

General Comments on the Employment and the Economy section

Respondent ID	Comment ID	Respondent	Topic	Summary of Response	Council Response
661	DM421	Tottenham Business Group	Deallocation of employment land	The Employment Land Study was not revisited until 2015. Therefore the reallocation of the land had already been decided and key land decisions taken which are not supported by the evidence	The Employment Land Study forms part of the Council's evidence base and has informed the preparation of the emerging Local Plan documents. Proposed site allocations and land use designations have been informed by the full suite of technical evidence.
667	DM422	Turnaround Publisher Services	Medium-sized firms	<p>As a successful international sales and distribution service, we feel strongly that sustainable growth is most likely to be achieved by building on and extending local success stories, including SME's. Sadly, it has been extraordinarily difficult to engage Haringey in discussions about our business, even though we are one of the larger private sector employers in the Borough, with a number of professional staff on managerial salaries, paying decent wages to all our 60 employees. At present, we would characterise Haringey as a difficult place to do business. Council members and officers are not presently pursuing realistic employment policies. There is a poor understanding of the role and needs of local medium sized private sector companies. We may decide leave the Borough and locate our employment opportunities elsewhere – and it feels as though the Council probably wouldn't notice.</p> <p>It is foreseeable that scarce public sector resources will be assigned to an implicit priority of attracting new employers to the area to meet targets. Council members and officers have ventured out on international expeditions with a view to attracting new business interests to the Borough.</p> <p>We are delighted that for example, the N17 Design Studio is collaborating with the College of Haringey, Enfield and North East London in a 12-month pilot project to give local students the chance to learn key skills with globally recognised architects John McAslan. This high profile initiative has required considerable public investment to provide local work placements. Nothing wrong with that – but this is simply a training initiative; and the number of permanent and sustainable jobs likely to be created is at present unclear – not many, one suspects</p>	The Council recognises the important role that local businesses have in providing jobs and supporting Haringey's economy. The Local Plan policies seek to meet the needs of different economic sectors, including SMEs. The Council's evidence base indicates that SMEs play a key role in the local economy. The Local Plan policies, having been informed by this evidence, seek to support SMEs and other sectors by ensuring there is a sufficient stock of employment land and business premises to accommodate them.
818	DM423	Our Tottenham	Vision	Chapter 5 provides no sense of vision for the Haringey economy and its different places and aspects and strengths.	The Council's vision and spatial strategy for Haringey is set out in the adopted Strategic Policies Local Plan. The DM Policies document sets out further detailed policies to assist in the delivery of the spatial strategy.
818	DM424	Our Tottenham	Employment land	Paragraph 5.3 seems to accept that employment land will be sacrificed for the Council's housing and regeneration ambitions. This is unacceptable and unsound in planning terms, as well as in direct contradiction with many of the Council's and the GLA's own planning policies.	Disagree. The paragraph reflects that a balance must be struck in managing competing land uses within the borough. The Local Plan seeks to safeguard both designated and non-allocated employment sites to meet identified need and deliver Haringey's jobs target. There is a presumption against loss of employment land however the Local Plan provides some flexibility to ensure employment development is viable. The DM Policies set out further criteria in this regard. The Council considers that its suite of employment policies is in general conformity with the London Plan on consistent with the NPPF.

Comments on DM48 of the Local Plan: Development Management Policies Regulation 18 consultation Feb-Mar 2015

Respondent ID	Comment ID	Respondent	Topic	Summary of Response	Council Response
400	DM425	Ms J Hancher	Objection to protection of non-allocated employment sites	Given the acknowledged overprovision of employment land throughout London and within Haringey, object to the policy to seek to retain, in employment use, any non-designated employment sites and floorspace, if not identified in policy DM48A.	Local evidence has identified a future need for additional employment floorspace, therefore the presumption that any change from employment to other uses should be carefully managed. The release of non-designated employment land will be monitored and managed to ensure a sufficient stock is retained in the borough.
410	DM426	North London Waste Authority	Safeguarding Employment Land	NLWA supports the Council's proposals to safeguard land for employment uses and welcomes clarification added of the types of uses that are 'broadly acceptable' for employment land and regeneration areas by reference to the Local Plan: Strategic Policies. However, NLWA wishes to emphasise the importance of sui generis uses which are equivalent to B class uses and recommend that these are given explicit support within employment areas. Many waste operations can operate within enclosed buildings in a way which presents no greater or different risk of impacts than conventional B1c or B2 uses.	Some sui generis uses are recognised as being acceptable within designated employment areas, but will be considered on a case-by-case basis. The Local Plan provides sufficient flexibility to consider proposals for sui generis uses.
430	DM427	Derek Horne & Associates for Majorlink Ltd	Employment land	Given the acknowledged overprovision of employment land throughout London and within LB Haringey we object to policy to retain in employment use and non-designated employment sites and floor space if not identified in policy DM 48 A.	Local evidence has identified a future need for additional employment floorspace, therefore the presumption that any change from employment to other uses should be carefully managed. The release of non-designated employment land will be monitored and managed to ensure a sufficient stock is retained in the borough.
564	DM428	Savills on behalf of Archway Apartments	Marketing period	<p>We would note that these policies should ensure consistency with paragraph 22 of the NPPF, which seeks to avoid the long term protection of sites for employment use where there is no reasonable prospect of a site being used for that purpose. Similarly, paragraph 5.1.4 of the LBH Local Plan states that the Council will take a more flexible approach where local employment areas are no longer suitable for industrial or other employment generating uses, and a progressive release of surplus industrial land will be carried out, in order to facilitate urban regeneration. We therefore consider that emerging Policy DM48 should be revised to acknowledge that site specific circumstances and the viability of retaining land for employment uses should be reviewed when considering whether land should be retained for employment uses.</p> <p>In particular, we consider that the requirements of Policy DM52(b) are unduly onerous and should be revised to reduce the minimum marketing period. The requirement to undertake marketing for a continuous period of three years will significantly delay the delivery of redevelopment within the borough on sites which are demonstrably no longer suitable for employment uses. As such, it will also delay the delivery of regeneration benefits, including the provision of affordable housing, that could be provided on these sites.</p> <p>We also consider that emerging Policies DM49 and DM52 do not offer sufficient recognition to the employment benefits of uses which do not fall within Class B uses. Employment opportunities can be provided through a wide mix of non-residential uses, other than Class B uses, and retail, leisure, and community uses can also provide significant employment benefits, in addition to promoting economic activity. We consider that these uses should be encouraged within the borough and</p>	<p>Flexibility regarding the development for non-employment generating uses on non-designated employment sites is set out in draft policy DM52. The Council considers that the principle of safeguarding employment uses on non-designated employment sites is sound, particularly given the relative land values of employment and residential uses in the borough. Where developments on non-designated employment sites are able to help meet the Council's regeneration objectives and spatial vision for the borough, they will be considered on a site-by-site basis, applying the principles set out in draft Policy DM52. The release of non-designated employment land will be monitored and managed to ensure a sufficient stock is retained in the borough.</p> <p>Action: Delete DM48 part B but retain policy to manage uses on non-designated employment sites.</p> <p>The tests set out in current policy EMP4 with regards marketing are similar to those included in DM52. The Council considers the vacancy and marketing requirement for both designated and non-designated sites to be appropriate and in line with industrial land release criteria set out in the Mayor's Land for Industry and Transport Supplementary Planning Guidance.</p>

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				their ability to deliver employment opportunities should be acknowledged within the emerging policy.	
584	DM429	Rapleys on behalf of Lasalle Investment Management, long leaseholders	Duplication	We consider that this policy is a duplication of Policy SP8, and is unnecessary to be repeated in the Development Management Policies document.	Agreed. This duplication (part A of the policy) will be removed. Part B is not considered to be duplication however. Action: Remove DM48 part A.
628	DM430	DP9 on behalf of Tottenham Hotspur Football Club	Objection	The current policy has the effect of affording the same degree of protection to non-designated employment floorspace as designated employment floorspace. At present EMP4 provides a reasonable exemption, Suggested wording : B. Outside of these areas, the Council will seek to retain in employment use any non-designated employment floorspace and sites and planning permission will only be granted to redevelop or change the use of non-designated employment land and floorspace provided: a) the land or building is no longer suitable for business or industry use on environmental, amenity and transport grounds in the short, medium and long term; and b) there is well documented evidence of an unsuccessful marketing/ advertisement campaign, including price sought over a period of normally 18 months in areas outside the DEAs, or 3 years within a DEA; or c) the redevelopment or re-sue of all employment generating land and premises would retain or increase the number of jobs permanently provided on the site, and results in wider regeneration benefits.	The tests set out in current policy EMP4 with regards marketing are similar to those included in DM52. The Council considers the vacancy and marketing requirement for sites to be appropriate and in line with industrial land release criteria set out in the Mayor's Land for Industry and Transport Supplementary Planning Guidance.
659	DM431	Haringey Federation of Residents Associations (HFRA)	Our Tottenham Charter	SUPPORT THE LOCAL ECONOMY: - Starting with the strengths and needs of Tottenham's residents, small businesses, social enterprises, cooperatives and community assets, putting sustainability, equality, local needs and community service at the heart of the local economy	Noted.
694	DM432	Iceniprojects on behalf of Berkeley Homes	NPPF consistency	This policy is unsound – it is not justified and is not consistent with national policy. The policy should be amended to give consideration to the individual circumstances of a site when deciding what protection should be offered to non-designated employment sites. Para 8.16 and 8.17 of Atkins Employment Land Study (2015) states (with emphasis added) " <i>Ensuring a supply of good quality, well located employment sites is maintained will help to support investment by existing and new businesses and growth in the local business base. Demand is likely to continue to be driven by small and medium sized businesses, primarily operating in B1 sectors. The trend-based forecasts suggest further decline in industrial and warehousing employment which is expected to result in some surplus employment land over the period to 2031. It is important that any surplus land is either re-used to meet B1a/b needs or released to other uses to</i>	Flexibility regarding the development for non- employment generating uses on non-designated employment sites is set out in draft policy DM52. The Council believes that the principle of safeguarding employment uses on no-designated employment sites is sound, particularly given the relative land values of employment and residential uses in the borough. Where developments on non-designated employment sites are able to help meet the Council's regeneration objectives and spatial vision for the borough, they will be considered on a site-by-site basis, using the principles set out in draft DM52. The release of non-designated employment land will be monitored and managed to ensure a sufficient stock is retained in the borough. Action: Delete DM48 part B but retain policy to manage uses on non-designated employment sites.

				<p><i>contribute to Haringey's housing and regeneration objectives. At the same time, it will be important that fit-for-purpose, well occupied B2 and B8 sites that serve the needs of local businesses are safeguarded so that Haringey maintains a diverse range of business activities and employment opportunities.</i></p> <p><i>"The NPPF requires local authorities to be responsive to market signals to ensure that there is adequate provision of the right type of employment land to meet the needs of the business community. At the same time, there is little benefit in safeguarding employment sites that are not fit-for-purpose and could be used to relieve the Borough's housing and regeneration pressures."</i></p> <p>The release of an employment site for an alternative use can lead to the regeneration of an area through the introduction of new investment. The potential for a sites release from employment use should also be considered in relation to site location and circumstances, and the quantum of employment space that is generally available in the borough.</p>	
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400	DM433	Ms J Hancher	Policy clarification, non-designated sites	This policy is unclear. It states that it related to designated sites and where employment uses are proposed. No objections are raised to the words chosen unless it is intended for the policy to relate to non-designated employment sites, in which case, objection is raised on basis of stated overprovision of employment land in London and Haringey.	Noted. This policy only applies to designated employment sites as specified. This will be clarified in the policy. Action: Clarify that the policy deals with enhancing dedicated employment designations.
400	DM434	Ms J Hancher	Design standards, affordability	The requirements to meet higher design standards is laudable; However, where it relates to existing buildings, such as obsolete industrial buildings, in respect of which it is intended to make internal rearrangements, such, as for example, to provide for live/work units, the quality of the internal accommodation should be left for the tenants. It is our experience that if required to refurbish such buildings to higher standards the accommodation might not be affordable.	This policy does not pertain to mixed use proposals involving a residential element. Relevant requirements are set out in the proposed Warehouse Living policy.
410	DM435	North London Waste Authority	Maximising Use of Employment Land	NLWA supports the policy but recommends that an amendment is included to recognise that the level of optimisation of land within designated employment sites that is achievable may vary depending upon the specific employment use. There may be particular reasons why a certain site is suitable for some less intensive employment use compared to more intensive employment uses. Bringing an unused site into employment use or returning a previously used site to employment use should take priority over the level of employment achievable. NLWA recommends that point 'b' of the policy is amended to add at the end of the sentence "However, when returning a previously uses site back into employment use or commencing and employment use on an unused site, the employment density may be lower than on existing will established employment sites which have been continuously use for employment."	Noted. The policy will be amended to recognise both increases in floorspace and job density. The policy supports bringing disused employment sites back into use. Action: Clarify policy to support intensification of employment both in terms of floorspace and job density.
410	DM436	North London Waste Authority	Maximising the Use of Employment Land	The requirement at 'c' to allow flexibility including subdivision and/or amalgamation may suit a building with several occupants, but may not be possible for a developer whose employment offering requires bespoke buildings, as may be the case with municipal waste	Noted. Action: Revise text 49.C to provide for greater flexibility.

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				management facilities.	
410	DM437	North London Waste Authority	Maximising the Use of Employment Land	The requirement at 'f' to improve and enhance the quality of the business area may need some further description or clarification so that the geographic extent of a developer's obligations are clear from the outset.	The policy sets out that all new employment development should make a positive contribution to its surroundings. Further details in this respect will be set out in the policy and supporting text. Action: Revise policy and/or supporting text to provide further clarification on how proposals should positively contribute to employment sites.
430	DM438	Derek Horne & Associates for Majorlink Ltd	Non-designated sites	Policy unclear. States it relates to designated sites <u>and</u> where employment uses are proposed. No objections are raised to the words chosen unless it is intended for the policy to relate to non-designated employment sites. If the policy is intended to relate to a non-designated employment sites then objection is raised on basis of stated overprovision of employment land in London and Haringey.	Noted. This policy only applies to designated employment sites. The policy will be amended to clarify this. Action: Clarify that the policy deals with enhancing dedicated employment designations.
430	DM439	Derek Horne & Associates for Majorlink Ltd	Design standards	Requirements of Council to meeting higher design standards is laudable. However, where it relates to existing buildings, such as obsolete industrial buildings built prior to WWII, in respect of which it is intended to make internal rearrangements, such as, e.g. to provide live/work units, the quality of the internal accommodation should be left to the tenants. It is our experience that if required to refurbish such buildings to higher standards the accommodation might not be affordable.	This policy does not pertain to mixed use proposals involving a residential element. Relevant requirements are set out in the proposed Warehouse Living policy.
584	DM440	Rapleys on behalf of Lasalle Investment Management, long leaseholders	Objection	Criteria A and A(b) require all new development within designated employment areas to achieve the maximum amount of employment floorspace reasonably possible on sites. This requirement is ambiguous and is difficult to demonstrate the "maximum" amount of employment floorspace that can be achieved on site. This requirement does not take account of the type of employment uses, the quality of employment floorspace and the number of jobs generated from them, and the relationship with other uses proposed within a mixed use development. We therefore object to this requirement as currently worded.	Noted. We will clarify this position as being supportive of applications which result in an increase in either floorspace or employment density on designated and dedicated employment sites (ie SIL, LSIS, and EL designations), having regard to the spatial strategy and the Council's other key plans and strategies. Action: Change scope of the policy to include SIL, LSIS, and EL only, and clarify policy to support intensification both in terms of floorspace and job density, having regard to the spatial strategy and the Council's other key plans and strategies.
584	DM441	Rapleys on behalf of Lasalle Investment Management, long leaseholders	Flexibility	Criterion A (B) seeks to ensure an adequate separation of uses, particularly where new residential floorspace is introduced as part of a mixed use scheme. Residential amenity can be protected by design and appropriate mitigation measures. Therefore, we consider that it is inappropriate to require an adequate "separation of uses," as it would compromise the development potential for allocated mixed use development sites, and it is not in line with the NPPF which requires Local Plan policies to be flexible.	Due to the change above, residential will not be a suitable use on these sites, as set out in SP8. Action: Remove reference to residential uses from this policy.
609	DM442	Apcar Smith Planning on behalf of Wedge Investments Ltd	Residential use	It is considered that Policy DM49 should be amended to enable mixed use development including residential on employment land and sites. This would be consistent with the encouragement for mixed use development in the NPPF and The London Plan. As it is acknowledged that the retention of jobs in the Borough are important it would be appropriate for the reference to mixed use development to include comment to the effect that the mixed use development should enable similar numbers of job opportunities on the site as that currently or last existing when the site was in operation. It is accepted that this should only be on sites within or on the edge of residential areas but this would, in any affect, be governed by the wording of Criterion (g) as it currently stands. It is considered that this would be consistent with your	For clarity, this policy will be amended to deal with dedicated employment designations only, with regeneration areas covering the locations in which mixed use development being provided in draft DM50. Action: Amend policy to clarify it pertains to with enhancing dedicated employment designations rather than regeneration areas.

				draft Policy DM50.	
667	DM443	Turnaround Publisher Services	Maintain local businesses	Maintaining viable existing employment in the Borough is a real world, low cost sustainable way of doing business, and should be a priority	Noted. This policy seeks to increase opportunities for this type of use. DM52 resists loss of existing employment stock.
667	DM444	Turnaround Publisher Services	Pro SMEs	A second Council priority should be understanding how and why local companies are achieving their success and situated in the Borough (in spite of the current lack of Council engagement), to encourage expansion and sustainable growth. We note that it is notoriously difficult for large public sector organisations to understand busy and expanding medium-sized private organisations. 'Liaising' with funded 'representatives' is not effective. Unlike the Council, the sector does not behave as a unified complex bureaucracy.	Noted. This is outside the scope of the Local Plan.
818	DM445	Our Tottenham	Employment land	Policy DM49 (and supporting paras) seeks to achieve the maximum amount of employment floorspace and employment densities through new development. This will inevitably lead to the delivery of office type workspace, rather than hybrid or industrial type workspace. This is a concern given the existing supply of and strong demand for industrial type workspaces, which should be protected. We propose this policy is amended so as to provide a more sensitive approach.	Noted. The policy will be revised to encourage increases in floorspace or job density. Action: Clarify policy to support intensification both in terms of floorspace and job density.
818	DM446	Our Tottenham	Conversion	We disagree with the suggestion that 'old stock' is not suitable to 'current need'. New activities often take place in older stock, because it provides suitable spaces and typologies for the work and is more affordable. Also, what is the meaning of 'regenerate employment land'?	The regeneration of employment land covers two key principles. Firstly, the Council recognises that it is important to continually improve the stock of employment land, so that it meets the needs of businesses. This policy addresses this issue on dedicated employment sites. Secondly, where regeneration is to be focused in growth areas, mixed use development will be preferred, when a cross subsidy from residential to fund new employment land in high density areas will be supported., This will be covered in DM51. Action: Clarify that this policy pertains to enhancing dedicated employment designations rather than regeneration areas more broadly.
818	DM447	Our Tottenham	Industrial land	This document should include policies relating to uses suitable for Haringey's industrial land, rather than making a loose and unspecific reference to the London Plan which will be difficult to find.	Strategic Policy SP8 sets out the range of acceptable uses on designated industrial land. The policy provides further criteria for managing development proposals, having regard to SP8.

Comments on DM50 of the Local Plan: Development Management Policies Regulation 18 consultation Feb-Mar 2015

Respondent ID	Comment ID	Respondent	Topic	Summary of Response	Council Response
400	DM448	Ms J Hancher	Objection to policy criteria, PTAL	Whilst supporting proposals for mixed use development, object to criteria a - e for following reasons: a. mixed use developments should not be restricted to sites with a PTAL 4 or higher where the site is already in employment use, since mixed use developments containing a mix of commercial and residential or live/work units are more sustainable than buildings within a single use and are more likely to reduce the need to commute between living and working.	Noted. It is important that a range of types of employment sites are provided for in the borough. This includes uses that are not compatible with residential, such as industrial, and heavy logistics uses. Thus certain sites will be protected for dedicated employment uses. However, it is recognised that the policy could be amended to allow for greater flexibility. Action: Remove location requirement for PTAL 4 or higher and clarify that Council will not support proposals for mixed use schemes where there is poor public transport accessibility.

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400	DM449	Ms J Hancher	Objection to policy criteria, sustainability, viability	Whilst supporting proposals for mixed use development, object to criteria a - e for following reasons: b. Irrespective of viability, mixed uses should be encouraged because they are more sustainable. In my experience, such uses are only proposed where they are more viable.	Noted. The policy requirement is considered necessary to deliver the spatial strategy.
400	DM450	Ms J Hancher	Objection to policy criteria, prohibiting development	Whilst supporting proposals for mixed use development, object to criteria a - e for following reasons: c. The requirement for no loss of employment floorspace, would preclude the conversion of existing obsolete commercial buildings to live/work and would, as a consequence, in some instances, if not all, fail to encourage new employment.	Noted. The policy will be revised to provide more flexibility for development proposals whilst seeking the maximum reasonable amount of floorspace. Action: Amend policy to provide more flexibility on loss of employment floorspace whilst ensuring proposals deliver the maximum reasonable amount of floorspace.
400	DM451	Ms J Hancher	Objection to policy criteria, capped commercial rents	Whilst supporting proposals for mixed use development, object to criteria a - e for following reasons: The Council implies in its employment policies that viability is an important criterion. If the Council seek to cap commercial rents, this will discourage investment in employment. This would be contrary to Council's objectives as set out in para 5.2. Live/work units provide affordable accommodation and that is why they are popular in Haringey.	The Council considers affordable workspace is necessary to support economic growth and provision will be required where viable.
400	DM452	Ms J Hancher	Objection to policy criteria, capped commercial rents	Whilst supporting proposals for mixed use development, object to criteria a - e for following reasons: e. Proposed mixed use development will be inhibited if the Council insists on limiting the increase in rental figures to below inflation, as proposed in para 5.19, since it may deter investment.	The Council considers affordable workspace is necessary to support economic growth and provision will be required where viable.
262	DM453	Safestore (Bilfinger GVA)	Affordable floorspace	The Council supports proposals for mixed-use redevelopment on sites where it is necessary to facilitate renewal and regeneration of existing employment land and floorspace. We support the principle of this policy but do not consider that point d. complies with the NPPF. The exact proportion of affordable space is not explicitly stated. It is suggested that a flexible approach is taken within the policy to the offer of affordable workspace, to ensure that its delivery is subject to viability in the same way affordable housing is. The NPPF (Para. 173) outlines that the sites and scale of development identified in the plan should not be subject to such a scale of obligations and policy burdens that their ability to be developed viably is threatened. It is considered that proposed Policy DM50 is not in accordance with the NPPF given that scheme viability is not taken into consideration	The Council considers affordable workspace is necessary to support economic growth and provision will be required where viable.
415	DM454	Transport for London	Regeneration	The principle of Policy DM50 is welcomed. Within the context of Crossrail 2 it will be important to provide the necessary flexibility so that currently safeguarded land can, where appropriate change as a result of changing economic circumstances. Notwithstanding this, further flexibility may be required if full benefits from Crossrail 2 are to be realised. For example, the re-provision of existing employment facilities allowing for alternative development which capitalises on Crossrail 2 benefits and supports wider regeneration objectives to take place.	Noted. The Council considers that this policy creates a suitable framework for regeneration around existing and future transport nodes.
430	DM455	Derek Horne & Associates for Majorlink Ltd	PTAL	Whilst supporting proposals for mixed use development we object to criteria a-e of the following reasons: a. Mixed use developments should not be restricted to sites with a PTAL of 4 or higher where the site is already in employment use, since mixed use developments containing a mixture of commercial and residential or live/work units are more sustainable than buildings within a single use and are more likely to reduce the need to commute between living and	Noted. It is important that a range of types of employment sites are provided for in the borough. This includes uses that are not compatible with residential, such as industrial and heavy logistics uses. Thus certain sites will be protected for dedicated employment uses. For mixed-use proposals in line with DM50, reference to PTAL levels will be removed to provide for sufficient flexibility in policy implementation, allowing proposals to be considered on a case basis having regard to individual site

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				working areas.	circumstances. The key principle of the policy will remain unchanged however, in that the Council will only support proposals for such mixed-use redevelopment on sites where there is good public transport accessibility. Action: Remove reference to PTAL in policy and supporting text, and clarify that Council will not support proposals for mixed use schemes where there is poor public transport accessibility.
430	DM456	Derek Horne & Associates for Majorlink Ltd	Mixed use	Whilst supporting proposals for mixed use development we object to criteria a-e of the following reasons: b. Irrespective of viability, mixed uses should be encouraged because they are more sustainable. In my experience uses are only proposed where they are more viable.	Noted. There is a strong correlation between accessibility and land values in London, and therefore the provision of only accepting mixed uses in more accessible locations is appropriate.
430	DM457	Derek Horne & Associates for Majorlink Ltd	Employment floorspace loss	Whilst supporting proposals for mixed use development we object to criteria a-e of the following reasons: c. This part of the policy, which requires there to be no loss of employment floor space, would preclude the conversion of existing obsolete commercial buildings to live/work and would, as a consequence, in some instances, if not at all, fail to encourage new employment.	Noted. The policy will be revised to provide more flexibility for development proposals whilst seeking the maximum reasonable amount of floorspace. Action: Amend policy to provide more flexibility on loss of employment floorspace whilst ensuring proposals deliver the maximum reasonable amount of floorspace.
430	DM458	Derek Horne & Associates for Majorlink Ltd	Cap commercial rents	Whilst supporting proposals for mixed use development we object to criteria a-e of the following reasons: d. The Council implies in employment policies that viability is an important criterion (e.g. DM50(e)). If the Council seek, as they have indicated in paragraph 5.19 and in draft SA document (p103), to cap commercial rents, this will surely discourage investment in employment. This would be contrary to council's objectives (set out in para 5.2 of this document). Live/work units provide affordable accommodation. Our experience is that live/work units provide affordable accommodation – that is why they are popular with LB Haringey.	The Council considers affordable workspace is necessary to support economic growth and provision will be required where viable.
430	DM459	Derek Horne & Associates for Majorlink Ltd	Rental figures	Whilst supporting proposals for mixed use development we object to criteria a-e of the following reasons: e. Proposed mixed use developments will be inhibited if the council insists on limiting the increase in rental figures to below inflation, as proposed in paragraph 5.19, since it may deter investment.	The Council considers affordable workspace is necessary to support economic growth and provision will be required where viable.
525	DM460	Barton Willmore on behalf of Workspace	NPPF compliance	LBH proposes mixed-use redevelopment on sites where it is necessary to facilitate renewal and regeneration of existing employment land and floor space. Workspace supports the principle of this policy but raises concern with the inclusion of 'Point D' which states that a proportion of employment floor space should be provided as affordable workspace. The exact proportion is not, however, stated. It is suggested that a 'flexible approach' is taken to the offer of affordable workspace, to ensure that its delivery is subject to viability in the same way affordable housing is. The NPPF (Para. 173) outlines that the sites and scale of development identified in the plan should not be subject to such a scale of obligations and policy burdens that their ability to be developed viably is threatened. Workspace therefore raises concern that the policy is not in accordance with the NPPF given that scheme viability is not taken into consideration. We also raise concern as to whether the end product would be enforceable,	The Council considers affordable workspace is necessary to support economic growth and provision will be required where viable.

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				and if so, by whom?	
584	DM461	Rapleys on behalf of Lasalle Investment Management, long leaseholders	Restrictive	Requiring maximum amount of employment floorspace is ambiguous and impractical.	The Council has completed workspace viability evidence which shows that there is potential for residential use to cross subsidise new workspace on sites in regeneration areas. The policy provides sufficient flexibility to make development viable, in line with the NPPF, by requiring developers to submit a viability assessment demonstrating the minimum amount of residential floorspace is proposed to enable development of employment floorspace. The Council will seek to maximise employment floorspace on this basis.
584	DM462	Rapleys on behalf of Lasalle Investment Management, long leaseholders	Against NPPG	<p>Seeking the provision of non-defined “affordable workspace” “in perpetuity” is a fundamental concern, as this requirement is too onerous for development proposals and will undermine the viability and deliverability of mixed use redevelopment schemes to the detriment of the Local Plan’s strategy and objectives. In terms of the use of planning conditions to keep the level of rental value increases below the level of inflation of commercial floorspace, there are a number of practical issues associated with the approach, as the market conditions and economic trends will change over time, and there is no practical mean to set the frequency of rental reviews. Fundamentally, the use of planning conditions to control the level of commercial rental value does not meet the tests of the use of planning conditions as set out in the NPPF and its practice guidance.</p> <p>There should be no requirement to provide a proportion of the employment floorspace as “affordable workspace” without providing the definition of affordable workspace or taking into account development viability. As no supporting justifications or evidence quoted as to what this proportion should be, we object to this policy criterion. It should be noted that both cost and size are the primary variables when considering the definition of “affordable workspace”</p> <p>we strongly object to paragraph 5.19 which states that “<i>the Council will expect that development which is enabled through a mixed use scheme contributes to the provision of affordable workspace in perpetuity</i>”, and that “<i>the Council will use planning conditions to ensure rental value increases are kept below the level of inflation on commercial floorspace</i>”</p>	The Council considers affordable workspace is necessary to support economic growth and provision will be required where viable.
629	DM463	DP9 on behalf of undisclosed	Flexibility	<p>As drafted the mixed use redevelopment of employment land can only take place where all of (a) to (e) have been met. The policy should provide greater flexibility to reflect wider regeneration outcomes.</p> <p>Proposed text: “A. The Council will support proposals for mixed-use redevelopment on sites where this is necessary to facilitate renewal and regeneration (including intensification) of existing employment land and floorspace. Such mixed use proposals will only be acceptable where they meet all of the following criteria, <u>unless it can be demonstrated that it will result in regeneration benefits supported by other development policies in accordance with Policy DM52(c):...</u>”</p>	It is considered that this policy manages regeneration of employment land from one employment use to another. DM52 manages transfer from employment land to an entirely separate use. As such it is considered that the two policies should not reference one another.
629	DM464	DP9 on behalf of undisclosed	High PTAL mixed use	<p>PTAL 4 should be changed to PTAL 3, particularly for mixed use sites, with in residential neighbourhoods. Proposed change:</p> <p>“...high levels of public transport accessibility <u>or within established</u></p>	Noted. Reference to PTAL levels will be removed to provide for sufficient flexibility in policy implementation, allowing proposals to be considered on a case basis having regard to individual site circumstances. The key principle of the policy will remain unchanged however, in that the Council will only support

				<u>residential neighbourhoods.”</u>	proposals for such mixed-use redevelopment on sites where there is good public transport accessibility. Action: Remove reference to PTAL in policy and supporting text, and clarify that Council will not support proposals for mixed use schemes where there is poor public transport accessibility.
629	DM465	DP9 on behalf of undisclosed	Density/ floorspace	Seeks change from floorspace to job density: Proposed amendment to part (C): “The maximum amount of employment floorspace is re-provided within the mixed use scheme, with no net loss of existing employment floorspace <u>job density.</u> ”	The Council has completed workspace viability evidence which shows that there is potential for residential use to cross subsidise new workspace on sites in regeneration areas. The policy provides sufficient flexibility to make development viable, in line with the NPPF, by requiring developers to submit a viability assessment demonstrating the minimum amount of residential floorspace is proposed to enable development of employment floorspace. The Council will seek to maximise employment floorspace on this basis. However, the policy will be revised to provide more flexibility for development proposals whilst seeking the maximum reasonable amount of floorspace. Action: Amend policy to provide more flexibility on loss of employment floorspace whilst ensuring proposals deliver the maximum reasonable amount of floorspace.
694	DM466	Iceniprojects on behalf of Berkeley Homes	Not consistent with ELR	This draft Policy is unsound as it is not justified and does not appear to be in line with the recommendations of the Atkins Employment Land Review 2015. It is not reasonable, and it is restrictive, to expect development sites to re-provide existing employment floorspace with no net loss. This doesn't take account of the existing and proposed employment density and job creation of the site, or market signals and local circumstances. It also does not consider the changing nature of the workplace, homeworking and secondary employment locations and the role of town centres. The draft Policy should be amended in this regard.	The Council has completed workspace viability evidence which shows that there is potential for residential use to cross subsidise new workspace on sites in regeneration areas. The policy will be revised to provide more flexibility for development proposals whilst seeking the maximum reasonable amount of floorspace. Action: Amend policy to provide more flexibility on loss of employment floorspace whilst ensuring proposals deliver the maximum reasonable amount of floorspace.
818	DM467	Our Tottenham	Land use	We disagree with the blanket facilitation of mixed use development on employment sites. The guidance recommended by the Employment Land Study on how to provide B-class uses within mixed use schemes has not been provided and should be.	This policy sets out that mixed use will only be encouraged on certain sites, specifically in identified regeneration areas, and areas with good public transport accessibility. The ELS recommends that an SPD is produced to guide the provision of B-class floorspace with in new mixed use development. This document would be required to offer guidance to a policy in the Local Plan.
818	DM468	Our Tottenham	Viability	Para 5.18 gives far too strong a role to viability assessments, which developers will easily 'game' in order to facilitate mixed use development on perfectly viable and well used employment sites. All planning is subject to viability so there is no need to spell this out. If the intention is to restrict mixed use development schemes, this should be done through policy.	Noted. The requirement for all sites to be viable is included in the NPPF. The aim of the supporting text in 5.18 is for developers to prove that a higher value use is required to cross subsidise new employment floorspace. The Council considers that wording to this effect is helpful in ensuring developers understand that the Council is focused on creating genuinely mixed use developments on these types of sites.
818	DM469	Our Tottenham	Affordable workspace	Para 5.19 sets out the Council's expectation that mixed use schemes will deliver 'provision of affordable workspace in perpetuity'. This should be referred to in policy rather than being hidden in supporting text.	The Council considers affordable workspace is necessary to support economic growth and provision will be required where viable.

				'Affordable workspace' should be defined.	
818	DM470	Our Tottenham	Reverse sensitivity	Para 5.20 refers to the importance that mixed use proposals 'will not prejudice the continuation of industrial and business activities'. This should be referred to in policy DM50. Again, guidance needs to be provided on how to deliver industrial uses within mixed use develop and how to conduct mixed use development within industrial areas without damaging them. This is untested.	The aim of the supporting text at 5.20 is to ensure that the amenity of neighbouring employment uses within the area are protected, and that new uses, including new industrial uses, do not adversely affect those neighbouring, and those included within the development proposal 's ability to operate effectively as a new development. It is noted that this can be made clearer in the supporting text. Further guidance on this matter is set out in the Mayor's Land for Industry and Transport SPG. It is considered that the draft DM50.f sets out the principle that mixed uses should not prejudice the continuation of employment generating uses.

Comments on DM51 of the Local Plan: Development Management Policies Regulation 18 consultation Feb-Mar 2015

Respondent ID	Comment ID	Respondent	Topic	Summary of Response	Council Response
400	DM471	Ms J Hancher	Warehousing living, loss of employment floorspace	The policy should not preclude a loss of employment floorspace, since such developments often relate to vacant and underused commercial buildings that will generally be brought back into greater employment use as a consequence of their conversion.	The Council has completed workspace viability evidence which shows that there is potential for residential use to cross subsidise new workspace on sites in regeneration areas. The policy will be revised to provide more flexibility on employment floorspace re-provision whilst requiring proposals to maximise the quantum of employment floorspace and intensification of use. Action: Amend policy to provide greater flexibility on employment floorspace re-provision whilst ensuring an increase of employment densities on site.
430	DM472	Derek Horne & Associates for Majorlink Ltd	Site size	This policy is welcomed but should not be restricted only to the area of Fountayne Rd/Markfield Rd identified in TH9 of the AAP. Nor should it preclude a loss of employment floor space, since such developments often relate to vacant and underused commercial buildings that will generally be brought back into greater employment use as a consequence of their conversion.	The Council has completed workspace viability evidence which shows that there is potential for residential use to cross subsidise new workspace on sites in regeneration areas. The policy will be revised to provide more flexibility on employment floorspace re-provision whilst requiring proposals to maximise the quantum of employment floorspace and intensification of use. Action: Amend policy to provide greater flexibility on employment floorspace re-provision whilst ensuring an increase of employment densities on site.
501	DM473	Daniel Hernandez, warehouse resident	Against new build	Believes this could happen on other sites	Noted.
501	DM474	Daniel Hernandez, warehouse resident	Create new centre	Supports creation of a community centre/market/hub for the area.	Noted. The Council's policy seeks to retain and create new space for these types of outcomes.
501	DM475	Daniel	Maintain current	High amount of value in creative community/economy existing on the	Noted. The policy seeks to regularise this use for existing

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		Hernandez, Warehouse Resident	emerging set up	site.	occupiers and future developments.
501	DM476	Daniel Hernandez, warehouse resident	Maintain current emerging set up	Objects to anything that would obstruct the beautiful unfolding process that has been happening over the last 10-15 years.	Noted. The policy seeks to regularise this use for existing occupiers and future developments. However, the trend for ever more residential use has the potential to set a precedent for the approval of an entirely residential planning consent in the medium-long term. The Council believes that the only way to ensure that the mixed-use character of the area is maintained is to introduce a set of planning policies which manage change.
501	DM477	Daniel Hernandez, warehouse resident	Support creative community	sure the 1000-strong community of upwardly mobile artists will also be very innovative in their ways to keep this incredible oasis bubbling over with enterprise, micro-business, networks of exchange, shared skills and tools, a vast wealth of knowledge and backgrounds	Support for retention of the existing community is noted.
501	DM478	Daniel, Hernandez, Warehouse Resident	Supports redevelopment of other industrial estates	As on this site, old and underused industrial estates can be a source of pollution and crime.	Noted. The retention of industrial estates in some parts of the borough is essential to meeting the objectively identified growth requirements in the borough. The DM Policies Local Plan includes requirements to control and mitigate pollution and promotes Secure by Design principles.
502	DM479	James Britten, warehouse resident, Fountayne Rd	Affordability	Meets affordable housing and affordable workspace needs at the same time.	Noted, provision of affordable housing and workspace are important to the Council.
502	DM480	James Britten, warehouse resident, Fountayne Rd	Makes best use of land	By creating mix of interesting uses, warehouse living makes a sustainable use of old industrial stock.	Noted.
502	DM481	James Britten, warehouse resident, Fountayne Rd	Networking	Existing set up achieves a centre of gravity for creative enterprises	Noted.
502	DM482	James Britten, warehouse resident, Fountayne Rd	Retrofit not redevelop	Contributions to housing and employment target can be met with the financial burden on the landlord rather than the council and without having to get into bed with a large developer	Noted. The Local Plan sets policies necessary to deliver objectively assessed housing and employment needs.
502	DM483	James Britten, warehouse resident, Fountayne Rd	Support creative community	“an oasis” of difference within London that it would be a shame to lose.	Support for retention of the existing community is noted.
502	DM484	James Britten, warehouse resident, Fountayne Rd	Supports keeping employment designation	Notes that changing to residential would change character of the place.	It is considered that the deallocation of sites of this type from employment use altogether would offer little protection to the existing users of the site from a purely residential development coming forward in the future. The Council wishes to see this area contribute to meeting the Borough’s assessed employment need, and as such a RA designation can facilitate this aim while enabling an element of residential use, such as already exists on the site, to continue.
503	DM485	Rich Young, warehouse resident,	Hackney Wick	Notes some people have already been forced out of Hackney Wick.	Noted. The Local Plan seeks to address the borough’s objectively assessed needs for housing and employment.

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		Fountayne Rd			
503	DM486	Rich Young, warehouse resident, Fountayne Rd	Objects to purely commercial designation	Does not believe that a purely commercial designation reflects the assets in the area.	Noted. The policy seeks to regularise the existing uses for existing occupiers and future developments. However, the trend for ever more residential use has the potential to set a precedent for the approval of an entirely residential planning consent in the medium-long term. The Council believes that the only way to ensure that the mixed-use character of the area is maintained is to introduce a set of planning policies which manage change.
503	DM487	Rich Young, warehouse resident, Fountayne Rd	Objects to Resi designation	Notes that changing to residential would price current enterprises out of the area.	Agreed.
503	DM488	Rich Young, warehouse resident, Fountayne Rd	Welcomes improvement	To make the area/ buildings cleaner & safer.	Noted.
504	DM489	Polly Robbins, Overbury Rd Warehouse Resident	Affordable housing	Current residential price is seen as “affordable”	Noted, provision of affordable housing and workspace are important to the Council.
504	DM490	Polly Robbins, Overbury Rd Warehouse Resident	Affordable housing	Current residential price is seen as “affordable”	Noted, provision of affordable housing and workspace are important to the Council.
504	DM491	Polly Robbins, Overbury Rd Warehouse Resident	Against new build	Existing residents won’t go for it.	Noted. The policy provides that local residents will be consulted with regards to the masterplan proposals.
504	DM492	Polly Robbins, Overbury Rd Warehouse Resident	Governance	Supports community management arrangement.	Noted, the management arrangement of the units is outside the scope of the plan.
505	DM493	Miriam Maselkowski, Fountayne Rd resident	Affordability	Meets affordable housing and affordable workspace needs at the same time.	Noted, provision of affordable housing and workspace are important to the Council
505	DM494	Miriam Maselkowski, Fountayne Rd resident	Entrepreneurialism	Positive environment to start and run a business.	Noted. The policy seeks to ensure the retention of employment uses on sites.
505	DM495	Miriam Maselkowski, Fountayne Rd resident	Likes the area	Positive sense of community between the firms and population in the area.	Noted.
506	DM496	Johannes Kaufhold, Eade Rd	Collaborative enterprise	Living communally breeds innovation.	The Council notes that existing residents of the site wish to continue to have flexible, collaborative, round the clock, access to workspace as part of their living arrangement. This is

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		resident			supported in the policy.
506	DM497	Johannes Kaufhold, Eade Rd resident	Increasing skills	Living communally allows transfer of skills between individuals within the group.	Noted. The Council recognises the positive contribution of the existing community in employment and skills development and is seeking to regularise current uses through this policy.
506	DM498	Johannes Kaufhold, Eade Rd resident	Social mix	Living communally brings people from a wide range of backgrounds together to share ideas	Noted. The Council recognises the positive contribution of the existing community in employment and skills development and is seeking to regularise current uses through this policy.
507	DM499	Andrea Ling, Fountayne Rd studio occupant (work)	Adverse to change	Current "organic" set up works well from respondent's perspective	Noted.
507	DM500	Andrea Ling, Fountayne Rd studio occupant (work)	Capped rents	Supports capping rent increases.	Support is noted.
507	DM501	Andrea Ling, Fountayne Rd studio occupant (work)	Size of units	A "one size fits all" unit size would not meet the needs of commercial occupants	Agreed. The policy provides for flexibility in the delivery of business accommodation on site.
508	DM502	Lara Cebrian-Twist, warehouse resident	Community	The area allows collaboration between individuals to create cultural output.	The Council notes that existing residents of the site wish to continue to have flexible, collaborative, round the clock, access to workspace as part of their living arrangement. This is supported in the policy.
508	DM503	Lara Cebrian-Twist, warehouse resident	Opportunity cost	Redevelopment causing evictions would increase both affordable housing and employment need.	Disagree. The policy seeks to regularise current uses. It is considered that comprehensive redevelopment will provide for the needs of existing and future occupants. The Council believes there is a greater level of benefit in building on the current strengths of the area.
508	DM504	Lara Cebrian-Twist, warehouse resident	Unique space	Few other locations such as this in London	Noted.
509	DM505	CgMs on behalf of Parkstock Ltd	Original floorspace	Regard the re-provision of their lawful employment floorspace quotes at higher densities as suitable, and "fair". Object to proposal to require "original" floorspace to be re-provided.	The Council has completed workspace viability evidence which shows that there is potential for residential use to cross subsidise new workspace on sites in regeneration areas. The policy will be revised to provide more flexibility on employment floorspace re-provision whilst requiring proposals to maximise the quantum of employment floorspace and intensification of use. Action: Amend policy to provide greater flexibility on employment floorspace re-provision whilst ensuring an increase of employment densities on site. Policy to have regard to lawful planning uses on sites in establishing the existing baseline with respect to intensification of employment offer.
512	DM506	Billie De Melo Wood,	Affordability	Meets affordable housing and affordable workspace needs at the same time.	Noted, provision of affordable housing and workspace are

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		warehouse resident			important to the Council.
513	DM507	Alex Tennyson, warehouse resident	Regeneration impact	Points to regenerative effects warehouse living has had further down the A10	Noted.
513	DM508	Alex Tennyson, warehouse resident	Support some intervention	Need for Health & safety and regulations to be upheld and long-term approach to be taken.	Support is noted.
514	DM509	Chloe Gott, warehouse resident	Affordability	Meets affordable housing and affordable workspace needs at the same time.	Noted, provision of affordable housing and workspace are important to the Council
514	DM510	Chloe Gott, warehouse resident	Support creative community	Believes this community is of great value to the rest of Haringey as well.	Support for retention of the existing community is noted.
514	DM511	Chloe Gott, warehouse resident	Support live/work	Do not wish to see the land allocated as either residential or commercial.	Noted. The Local Employment Area - Regeneration Area designation, wherein Warehouse Living will be permitted, will ensure sufficient protection of employment uses whilst enabling appropriate mixed use development.
516	DM512	Alison Lucas, warehouse resident	Support creative community	We are part of an amazing community and We want it to stay the way it is	Support for retention of the existing community is noted.
517	DM513	Camilla Mason, warehouse resident	Support creative community	The community is vibrant and inspiring and one of the happiest places I have ever lived. It is full of inspiring people who are keen to collaborate and create with each other as well as in the surrounding area	Support for retention of the existing community is noted.
517	DM514	Camilla Mason, warehouse resident	Work with Council	Willing to work with the Council to create sustainable future.	Noted, it is agreed that collaboration between the Council and existing residents will be important to ensure a positive outcome for the area.
518	DM515	Louis Rutherford, warehouse resident	Cultural offer	Tottenham, and the Fountayne Road hub, has already been identified by the V&A Museum as having one of the most vibrant art scenes in London alongside Peckham, Shoreditch/Dalston and Hackney Wick. On the 28 th March, 2014, Tottenham artists were invited to 'takeover' the gallery in a celebration of the creativity inherent in the area	Noted.
518	DM516	Louis Rutherford, warehouse resident	ELR criticism	Examples of live/work failing in ELR are out of date and don't reflect current position.	The Council does not support live/work as there is evidence to suggest that the employment benefits of this type of accommodation are not substantial. The Council is introducing the Warehouse Living concept to regularise existing uses in the area.
518	DM517	Louis Rutherford, warehouse resident	History	As I understand it, this adaptation to live/work was once authorised by the council, however, in recent years renewal applications for continued live/work status have stalled/ I understand that on Fountayne Road, the council is reticent to allow the use of the warehouse buildings to be converted to residential use by the landlords	Noted. The Council does not support live/work as there is evidence to suggest that the employment benefits of this type of accommodation are not substantial. The Council is introducing the Warehouse Living concept to regularise existing uses in the area.
518	DM518	Louis Rutherford, warehouse	Local residents happy (in Poplar)	the assertion of Chief Executive of the Poplar HARCA, Steve Stride that "our residents are happy that artists with a genuine commitment to the local community have been able to make a home [...] in properties that	Noted.

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		resident		were prone to squatting and associated anti-social behaviour”	
518	DM519	Louis Rutherford, warehouse resident	Successful example	Since 2007, Bow Arts, an Arts Council-funded educational charity has worked with social landlord – Poplar HARCA – to develop over 150 live/work studios in Tower Hamlets and has contributed over £250,000 back into the local community	Noted.
518	DM520	Louis Rutherford, warehouse resident	Successful example	Fountainy residents wish to start an Arts Council funded not-for-profit.	Noted.
518	DM521	Louis Rutherford, warehouse resident	Support creative community	Artists must be seen to be benefitting the local economy, having a positive impact in their community and meeting Council employment targets as set by the GLA. The landlords and council can facilitate this process through assisting the live/work community in formalising the existing warehouse quarter to form a thriving cultural hub for the area	Support for retention of the existing community is noted.
518	DM522	Louis Rutherford, warehouse resident	Work with Council	By working directly with the current occupants, the Council can avoid the failings suffered by other London councils a decade ago where the development of new live/work units were being used solely for residential purposes and developers were permitted to side-step the employment promotion and affordable housing policy requirements.	Noted, it is agreed that collaboration between the Council and existing residents will be important to ensure a positive outcome for the area.
519	DM523	Melanie Powell, warehouse resident	24 hour culture	The ability for musicians to work into the early hours composing or playing in a community that can not only tolerant but accommodate their needs is priceless	Noted. The DM Policies set out further requirements in regard of protection of amenity.
519	DM524	Melanie Powell, warehouse resident	Current uses obsolete	Returning the industrial spaces around the Seven Sisters/Tottenham Hale and Manor House areas that have become live work communities to employment land, is not feasible - the land was re-purposed, all be it unofficially by its tenants, as it wasn't being used by businesses in the first place	Noted. The buildings are currently being used for a higher value use, and therefore it is unlikely that it will return on viability grounds. What the Council is proposing however is to introduce new employment uses, more in keeping with the emerging character of the area.
519	DM525	Melanie Powell, warehouse resident	Support creative community	By changing this land you would change a community leave your door open, borrow a cup of sugar, share food with neighbours or be struggling home with bags and be offered a lift?	Support for retention of the existing community is noted.
520	DM526	Antonella Di Carlo, warehouse resident	Benefits of multicultural communal community	<p>Fountainy Rd is a community and is a cultural hub. Where people from all around the world and from very different backgrounds come and live together. The outcome of this geographical proximity creates numerous results.</p> <ol style="list-style-type: none"> 1. Sharing ideas 2. Creation of partnership 3. Access to a Network 4. Sharing resources and skills in the local area 5. Creation of an urban community 6. Supportive environment 7. Brings wealth to the local area 8. Is an example of the multicultural nature of London where people literally, from so different backgrounds share with respect a 	The Council notes that existing residents of the site wish to continue to have flexible, collaborative, round the clock, access to workspace as part of their living arrangement. While this is encouraged as it has the potential to yield positive economic benefits resulting from collaboration, the Council also want to promote other firms to use this area as an employment location. Clearly to achieve this second aim, a degree of separation, be it within a building, or in separate buildings, will be required. This Allocation will not contain detailed specifics on how this can be achieved, but rather seeks to establish a framework in which it can happen over the longer term.

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				street.(Local Church, professionals, students, people that work there etc...)	
521	DM527	Ali Lockhead, warehouse resident	Communality	When you're working on a creative project to get it to a point where you can submit it for funding or have something tangible to sell it's really hard. As well as paying for studio rent you have to pay for materials and of course fund your existence. To be able to swap talents and collaborate with others, get help with a sound track, some filming or photography etc is invaluable.	The Council notes that existing residents of the site wish to continue to have flexible, collaborative, round the clock, access to workspace as part of their living arrangement. This is supported in the policy.
521	DM528	Ali Lockhead, warehouse resident	Global competition	It will such a shame if the talent ends up relocating to possibly Amsterdam or Berlin	It is noted that the existing population make a positive contribution to the area.
521	DM529	Ali Lockhead, warehouse resident	Point of different	London too "corporate" these areas offer difference	Noted.
521	DM530	Ali Lockhead, warehouse resident	Support creative community	There is a wealth of artistic talent in this community where people inspire and support one another and where people are also keen to work with the local community, recognising music, art, filmmaking, fashion design, creative writing etc can engage young people who have otherwise become disaffected and help them get on track.	Support for retention of the existing community is noted.
522	DM531	Jouna Lansman, warehouse resident	Communality	I am a big believer in communal living and it's effect in improving human kindness and understanding. We live like a big family cooking and cleaning together and whatever else, which in turn promotes tolerance and open-mindedness. This way people are prone to help and socialise with each other and I can feel that being great for one's mental well being	Noted. The Council's policy seeks to retain and create new space for these types of outcomes.
522	DM532	Jouna Lansman, warehouse resident	Innovative policy	Perhaps even pioneer a countrywide legislation of changing planning permission categories to include live/work? As it stands, this is not in existence at the moment.	The proposed policy is considered to be unique in its approach. The Local Plan sets a framework for development within the Borough.
522	DM533	Jouna Lansman, warehouse resident	Middle class	We are middle class professionals and generally pleasant people that pay taxes and contribute positively in the area. I hope you will take these things into consideration in your consultation.	Noted. This is outside the scope of the Local Plan.
522	DM534	Jouna Lansman, warehouse resident	Support creative community	Supporter of warehouse (and other off-plan) living in our council and everywhere else	Support for retention of the existing community is noted.
523	DM535	Matt Mead, warehouse resident	Affordability	It seems to me that the community that already exists here provides affordable housing and economic activity for the area - two things that the council wishes to foster in the borough	Noted, provision of affordable housing and workspace are important to the Council
523	DM536	Matt Mead, warehouse resident	Economic development	Area creates positive environment for new firms, cited Odasho Ltd & Craving Coffee	Noted. The policy seeks to build on the area's strength in supporting the local economy.
523	DM537	Matt Mead, warehouse resident	Regeneration impact	I think it is important to stress once again how important live/work can be for regenerating an area, as has been seen in Hackney Wick and Dalston.	Noted. The policy seeks to regularise existing uses in the area.
523	DM538	Matt Mead, warehouse resident	Support creative community	I am very pleased to note the council's changed position to the warehouse dwelling in Haringey from the original plan of mass evictions to something more sensitive to the current communities already existing there	Support for retention of the existing community is noted. The policy seeks to regularise existing uses in the area.
524	DM539	Anastasia Niedinger,	Collaboration	Gaining skills via collaboration with our neighbours	The Council notes that existing residents of the site wish to continue to have flexible, collaborative, round the clock, access

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		warehouse resident			to workspace as part of their living arrangement.
524	DM540	Anastasia Niedinger, warehouse resident	Diversity of industries and professions	Include, but are not limited to: Arts, sculpture, and curation of installations in and around London; Music; Neuroscientific research; Advertising production; Graphic design; Fashion NGO; Higher education.	Noted. Council acknowledges the diversity of residents in the area. The policy seeks to support a range of employment generating uses and provision of accommodation for related skills and training.
524	DM541	Anastasia Niedinger, warehouse resident	Education	On a larger scale, the warehouse districts (Seven Sisters/Tottenham, Manor House) constitute educational environments, containing specialised spaces designed for the execution of all manner of projects, including engineering, architecture, sculpture, creative production (photography, digital, print) and much more	The Council is seeking to create opportunities for further employment opportunities in knowledge-driven sectors in this area.
524	DM542	Anastasia Niedinger, warehouse resident	Education	small but growing student population, many of whom are conducting PhDs with inner city universities (UAL, UoL), and are able to gather data from a large pool of nearby participants	The Council is seeking to create opportunities for further employment opportunities in knowledge-driven sectors in this area.
524	DM543	Anastasia Niedinger, warehouse resident	Type of space	Our spacious, dynamic habitat enables each resident to establish a place of both living and work, while gaining skills via collaboration with our neighbours	Noted. The Council's policy seeks to retain and create new space for these types of outcomes.
524	DM544	Anastasia Niedinger, warehouse resident	Work with Council	Warehouse residents are eager to continue working closely with the council, in order to sustain the wider community and it's economy innovatively. To undermine their existence would be the removal of a precious asset, if not the destruction not just of people's homes, but of their working livelihoods.	Noted, it is agreed that collaboration between the Council and existing residents will be important to ensure a positive outcome for the area.
527	DM545	Tom Peters, Warehouse Residents Group (WHAT)	Management of spaces	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).	Noted, the management arrangement of the units is outside the scope of the plan.
527	DM546	Tom Peters, Warehouse Residents Group (WHAT)	Masterplanning	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.	Noted. The benefit of preparing masterplans is that the principles of the policy can be applied appropriately across the sites that make up the areas covered by this policy. The requirement for existing resident's needs to be assessed through any masterplan in the Policy.

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527	DM547	Tom Peters, Warehouse Residents Group (WHAT)	Note positive shift	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.	Support is noted.
527	DM548	Tom Peters, Warehouse Residents Group (WHAT)	Support Policy	We support the principle stated in point (c) of the policy towards the retention of the warehouse communities' existing and future accommodation needs. and 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.	Support is noted.
528	DM549	Bethany Gardiner-Smith on behalf of WHAT	Management of spaces	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).	Noted, the management arrangement of the units is outside the scope of the plan.
528	DM550	Bethany Gardiner-Smith on behalf of WHAT	Masterplanning	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.	Noted. The benefit of preparing masterplans is that the principals of the policy can be applied appropriately across the sites that make up the areas covered by this policy. The requirement for existing resident's needs to be assessed through any masterplan in the Policy.
528	DM551	Bethany Gardiner-Smith on behalf of WHAT	Note positive shift	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.	Support is noted.

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530	DM552	Planning Co-Operative on behalf of Fountayne Business Centre Group	Affordable workspace	The AAP does not strongly address the need for affordable workspace for local industries and groups and the FBC site proposes ways in which this can be achieved.	Noted, provision of affordable housing and workspace are important to the Council
531	DM553	Sam Elie, warehouse resident	Affordable commercial	If too much of the land in the warehouse community is turned from live/work spaces to strictly commercial spaces or if rents become unaffordable, the people who can turn the area towards an arts & cultural hub will be forced to leave	Noted, provision of affordable housing and workspace are important to the Council
531	DM554	Sam Elie, warehouse resident	Too much employment	If too much of the land in the warehouse community is turned from live/work spaces to strictly commercial spaces or if rents become unaffordable, the people who can turn the area towards an arts & cultural hub will be forced to leave	The Council has completed workspace viability evidence which shows that there is potential for residential use to cross subsidise new workspace on sites in regeneration areas. The policy seeks to ensure the host community's existing and future accommodation requirements for living and working are taken into account in any future site masterplanning exercises.
531	DM555	Sam Elie, warehouse resident	Work with Council	I am confident that the council and the warehouse tenants can work together to build a better and much loved Haringey.	Noted, it is agreed that collaboration between the Council and existing residents will be important to ensure a positive outcome for the area.
532	DM556	Shelly Jones, warehouse resident	Affordability	Living in the warehouse community has provided me with the space possible to create my art and to meet and collaborate with a vast array of other artists in an affordable space.	Noted, provision of affordable housing and workspace are important to the Council
532	DM557	Shelly Jones, warehouse resident	Affordable housing	It would be a huge discredit to the borough to remove hundreds of people from their homes, whether warehouses, houses or apartments. The people here make Haringey an interesting place to live and work and if removed would likely struggle to find new spaces with affordable rent.	Noted, provision of affordable housing and workspace are important to the Council. The policy seeks to regularise current uses in the area.
532	DM558	Shelly Jones, warehouse resident	Design of units	Open plan layout essential for warehouse living lifestyle	Noted. The policy includes considerations for site layout and design having regard to the host community's requirements.
532	DM559	Shelly Jones, warehouse resident	International collaboration	For us this is a way to meet new people, people who have come from all over the world and chosen to live in Haringey because of the warehouse community, for us to work together, support each other and live as a community, and as a family	Noted.
533	DM560	Heather Wilson, warehouse resident	Support warehouse community	My flatmates and I enjoy working and living here and have always been responsible members of the community. I have made professional and personal connections here in a way that wouldn't have been possible in another type of accommodation.	Support for retention of the existing community is noted.
533	DM561	Heather Wilson, warehouse resident	Work with Council	Speaking to my neighbours, I think we are all willing to cooperate and come to the best solution possible for the neighbourhood. We all want to continue living here and I hope you're able to take our feedback into consideration.	Noted, it is agreed that collaboration between the Council and existing residents will be important to ensure a positive outcome for the area.
535	DM562	Ellis Gardiner, warehouse resident	Affordability	A reduction in residential and warehouse-living type uses directly equates to a reduction in the potential for affordable living and working spaces.	Noted, provision of affordable housing and workspace are important to the Council.
535	DM563	Ellis Gardiner, warehouse	Employment densities	Former uses have very low employment densities (1 employee per 138-204m ²), New River Studios operates presently at 1 employee per 30m ² ,	Agreed. The Local Plan policies broadly seek an intensification of uses on employment sites and floorspace.

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		resident		with potential to increase to 1/21m ² . Much higher numbers of employment can be brought forward on smaller floorspaces using modern densities.	
535	DM564	Ellis Gardiner, warehouse resident	Employment floorspace	Support the "Eade Road condition" and maintain that 25% of the floorspace of a warehouse living unit should be available for work from Monday to Friday, then this figure should count towards the employment floorspace total for the estates. Many workplaces are inaccessible during evenings and weekends (even if the staff were to want to work overtime), making them in essence no different to the multi-function space warehouses offer.	Noted. The Council's expectation is that future development proposals will provide sufficient protection for amenity of residents and neighbouring occupiers, in line with other DM Policies.
535	DM565	Ellis Gardiner, warehouse resident	Jobs Vs floorspace	It is my belief that these estates can support comparable numbers of jobs to their former uses in a way that does not destroy the fabric of what exists. Of course, far more people live in Haringey than twenty years ago, so the demand for jobs is greater, and it is my hope that by increasing density rather than floorspace, and by striking a sustainable balance of uses, these estates could actually support more and better jobs than they ever did.	Noted. It is expected that land will be used more intensively in order to meet the spatial objectives for the borough.
535	DM566	Ellis Gardiner, warehouse resident	Level of resi	A reduction in the warehouse community of over 60% would completely alter the complexion and fabric of the estates and would not help to "retain" the current community at all. There are over 600 residential units in the area to which the current proposal allocates only 220 units. This removes almost two-thirds of the community	This policy makes provision for meeting the needs of the existing residential population.
535	DM567	Ellis Gardiner, warehouse resident	Supports warehouse community	Not only is the financial cross-investment essential, but also the investment of social capital which comes from the people who live here. We welcome the opportunity to share the some of our artistic output with the local community, but that prospect becomes significantly less attractive when the community is reduced by two-thirds.	Support for retention of the existing community is noted.
535	DM568	Ellis Gardiner, warehouse resident	Too much employment	Requirement to reprovide original employment floorspace would have negative consequence due to loss of warehouse living floorspace. At the same time, the proposed reintroduction of 17,900 square metres of purely commercial space would mean that the "warehouse-living" and residential components of the estates would be outweighed by commercial uses by a factor of 4:1 or more. For a community that is based on networks and proximity of uses, this would be devastating.	The policy seeks to ensure the host community's existing and future accommodation requirements for living and working are taken into account in any future site masterplanning exercises. The Council has completed workspace viability evidence which shows that there is potential for residential use to cross subsidise new workspace on sites in regeneration areas. The policy will be revised to provide more flexibility on employment floorspace re-provision whilst requiring proposals to maximise the quantum of employment floorspace and intensification of use. Action: Amend policy to provide greater flexibility on employment floorspace re-provision whilst ensuring an increase of employment densities on site.
535	DM569	Ellis Gardiner, warehouse resident	Viability	The Site Allocations DPD identifies that residential uses would have to financially support the commercial and mixed uses, but this is not sustainable if so much of the (existing, warehouse living) residential community is removed. It does not make sense to reduce the source of funding, and simultaneously increase the need for that funding.	In order to meet the housing and employment needs in the borough, high value use, such as residential to cross subsidise less valuable, such as affordable housing and employment.
536	DM570	Ben Hashim, warehouse resident	Affordability	provide a valuable source of affordable housing/studio space primarily for creative people who are essential in maintaining and expanding London's reputation as a world-leading creative hub	Noted, provision of affordable housing and workspace are important to the Council.
536	DM571	Ben Hashim, warehouse resident	Benefit to London	provide a valuable source of affordable housing/studio space primarily for creative people who are essential in maintaining and expanding London's reputation as a world-leading creative hub	Noted, provision of affordable housing and workspace are important to the Council.

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536	DM572	Ben Hashim, warehouse resident	Supports warehouse community	To make any changes which threaten the existence of the warehouse environment, would lead directly to a decrease in young innovative creative talent residing here. Although this may not have a palpable effect immediately, what will happen is that in years to come when the interesting flavour of the area will be irreparably weakened, people will only be able to look back in nostalgia. In the end Haringey will become a faceless bleak area lacking in a unique energy which characterises it today	Support for retention of the existing community is noted.
537	DM573	Joel Morley, warehouse resident	Council budget	If these things are maintained then the warehouse inhabitants are able to inject value into the area completely autonomously of the council and the Councils budget.	Noted. The Council recognises the positive contribution of the existing community is seeking to regularise current uses through this policy.
537	DM574	Joel Morley, warehouse resident	Preconditions	The things keeping people in the community are <ul style="list-style-type: none"> • The lower than average rents • Space within the building to allow a live/work lifestyle • The industrial aesthetic making residents feel united as a result of our habitat strongly contrasting with the surrounding environment • Avoidance of things like agents fees and general profiteering from housing 	Noted.
537	DM575	Joel Morley, warehouse resident	Supports warehouse community	The power of community can offer a much greater development of the area for a much smaller cost to the local council. If the 'community atmosphere' is maintained then everyone who lives there feels like they own part of the land that everyone walks on. This increases the social responsibility everyone takes and can lead to development of shared spaces e.g. more foliage and greenery, murals/art pieces on bare walls, better care of environment and buildings. All these things are done at no cost to the council at all. These listed examples have already been done by volunteers at their own cost for the benefit of everyone.	Support for retention of the existing community is noted. The Council recognises the positive contribution of the existing community is seeking to regularise current uses through this policy.
537	DM576	Joel Morley, warehouse resident	United front	The Warehouse collective are a united front and in sending this email I'm also advocating all the other ideas sent in by other members	Noted.
538	DM577	Abi Sehmi, warehouse resident	Affordability	a significant part of what forms this community is the work/live environment, it also is part of what makes the area an affordable place for creative people to live (it is important to note that by the term 'live' I do not merely mean a place to lay their head and keep from the rain but a place to carry out their lives - ignite and establish businesses and personal projects, build relationships, develop ideas)	Noted. Provision of affordable housing and workspace are important to the Council.
538	DM578	Abi Sehmi, warehouse resident	Affordability	there are movements already in place (i.e. residents having already registered a housing co-operative with the FCA) that aims to work towards a not-for-profit management structure that would amongst other things, help stabilise rents, and see an increase in affordable workspaces leased	Noted, Provision of affordable housing and workspace are important to the Council.
538	DM579	Abi Sehmi, warehouse resident	Character of the area	Looking to prize the character or existing buildings and particularly retain them as affordable environments	Noted, Provision of affordable housing and workspace are important to the Council.
538	DM580	Abi Sehmi, warehouse resident	Industrial/communality link	the industrial quality of the sites, the vast spaces, and the communal nature that accompanies them and appeals to the current residents, who provide the area with its character and outward influence would be inherently undermined by development required to create a further	It is noted that these qualities are highly valued by existing residents. The policy sets out that the masterplan should respond to the accommodation needs of existing residents, including provision of communal space.

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				increase in employment	
538	DM581	Abi Sehmi, warehouse resident	Protect SINC	Behind Omega Works, The Crusader Industrial Estate and Arena runs an ecological corridor which should most definitely be preserved. These slopes act as a significant green area, creating ecological sites for birdlife, insects and larger animals to harmoniously thrive, and connect to the nature corridor which runs along the Overground Line from Barking to Gospel Oak. Local residents have actively worked to clear this area of invasive species and tipped rubbish, and this hard work should not be negated, nor the positive effects for the environment and animals that inhabit it.	The ecologic corridor will be protected in the Plan.
538	DM582	Abi Sehmi, warehouse resident	Retain existing buildings	I have also noted that in Omega Works, Arena Design Centre and Overbury/ Eade Road (where I currently reside) there appear to be plans for large scale re-development. Any mass re-development negates the will to retain the existing environment. There is a history and character to the existing sites that is integral to their current use and essence of the community which should not be overlooked. As such, sites should only be re-developed if absolutely necessary after exhausted attempts to retain, improve and regularise the buildings that already exist, and any developments which do occur should be done with current residents in mind.	The Council is required to meet objectively identified needs to create new housing and employment opportunities in the borough. There will therefore be some development required in order to meet these needs. It is considered that the appropriate provisions to protect and build on existing strengths within the area are contained within the policy.
538	DM583	Abi Sehmi, warehouse resident	Supports warehouse community	Firstly I would say that I appreciate what seems to be a positive movement in the manner with which the Council regards the warehouse community, acknowledging that we are an established community with needs to be met, and a desire to remain a community existing as we do in the area. As someone who has lived as part of the warehouse community for the last four years I have seen the positive impact we exact upon the area first hand, and am immersed in the creative, productive environment that is both my home and workplace, and so it brings me pleasure to see Haringey Council has also noted this impact	Support for retention of the existing community is noted. The Council recognises the positive contribution of the existing community is seeking to regularise current uses through this policy.
538	DM584	Abi Sehmi, warehouse resident	Unsuitable for employment	The way the area stands in the present day there is a saturation of employment and productivity that could not be matched by a return to the land's original purpose, and could not be recreated with any blunt or brash intervention.	There is evidence suggesting that there is demand for workspace in this area if floorspace is appropriately marketed.
539	DM585	Ruben de la Rive Box, warehouse resident	Affordability	Having looked for a suitable and (relatively) affordable place to live and work as an independent artist/designer maker, I am thrilled to have found one of the last gems of London, where me and my wife have found a place where we have the space and environment to create work, develop our practice and business and engage with likeminded people	Noted. Provision of affordable housing and workspace are important to the Council
539	DM586	Ruben de la Rive Box, warehouse resident	Supports warehouse community	We have the space and environment to create work, develop our practice and business and engage with likeminded people. Since we moved into our warehouse unit our practice has flourished creatively and practically. The many people living around us have welcomed us and inspired us in our practice and contributing to one of the creative hotspots of London.	Support for retention of the existing community is noted.
540	DM587	Jeremy Guth, warehouse resident	Affordable	These warehouse units have become centres of art, culture, music and self-employment, they allow the development of flexible and low-overhead self-run businesses that simply would not be possible under other rental conditions	Noted. Provision of affordable housing and workspace are important to the Council.
540	DM588	Jeremy Guth, warehouse resident	Against residential or employment zoning	I love our community and do not want it to be diluted or dissinigrated though either residential re-zoning or employment-only re-zoning. There is likely more employment here currently than has been for many decades of decay. We want to retain full live/work status	The regeneration area designation is the only designation which can suitably deliver the Council's spatial vision in terms of retention of jobs, and housing. Furthermore, the deallocation from employment altogether would offer little protection to the existing users of the site from a purely residential development

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					coming forward in the future.
540	DM589	Jeremy Guth, warehouse resident	Supports warehouse community	There are thousands like me in Haringey - working and living from these units, in a supportive community encompassing many different creative and non-creative pursuits. We are trapeze artists, painters, circus performers, musicians, freelance entrepreneurs, digital creatives and much more. We are able to make and do things here a result of our immersive environment of live/work/community. These three elements are inseparable - live/work/community. love our unit the way it is, we do not want forced renovations. We moved into it by free choice (it wasn't a difficult decision!)	Support for retention of the existing community is noted.
541	DM590	Angus Greig, warehouse resident	Economy	Warehouses are important in enabling small creative businesses to emerge and grow.	Noted.
542	DM591	Melanie Cooper, resident	Cultural offer	I am writing to say that I live very close to the warehouse community and I feel it adds a huge amount to Seven Sisters. I have been to events and artistic shows and music there and it is always a real pleasure. Seven Sisters needs more cultural/artistic venues like this not less.	Noted.
542	DM592	Melanie Cooper, resident	Work with Council	I would be interested in working with the council to make this (improved cultural offer from warehouse area) happen.	Noted, it is agreed that collaboration between the Council and existing residents will be important to ensure a positive outcome for the area.
543	DM593	Habiba Nh, warehouse resident	Affordability	As student I can not pay the rent for a room plus another rent for a trayning space to do my homework and artistic research	Noted. Provision of affordable housing and workspace are important to the Council.
543	DM594	Habiba Nh, warehouse resident	Knowledge exchange	Living in a warehouse brings me also the opportunity to exchange a lot of knowledge and information about all what has to do with contemporary art movements, styles and ethics with my neighbours. This is a place full of creativity from where the contemporary culture of the city benefits.	Noted.
544	DM595	Tim Whitehouse, warehouse resident	Example	I've been asked to send an email explaining why we consider warehouse life so essential to artistic communities and London as a whole. Please have a look at our website which gives an overview of everything that goes on in ours, and the people who work or live here www.wearethehub.london	Noted.
545	DM596	Pereira Sodre	Supports warehouse community	I rehearse and record in many studios in this area, and the studios and quite unique cause it's not just a studio but it's a place where I can meet with a lot of different people, from artists to carpenters, who have a sense of community. In this tough place that is London, it's quite rare to find a relief from the day to day struggle, and find people ready to help you. Thoses kind of places are the cities lungs, as much as any forest can be, and destroying them would only contribute in making London a bit colder and harder. People would go somewhere else of course, somewhere not too expensive, so of course, far from the center. Until they make life there easier, making people want to move there, attracting interest from developpers and starting the process all over again	Support for retention of the existing community is noted.
546	DM597	Robert Fung, warehouse resident	Supports warehouse community	I'm writing to air my support of the current warehouse community in the Tottenham hale area. I have lived my whole life in London, in a number of different parts of it and have never lived anywhere with such a strong sense of community. It is a great place to live and work and it would be huge loss to have it turned into any other new housing development, or	Support for retention of the existing community is noted.

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				the like.	
546	DM598	Robert Fung, warehouse resident	Work with Council	Im sure you will find that all the people who live and work in the area of are very reasonable and understand the need for change. It would be great if you to opened up a true dialogue with all interested groups and found a solution that was to the benefit and growth to all involved.	Noted, it is agreed that collaboration between the Council and existing residents will be important to ensure a positive outcome for the area.
547	DM599	Philippe Peters, warehouse resident/ rock star	24 hour noise	The freedom of being able to have a space I could soundproof properly, work in seriously, is something that is otherwise plainly IMPOSSIBLE to find in London. It changed my life, I could have a real place to work right where I was living	Noted. The DM Policies set out further requirements in regard of protection of amenity.
547	DM600	Philippe Peters, warehouse resident/ rock star	Affordability	there are a lot of people in my situation and let's face it, we cannot afford to have a living space and a separate studio/workshop, this is right impossible.	Noted, provision of affordable housing and workspace are important to the Council
548	DM601	Selina Mayer, warehouse resident	Cultural benefits	It also disregards the huge cultural benefit of having our community in Haringey. The area would lose it's character as you broke up and dismantled an inspiring, supportive and vibrant community in favour of multi-levelled "working floor space" intended for a currently unknown future workforce.	The Council notes that existing residents of the site wish to continue to have flexible, collaborative, round the clock, access to workspace as part of their living arrangement. While this is encouraged as it has the potential to yield positive economic benefits resulting from collaboration, the Council also want to promote other firms to use this area as an employment location. Clearly to achieve this second aim, a degree of separation, be it within a building, or in separate buildings, will be required.
548	DM602	Selina Mayer, warehouse resident	Work with Council	Residents are eager to be involved and contribute to Haringey's future - this should be utilised	Noted, it is agreed that collaboration between the Council and existing residents will be important to ensure a positive outcome for the area.
549	DM603	Will Coldwell, warehouse resident	Cultural attraction	Community spaces that could be shared by locals - whether they are "creative" or not - would be a fantastic addition to the area, and the warehouse area has huge potential to become an alternative area of the city that could attract visitors to Haringey. Ultimately, what it comes down to is the fact that areas like the warehouse district are incredibly rare. Not only in London but around the world. The council needs to realise the importance of preserving this kind of area in urban spaces	Noted. Provision for this type of space is provided for in the Site Allocations that complement this policy.
549	DM604	Will Coldwell, warehouse resident	Housing Need	I support plans to ensure the warehouses are safe to live in however I can never support development decisions that will lead to the homelessness of people in the capital. I believe the council should offer reassurances that residents will be safe in their homes, before engaging in a collaborative plan to see how the area can be developed for the future benefit of everyone who lives in Haringey and further afield	Noted, it is agreed that collaboration between the Council and existing residents will be important to ensure a positive outcome for the area.
549	DM605	Will Coldwell, warehouse resident	Safety	Support plans to ensure the warehouses are safe to live in	Noted.
549	DM606	Will Coldwell, warehouse resident	Supports warehouse community	the council is missing a great opportunity to develop a creative community in Haringey that could take a similar form to what has been seen in Hackney Wick. The Hackney Wicked festival is a fantastic example of the way the artist and musicians living there were able to transform the area into a cultural destination. As the warehouse community proved with the InHouse film festival, there's no reason why this kind of thing can't become a regular occurrence in the area	Support for retention of the existing community is noted.
549	DM607	Will Coldwell,	Supports	That Haringey council is set on a path to follow the usual trend in	Support for retention of the existing community is noted.

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		warehouse resident	warehouse community	London in which a grassroots, self-made community is replaced with a range of developments that cater to a wealthier demographic, creating another bland, homogenous area of overpriced housing in the capital.	
549	DM608	Will Coldwell, warehouse resident	Work with Council	Residents are eager to be involved and contribute to Haringey's future - this should be utilised	Noted, it is agreed that collaboration between the Council and existing residents will be important to ensure a positive outcome for the area.
551	DM609	Alay Paun, warehouse resident	Affordability	Our main threats are rising rents and developers	Noted. Provision of affordable housing and workspace are important to the Council
552	DM610	Oscar Diaz, warehouse resident	Against residential designation	I do not wish to see the sites changed to an overall designation of residential, as this would create a large uplift in the value of the land which would threaten our continuing existence on the sites. I do support the continuation of live/work across the sites. This gives us the flexibility of working without the heavy overheads that renting an office or workshop space adds to our cost of running the business.	The regeneration areadesignation is the only designation which can suitably deliver the Council's spatial vision in terms of retention of jobs, and housing. Furthermore, the deallocation from employment altogether would offer little protection to the existing users of the site from a purely residential development coming forward in the future.
552	DM611	Oscar Diaz, warehouse resident	Small business	The live/works spaces that this are provides are much needed to create a community of independent professionals, most of them working within the creative industries. My neighbours work as interior designers, photographers, fashion designers, programmers, They all contribute to a network of small business, creating value through making and developing new products or services	The Council is seeking to create opportunities for further integration of this existing network with the wider Haringey business and residential community.
552	DM612	Oscar Diaz, warehouse resident	Supports warehouse community	I have lived in this area for around 7 years, and I have seen it change for better as more and more creative people have moved into renewed warehouses, (some of them used to be derelict and host illegal raves, just a few years ago).	Support for retention of the existing community is noted.
553	DM613	Ellis Gardiner on behalf of New River Studios CIC	Regeneration potential	The pool of talent that exists in the Manor House warehouse community also offers the potential to attract outside business to Haringey. At the start of the last decade, the large pool of creative talent that existed in Shoreditch attracted a number of leading tech firms to Tower Hamlets, specifically to the so-called "silicon roundabout". In the same way, a thousand-strong community of some of the most employable people in the capital would be a significant draw to the right kind of creative business, as the recent Site Allocations DPD acknowledges. We hope the Council agrees that New River Studios is one means by which this important economic cluster can be safeguarded in this new stage of our development.	Noted.
553	DM614	Ellis Gardiner on behalf of New River Studios CIC	Support cultural output	New River Studios is intended to meet this need. We run exhibitions, performances, workshops, youth programmes and a host of other activities for both warehouse residents and our local community	Noted.
553	DM615	Ellis Gardiner on behalf of New River Studios CIC	Vision	Our preferred outcome to this process would be that Haringey's planning policy for SA38 creates a framework within which the existing community can continue to evolve at the levels currently seen, and that any commercial uses that are introduced are of the kind that will complement the existing community. In our view, there is huge potential in the coexistence of residential, commercial and warehouse-living style accommodation in these estates.	It is agreed that there is potential for a mix of uses.

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553	DM616	Ellis Gardiner on behalf of New River Studios CIC	Warehouse community supports facility	Any reduction or removal of the residential community in SA38 would dramatically impact on the business activities of New River Studios, as well as a number of other businesses in similar circumstances. We chose to launch this venture specifically because of the residential community that had existed for many years and even though we are a not-for profit company, our future success still depends on its patronage.	Noted, the Council is seeking to create additional employment opportunities in this area.
554	DM617	Golnar Roshan, warehouse resident	Affordability	If these spaces were taken from us there would be no other affordable housing in London for us suitable for the work that we do.	Noted. Provision of affordable housing and workspace are important to the Council.
554	DM618	Golnar Roshan, warehouse resident	Cultural value	The creative communities of Tottenham and Seven Sisters add a huge amount of cultural value to the area	Noted.
554	DM619	Golnar Roshan, warehouse resident	Heritage	We are continuing the heritage of the site by using the spaces for our businesses in making furniture, art, designs, products, fashion and other creative industries.	Noted.
554	DM620	Golnar Roshan, warehouse resident	Management	With regard to the management and operation of the warehouse living spaces, we 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.	Noted, the management arrangement of the units is outside the scope of the plan.
554	DM621	Golnar Roshan, warehouse resident	Masterplanning	While we recognise and tentatively support the need for a masterplan approach on some sites to protect their character, and ensure that residents are living in safe and comfortable conditions. 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 improve living conditions where necessary.	Noted. The benefit of preparing masterplans is that the principles of the policy can be applied appropriately across the sites that make up the areas covered by this policy. The requirement for existing resident's needs to be assessed through any masterplan in the Policy.
554	DM622	Golnar Roshan, warehouse resident	Supports warehouse community	Please do not destroy one of the last remaining creative hubs in London. As a resident of the Warehouses in Fountayne road this is a very important and elemental space for us allowing us to live and work creatively as artists and designers. These homes and work spaces are a crucial and elemental part of our creative community and lives.	Support for retention of the existing community is noted.
555	DM623	Fabrizio Panella, warehouse resident	Against change to residential	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.	The regeneration area designation is the only one which can suitably deliver the Council's spatial vision in terms of retention of jobs, and housing. Furthermore, the deallocation from employment altogether would offer little protection to the existing users of the site from a purely residential development coming forward in the future.
555	DM624	Fabrizio Panella,	Economic benefit	As a resident of Fountayne Road, I am a member of the freelance community, made of creatives from all industries: graphic designer, set	Noted.

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		warehouse resident		<p>designer, product and food designer, photographers.</p> <p>We work and collaborate with top level clients, and have created an incredible network of freelance professional that can strongly impact and benefit the economy of the community around us.</p> <p>Some of the commissions include: Selfridges, House of Parliament, Alexander Mc Queen, Bentley, Krizia, Studio Toogood, London Fashion Week, Milan Fashion Week, Paris Fashion Week, Saatchi Gallery, Topshop, Central Saint Martins College of Art and Design.</p>	
555	DM625	Fabrizio Panella, warehouse resident	Masterplanning	<p>While we recognise and tentatively support the need for a masterplan approach on some sites to protect their character, and ensure that residents are living in safe and comfortable conditions. 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).</p>	Noted. The benefit of preparing masterplans is that the principles of the policy can be applied appropriately across the sites that make up the areas covered by this policy. The requirement for existing resident's needs to be assessed through any masterplan in the Policy.
555	DM626	Fabrizio Panella, warehouse resident	Supports warehouse community	<p>The incredible and rare variety of cultures and individuals that Tottenham and Haringey are made of is unique in the whole Europe. Especially looking at the warehouses near Seven Sisters and the Fountayne Road community, we can see examples of how creative communities can extremely benefit the area both on a economical, employment and cultural level.</p>	Support for retention of the existing community is noted.
556	DM627	Suzanne Creevey, warehouse resident	Affordability	<p>They provide affordable space to live and work in. Many artists and small business owners require room for their work. This is not something you find in standard spaces. If the warehouses were to be redeveloped etc it would strip much of the colour and community spirit from Haringey</p>	Noted. Provision of affordable housing and workspace are important to the Council
556	DM628	Suzanne Creevey, warehouse resident	Supports warehouse community	<p>As someone that lives and works in the area I believe that the warehouse community in Haringey should be supported by the council. So many prolific pieces of art have been created in these communities and we call it a community because it has an actual community spirit. This is sorely lacking in most of London. People who are involved in this community really care about Haringey. We want to make a positive difference but we wouldn't live here if it weren't for the warehouses</p>	Support for retention of the existing community is noted.
557	DM629	Jo Bee, warehouse resident	Retain existing buildings	<p>The site allocations stipulations, for my home of the last 6 years on Fountayne Road, 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 would prefer 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. We would like any plans for re-development to be considered in full partnership with the inhabitants of the sites</p>	The Council is required to meet objectively identified needs to create new housing and employment opportunities in the borough. There will therefore be some development required in order to meet these needs. It is considered that the appropriate provisions to protect and build on existing strengths within the area are contained within the policy.
557	DM630	Jo Bee, warehouse resident	Supports warehouse community	<p>Please consider that the warehouse communities in Haringey retain a subculture famous to London. It is not just the birth place of artistic expression and creative small businesses in the city, it is also where you will find soul and heart where many people from differing backgrounds can mesh successfully and connect.</p>	Support for retention of the existing community is noted.
557	DM631	Jo Bee, warehouse	Work with Council	<p>work with the residents... we are keen to listen and together we can continue to inspire this city</p>	Noted, it is agreed that collaboration between the Council and existing residents will be important to ensure a positive outcome

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		resident			for the area.
558	DM632	Roddy Skeaping, warehouse resident	Affordability	The (current) affordability makes it possible for people with less money to avail themselves of this life-style, helping to create a diverse and rich social mix.	Noted. Provision of affordable housing and workspace are important to the Council.
558	DM633	Roddy Skeaping, warehouse resident	Delivate balance of resi vs employment	I am personally very concerned that meddling with the naturally evolved balance between work and residential living - towards a decrease in business use - 'Work' against an increase in the residential - 'Live' element, will result in a Hackney Wick style self conscious 'Artisitic Ghetto' with the result that property values will increase dramatically over time, with disastrous effect upon the rich ecology of residential and business - Live/Work balance that has come about very naturally. I am also concerned that too much interference in the natural development of this vibrant community will stifle its capacity to continue to throw up new ways of putting communities together, which comes from its having a healthy degree of autonomy over its development	The Council notes that it is generally seeking to introduce more employment into the area, in the expectation that a sustainable mix of uses can be created in the area.
558	DM634	Roddy Skeaping, warehouse resident	Supports warehouse community	<p>Warehouse living is socially desirable and healthy, since it requires people to respect their neighbours (housemates in this situation).</p> <p>The work live ethic is healthy in that is ensures a mixed social ecology</p> <p>The work live ethic is healthy in that it creates opportunities and networking possibilities that encourage the development of new project and small businesses.</p> <p>The nature of this form of shared living demands that people come together to overcome all manner of social difficulties and learn tolerance in the process of evolving (for each individual warehouse community) a unique form of internal 'democracy' based on compromises between household members. This is extremely beneficial socially and is a form of alternative living that should be encouraged - especially in this area where an alarming number of almost 'gated communities' have been allowed to develop, though some of these, which affect our community are in the borough of Camden Council, which seems shameless and amoral about its development plans, unlike Haringey.</p> <p>In my experience, shared living helps greatly in promoting an awareness of social and ecological good manners and efficacy (e.g. waste disposal, noise pollution, general social responsibility etc.).</p> <p>In my experience of living here, LIFE STYLE CHOICE has consistently been the main reason for people from all walks of life choosing to live in this Warehouse community. People who live in this community value it on many levels and are prepared to defend it.</p>	Support for retention of the existing community is noted.
559	DM635	Tim Denman, local resident	Affordable housing	The warehouses provide an affordable home for people who may not be able to live in this area of London and contribute to maintaining Haringey as diverse and inclusive borough. Any change to the designation of the land would inevitably and regrettable undermine this	Noted. Provision of affordable housing and workspace are important to the Council.
559	DM636	Tim Denman, local resident	Management	Any problems faced by the area can be addressed with the participation of the current residents and landlords in a way that benefits the various stakeholders active on the site in a way that meets their mutual interests.	Noted, while the management arrangement of the units is outside the scope of the plan, resident involvement will be sought.
559	DM637	Tim Denman, local resident	Retain existing buildings	While there are some examples of residences which may need attention to make them more habitable, I feel that this should be the focus of any changes to the area and that this does not require a	The Council is required to meet objectively identified needs to create new housing and employment opportunities in the borough. There will therefore be some development required in

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				process of extensive redevelopment.	order to meet these needs. It is considered that the appropriate provisions to protect and build on existing strengths within the area are contained within the policy.
559	DM638	Tim Denman, local resident	Supports warehouse community	<p>I am writing to express my views regarding the future of the Manor House warehouses site and support for efforts of the Warehouse of Harringay Association of Residents and the residents of the Manor House warehouse more widely, of which I am one, in the current consultation with the Harringey council.</p> <p>I have been encouraged by the stance of the council reflected in the changes made to the Site Allocations Document and the Development Management policies since the last consultation in 2014, which reflect the important contribution of warehouse residents to the community. I strongly believe that not only is this a unique area of the capital that provides a home for many people and a is a community in it's own right, but that the contribution of residents who engage in various voluntary activities in the community, demonstrate a loyalty to local businesses and are well integrated within communities of south Tottenham, Harringay and Finsbury Park is significant and any change to the use of this land would sacrifice this valuable contribution</p>	Support for retention of the existing community is noted.
559	DM639	Tim Denman, local resident	The Slopes	I would also ask that the council give due consideration to the 'SINC' ecological corridor which runs behind Omega Works, the Crusader Industrial Estate and Arena in which the residents have invested significant time and energy to maintain as a biodiversity hotspot in north London. Any development on the site runs the risk of encroaching on and degrading this important site.	Noted, this ecological corridor will remain protected as a SINC.
560	DM640	Charlie Lewis, warehouse resident	Affordable business premises	Another problem for businesses in the area is the rising cost of rent, pushed upwards by the arrival of an apparently endless stream of people wanting to move to our community. Some of them have come on the basis of wanting genuinely to contribute and thrive but I acknowledge that others approach our road with the touristic mindset of wanting to live somewhere hip. To be fair, our community must be doing something right that we are so popular. On the other hand, we need to preserve the positive aspects of our community and improve on it, or else we will see the area turn into yet another area of unaffordable housing at a time when there are proposals for the quota of affordable housing to be reduced by 10%. I'm not sure that this will serve the area from an economic or community angle. It makes far more sense to build on the vibrant success story that is occurring here in Haringey rather than bury it.	Noted. Provision of affordable housing and workspace are important to the Council.
560	DM641	Charlie Lewis, warehouse resident	Against resi or industrial designation	In common with many of my colleagues and neighbours, I do not wish our warehouse community to become fully residential, nor do I perceive that returning the estate to a fully industrial model would be an effective move – it's perfectly clear to anyone who is familiar with what we do that creative workers are contributing far more to the area, economically and culturally, than the limited industrial use of the estate and derelict buildings which existed before our community came into being. And most of the successful industrial businesses in our estate have continued to flourish alongside our growing community.	The regeneration area designation is the only designation which can suitably deliver the Council's spatial vision in terms of retention of jobs, and housing. Furthermore, the deallocation from employment altogether would offer little protection to the existing users of the site from a purely residential development coming forward in the future.
560	DM642	Charlie Lewis, warehouse resident	Collaborative environment	Beyond the musical sphere, my own business is strongly supported by workers from other creative disciplines found in our community here on Fountayne Road – over the past two years, around 30% of my business has come from networking with other local media sector workers, in particularly video editors, film makers,	The Council notes that existing residents of the site wish to continue to have flexible, collaborative, round the clock, access to workspace as part of their living arrangement. This is supported in the policy.

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				theatre directors and other musicians.	
560	DM643	Charlie Lewis, warehouse resident	Pro some regularisation	Equally, I'm not lobbying for "no change". Rather, I would like to see our live/work arrangements fully legitimized, with appropriate alterations to the buildings to comply fully with regulations, and lawful contracts with our landlords that hold up to legal scrutiny. If the process is conducted properly, Fountayne Road and the other live/work areas in Haringey will retain their unique creative and collaborative atmosphere, whilst removing some of the less desirable elements, such as health and safety concerns and municipal issues including, for example, refuse collection	Noted.
560	DM644	Charlie Lewis, warehouse resident	Supports warehouse community	The varied and unusual spaces found in our converted warehouses allow for a huge variety of artistic and creative endeavours. Musicians are able to budget more profitably by sharing studio and rehearsal space, leading to more successful recordings and gigs. As a musician with nearly 20 years of professional experience, I am ideally placed to point out the local contribution to the British Music Industry. There are numerous DJs, electronic musicians and rock musicians from my road who work in scenes of which I am somewhat unfamiliar, and I can only talk directly from my own studio and stage experience over the past year.	Support for retention of the existing community is noted.
563	DM645	Rosha Fitzhowle, warehouse resident	Affordable housing	<p>I come from a working class family in Scotland, I work very hard in order to live in London. I can have up to three jobs at one time, just to make rent. Unfortunately many employers do not pay the London living wage and the minimum wage for living in London is not affordable. The prevalence of unpaid internships makes it difficult to break into a more professional sphere of work.</p> <p>People like me don't stand any chance of getting social housing and the private rental landscape in London is insane. Every year prices increase, whilst wages do not and it is harder and harder to stay near the center of London.</p> <p>People like me are at risk of falling through the housing gap, we can not afford to live where we want and do not qualify for social housing. This forces people to live in cramped conditions and under sometimes less than legal arrangements.</p> <p>The warehouse community provided a long sought after relief for me. Although it is not dirt cheap, it is not extortionate when compared with other housing in the area. It is relatively affordable, especially compared with the wider privately rented spaces in London.</p> <p>By changing the way that our land is used and therefore making us move. You would be actually adding to the problem that London is experiencing of social cleansing. London is steadily becoming void of creativity and artists, as we are forced further and further out. London is becoming a clean and oiled playground for the wealthy.</p>	Noted. Provision of affordable housing and workspace are important to the Council
563	DM646	Rosha Fitzhowle, warehouse resident	Agents	This alternative way of living cuts out agents, which London and England in general has a problem with, going unregulated. They can and do charge exorbitant fees and rip people off, treating them very badly. I myself have had first hand experience of this. We have landlords who care and do things for us.	Noted, this issue is outside of the scope of the Plan.
563	DM647	Rosha Fitzhowle,	New River	I am fully on board with the council re-purposing the south bank of New River as a community space. We could create an allotment area where	Support is noted.

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		warehouse resident		the community can grow their own food. This has been done to success in other boroughs and has helped to educate and bring together communities.	
563	DM648	Rosha Fitzhowle, warehouse resident	Objects to redev	Objects to redevelopment	Objection noted.
563	DM649	Rosha Fitzhowle, warehouse resident	Pro cycling	The reason that is it so important to me to be fairly close to the center is because I only cycle as a mode of transport, as do many others living in the warehouses. We need to be able to cycle to work. And by doing this we are cutting down, in a small and personal, but by no means unimportant way, on carbon emission and keeping personal costs down.	Noted, cycling is supported in the Plan.
563	DM650	Rosha Fitzhowle, warehouse resident	Supports warehouse community	<p>I and others who I live with in the warehouses value community, we want to further develop ties with the wider Haringey community. I know that there is already outreach work being done and by moving us you would end that. The arts receives less and less funding and opportunities for those from lower income backgrounds to have access are decreasing. I know in your report that you say that this area is one of the most deprived, studies have shown that in areas of deprivation culture is one the first things to be cut. However when it is introduced, art and music making has transformative properties. It can really fuse a community, give joy and purpose to people.</p> <p>The live-work space that we have in the warehouses creates the climate of art making. We can and will contribute to the wider community through our art. The live-work lifestyle is unique and wonderful, creating jobs and more for the community and Haringay and London.</p> <p>London and the UK more broadly needs more affordable housing, however it would be a mistake to destroy some that already exists to create it differently. Please don't try and fix one problem, but at the expense of another community, to create another.</p>	Support for retention of the existing community is noted.
579	DM651	Laura Harrison, resident	Warehouse living as a general development concept	These unconventional life-work spaces, characterized by large private units surrounding large shared living spaces, could also provide a good model to consider when designing new housing options. This type of accommodation, supplemented by low-cost spaces for start-up businesses, and maker-spaces to support small volume manufacturing enterprise and teach new skills, could help to rejuvenate Tottenham as a whole, and revive a reputation for creativity and manufacturing. The industrial buildings around Ashley Road provide a good opportunity to create further similar communities.	Noted. The Local Plan seeks to meet objectively identified housing and employment needs through facilitating delivery of a range of accommodation options.
602	DM652	Jay Jaye, warehouse resident	Against residential allocation	I applaud noticeable shift in the Haringey Council's recognition of the warehouse community, and it's contribution to the wider South Tottenham community, since the last consultation in 2014. I think it is important that the area remain classified as a live/work area rather than changed to a strictly residential one, in order to continue to provide affordable accommodations for artists and creatives. A change to residential status would bring with it a price rise that would be unaffordable for the current residents.	The RA designation is the only designation which can suitably deliver the Council's spatial vision in terms of retention of jobs, and housing. Furthermore, the deallocation from employment altogether would offer little protection to the existing users of the site from a purely residential development coming forward in the future.
602	DM653	Jay Jaye, warehouse	Innovative management	I would definitely favour a resident controlled, not-for-profit co-operative management model for more of the units across the sites so that the	Noted, the management arrangement of the units is outside the scope of the plan.

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		resident	structure	needs of the residents and the management are more in line with each other. This would also keep rents under control.	
602	DM654	Jay Jaye, warehouse resident	New River	In addition, the re-purposing of the south bank of the New River to create a community asset seems like a very positive move. I would support the development of the land into a community allotment garden which could be used for teaching the wider community about horticulture and organic farming.	Support is noted.
602	DM655	Jay Jaye, warehouse resident	Problems with current management	It's difficult to live with constant threat of redevelopment hanging over our heads. The residents are currently discouraged from reporting any infringements of their rights by unscrupulous landlords, or problems with the maintenance, health and safety aspects of the dwellings for fear that it will be used against them in the plans to redevelop the site.	Noted, however management arrangements of the units is outside the scope of the plan.
602	DM656	Jay Jaye, warehouse resident	Retain current/ smaller unit sizes	In addition, the site allocation stipulations seem to favour large scale redevelopment which would take away the unique character of the area. I would definitely prefer the current buildings to remain intact and that any redevelopment be done in full partnership with the current residents of the sites.	The Council is required to meet objectively identified needs to create new housing and employment opportunities in the borough. There will therefore be some development required in order to meet these needs. It is considered that the appropriate provisions to protect and build on existing strengths within the area are contained within the policy.
686	DM657	Thomas Fletcher	Affordable business space	I run a small ethical juice company that saves 100's of tons of food every year from landfill, provides affordable healthy food for people that could not otherwise get access to this quality of produce and employ homeless and disadvantaged people at the same time. This all would not have been possible if there was not cheap warehouses where I could build a kitchen on a budget and get myself going.	Noted. Provision of affordable housing and workspace are important to the Council
687	DM658	Kate Stamp, warehouse resident	Supports Warehouse community	I run workshops from mine for Tottenham youth so we can inspire creativity with them. It would be devastating if we had to leave, we are such a big part of Tottenham and make it even richer in culture	Support for retention of the existing community is noted.
687	DM659	Kate Stamp, warehouse resident	Working with Council	Hi there, I am writing to you for more information and to ask if we (the warehouse folk) can work with the council so we can keep the creative hub that is the warehouses and the art that comes out of them.	Noted, it is agreed that collaboration between the Council and existing residents will be important to ensure a positive outcome for the area.
688	DM660	Tess Woodward, warehouse resident (out of the borough)	Supports Warehouse community	I am really upset to hear about the warehouse agenda. I myself live in a warehouse and feel it is an amazing space for creative people to meet and collaborate. I have thrived in this environment and found people to help me film speculative projects to assist in my career as a scriptwriter. They are vibrant communities where people support each other and network. Creative industries thrive because of these warehouse projects. I do not live in your area but in another group of warehouses but feel very passionate about the continuation of warehouse communities.	Support for retention of the existing community is noted.
689	DM661	Chris Macmeikan, Continental Drifts	Supports Warehouse community	We urge you to "re think " the plans for Transforming these important communities Im the Director of one of the Boroughs largest Cultural Organisations Continental Drifts, being based in the Tottenham Hale area we actually utilise many of the artists in the Fontayne and Manor House areas, Having been a part of the regeneration culturally of many of the now	Support for retention of the existing community is noted.

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				<p>booming parts of London over the years , the almost inevitable destruction of the artistic communities that have played a major role in pioneering the area , are ALWAYS the first to be moved on, controlled and often forced out.</p> <p>My understanding of the LBH cultural strategy was that areas like this were to be fully recognised and supported , now in the greater picture of London , this area is one of the last Islands of mass cultural industry left !.</p> <p>We certainly can prove that economically they have played and continue to be a part of the entertainment we need to use and rely on in a city where such artists are being forced to leave in ever large droves. The loss of studio and creative spaces to new zoning and development is driving this loss , these areas are not limitless , these are the last such spaces inside of the North Circular .</p> <p>Tottenham Hale is reaching a pinnacle driven by clever regeneration and development but its really requires a cultural kicking heart and soul to become the destination venue that it really could be,</p> <p>As a local cultural business and a citizen, it would be incredible if there was a Local Authority who could spot this and protect some of the very spaces which in the long run benefit the whole area massively</p>	
690	DM662	Natalie Cherry, warehouse resident	Supports Warehouse community	<p>I have lived in two warehouses and through my time there expanded my network of creative friends into the hundreds. I have had about 80 housemates in my lifetime. These relationships are utterly invaluable for gathering together people to work on all sorts of projects from fashion shows to filmmaking, sound design and animation to bands and music videos to tech startups ... real, valuable projects which gain traction and make money and sell! It's all here, and it's all growing out of this fantastic melting pot of passion and enthusiasm. You don't get this anywhere else in London. There are individuals living in tiny flats where they don't have the space to really make and be who they want to, or can't decorate the walls or hang apparatus around because of strict landlords. In the warehouses, you can build what you need. Warehouse space is like wings to a creative individual, but it's not just space that allows us to flourish: it's being surrounded by other like-minded individuals, all of the time.</p> <p>Every talent and skill should be nurtured and celebrated, and they really are within the relaxed and informal communities who live and work in these converted spaces. I'm asking you, the council, to recognise it and work with us to continue to create and thrive and evolve.</p> <p>The people living and working in these spaces are all of them hard-working citizens who earn their way, pay their rents and taxes, and contribute positively to their community all whilst doing work they love and spending leisure time with respected peers who appreciate them and their work. How many other social communities can you say all of those things about?</p>	Support for retention of the existing community is noted.
691	DM663	Joseph Harvey, warehouse	Supports Warehouse community	<p>The warehouse community is a vibrant and creative place that gave me a transition into London as a 23 year old graduate.</p>	Support for retention of the existing community is noted.

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		resident		<p>There is good news for the digital economy in London through what young creatives like myself have driven..... The majority of which live in the outskirts developments like this one...</p> <p>I understand laws and obligations, but, look this is a culturally rich part of London.</p> <p>Please consider what your actions will do</p>	
692	DM664	Atticus Pappin, warehouse resident	Supports Warehouse community	<p>fountain road is the greatest road in london. It is so special to me and so many people. it not only brings vibrant atmosphere to tottenham but to the whole of London. before you get rid of the warehouse community why dont you come and see for yourself what a special community it is</p>	Support for retention of the existing community is noted.
693	DM665	Rebecca Parkin, warehouse occupant (business)	Affordable workspace	<p>I am writing with regards to future proposals of development in the Fountayne Road area. It has only been brought to my attention today via word of mouth that proposals which may greatly affect the future of my workshop are being discussed. I have little knowledge as to the details of this and I am greatly concerned as to how this will impact my future. I rent a workshop at 7 Fountayne Road which I have divided into three artists studios. As I am sure you are aware affordable studio/workshop space for designer's / artist's just setting out in business is in limited supply in london. I have put a great deal of time and effort into my workshop and it is a valuable asset for this time in my career and for those designers and artists sharing with me. I am using my studio space to further my career as a fine artist and also to undertake commercial pieces of work for events, backdrops for tv etc. we are all registered self employed.</p>	Noted. Provision of affordable housing and workspace are important to the Council.
818	DM666	Our Tottenham	Warehouse living	<p>DM51 should be reconsidered in order to consider the risk that the policy destroys rather than protects the live-work uses in the area by facilitating new development which displaces existing residents and workers. The policy should be developed in collaboration with those who live and work in the relevant areas to ensure this is not the case.</p>	It is considered that the policy sets out a balanced position, with a considerable emphasis on meeting the needs of the existing community. The policy seeks to regularise uses in the area.

Comments on DM52 of the Local Plan: Development Management Policies Regulation 18 consultation Feb-Mar 2015

Respondent ID	Comment ID	Respondent	Topic	Summary of Response	Council Response
400	DM667	Ms J Hancher	Objection	This paragraph should be re-worded to only resist the loss of designated employment floor space.	Disagree. The Council considers that non-designated employment floorspace makes an important contribution to the local economy and can play a role in helping the borough meet its job target; therefore any loss should be carefully managed.
430	DM668	Derek Horne & Associates for Majorlink Ltd	Rewording	This paragraph should be re-worded to only resist the loss of designated employment floor space.	Disagree. The Council considers that non-designated employment floorspace makes an important contribution to the local economy and can play a role in helping the borough meet its job target; therefore any loss should be carefully managed.
564	DM669	Savills on behalf of Archway Apartments		We would note that these policies should ensure consistency with paragraph 22 of the NPPF, which seeks to avoid the long term protection of sites for employment use where there is no reasonable prospect of a site being used for that purpose. Similarly, paragraph 5.1.4 of the LBH Local Plan states that the Council will take a more flexible approach where local employment areas are no longer suitable for industrial or other employment generating uses, and a progressive	Flexibility regarding the development for non- employment generating uses on non-designated employment sites is set out in draft policy DM52. The Council considers that the principle of safeguarding employment uses on non-designated employment sites is sound, particularly given the relative land values of employment and residential uses in the borough. Where developments on non-designated employment sites are able to

				<p>release of surplus industrial land will be carried out, in order to facilitate urban regeneration. We therefore consider that emerging Policy DM48 should be revised to acknowledge that site specific circumstances and the viability of retaining land for employment uses should be reviewed when considering whether land should be retained for employment uses.</p> <p>In particular, we consider that the requirements of Policy DM52(b) are unduly onerous and should be revised to reduce the minimum marketing period. The requirement to undertake marketing for a continuous period of three years will significantly delay the delivery of redevelopment within the borough on sites which are demonstrably no longer suitable for employment uses. As such, it will also delay the delivery of regeneration benefits, including the provision of affordable housing, that could be provided on these sites.</p> <p>We also consider that emerging Policies DM49 and DM52 do not offer sufficient recognition to the employment benefits of uses which do not fall within Class B uses. Employment opportunities can be provided through a wide mix of non-residential uses, other than Class B uses, and retail, leisure, and community uses can also provide significant employment benefits, in addition to promoting economic activity. We consider that these uses should be encouraged within the borough and their ability to deliver employment opportunities should be acknowledged within the emerging policy.</p>	<p>help meet the Council's regeneration objectives and spatial vision for the borough, they will be considered on a site-by-site basis, applying the principles set out in DM52. The release of non-designated employment land will be monitored and managed to ensure a sufficient stock is retained in the borough.</p> <p>Action: Delete DM48 part B, but ensure provision for management of non-designated employment sites is included in DM52.</p> <p>The tests set out in current policy EMP4 with regards marketing are similar to those included in DM52. The Council considers the vacancy and marketing requirement for non-designated sites to be appropriate and in line with industrial land release criteria set out in the Mayor's Land for Industry and Transport Supplementary Planning Guidance.</p>
566	DM670	Capita on behalf of Capital & Regional plc	Overly Onerous	The draft policy is excessively onerous with regard to the requirement for a marketing campaign covering a minimum continuous period of three years in order to justify a change to a non-employment use, having first considered the potential for a community use. This approach does not sit comfortably with the policies of the National planning Policy Framework (Para 22).	The tests set out in current policy EMP4 with regards marketing are similar to those included in DM52. The Council considers the vacancy and marketing requirement for both designated and non-designated sites to be appropriate and in line with industrial land release criteria set out in the Mayor's Land for Industry and Transport Supplementary Planning Guidance.
584	DM671	Rapleys on behalf of Lasalle Investment Management, long leaseholders	Further detail needed	The wording of the policy suggests that sites allocated for mixed use redevelopment (including employment generating uses) which involve the demolition of existing employment floorspace may be required to satisfy all of the criteria to justify the loss of existing employment floorspace to alternative employment generating uses. As the definition of employment uses referred to in this policy is not defined in the policy, we reserve our right to comment further on this policy, once the "employment uses" to which this policy refers are defined.	The acceptable range of uses for designated employment areas is set out in policy SP8. The Council will assess whether a use is "employment generating" on a case by case basis.
609	DM672	Apcar Smith Planning on behalf of Wedge Investments Ltd	Residential use	There should be an additional criterion that should refer to the site being suitable for a mixed use development incorporating residential development in appropriate locations.	This is already included in draft Policy DM50, Part A.
616	DM673	CgMs on behalf of Parkstock Ltd	Overly restrictive	<p>The suggested criteria against which the loss of employment floorspace will be considered includes documented evidence of an unsuccessful marketing campaign over a period of 3 years.</p> <p>It is considered that a marketing period of 3 years is overly restrictive and does not allow sufficient flexibility to respond to particular circumstances or site characteristics. A blanket marketing period of 3 years before alternative uses are permitted will go further to hamper</p>	<p>The tests set out in current policy EMP4 with regards marketing are similar to those included in DM52. The Council considers the vacancy and marketing requirement for both designated and non-designated sites to be appropriate and in line with industrial land release criteria set out in the Mayor's Land for Industry and Transport Supplementary Planning Guidance.</p> <p>Action: Amend DM52 to require non-designated</p>

				<p>development.</p> <p>It is recommended that the policy is revised to allow marketing requirements to be agreed with the Council on a site by site basis once the nature of the site and specific issues are fully understood during pre-application discussions.</p>	<p>employment sites to be proven to have been vacant, and marketed, including provision of evidence of marketing, before granting permission for a change of use.</p>
661	DM674	Tottenham Business Group	NPPF compliance	<p>Strategic Policy (DM52) as expressed in paragraph 5.26 is not in line with the NPPF guidelines, which states employment land, should not be protected where there is NO PROSPECT of it being used.</p> <p>Political pledges made during initial consultations on the Regeneration promised to improve local employment and provide more opportunities for youth training and apprenticeships. This has not been followed through in Policy DM57 but abandoned with the Council merely seeking contributions to facilitate local employment and training</p> <p>Many small shops, businesses and affordable industrial workspace will be displaced in regard to High Road West and yet there is nothing in this document that addresses that scenario.</p> <p>There is no vision for the economic future</p>	<p>The policy as written provides an approach to managing the renewal of redundant employment land, in line with the NPPF and the London Plan.</p> <p>With regards DM57, the Council considers that it is important to gain contributions from developers, where there is a loss of employment floorspace, towards enabling local residents to access the jobs in the local and wider regional economy.</p>
666	DM675	Federation of Small Businesses	Risk to local businesses	<p>We are particularly concerned that this development will make it far more difficult for the current small businesses operating within Tottenham, independent traders of long-standing which form an intrinsic part of the local community, to continue to operate in the future of at least be given a guarantee of remaining in their current workplace if rents increase dramatically. A similar situation is occurring with the regeneration under Brixton arches by Network Rail. We want Tottenham to be a leader on this vitally important issue to the local community – gentrification must not come at the expense of independent local businesses. We call for traders to be guaranteed an offer of equal, or at the very least, fair rental costs.</p> <p>Small businesses are not simply part of the local economy, they are the local economy. For every £1 spent in local small businesses, 63 pence remains within the local economy compared to only 40 pence if spent within large businesses.</p>	<p>Placing control on existing rents is not within the scope of the Local Plan. Through DM50, efforts will be made to place a restriction on the price of newly-developed employment floorspace to help enable small businesses to grow in Haringey. The policy as written seeks to manage the loss of employment floorspace, to ensure that there is a sufficient stock of employment land for business growth in the local economy.</p>
694	DM676	Iceniprojects on behalf of Berkeley Homes	NPPF consistency	<p>Object to two elements of this draft policy B and C. The draft Policy is unsound, as it is unjustified and is not consistent with national policy. Draft Policy DM52b) – there is no evidence to suggest why a three year marketing campaign is required. It is typical in other London boroughs to exercise periods of 12months. Paragraph 22 resists the long term protection of sites, where there is no reasonable prospect of the site being used for that purpose, having consideration to market signals and relative need for different land uses.</p> <p>Draft Policy DM52c) should remove reference to ‘as part of a strategically coordinated regeneration scheme or programme’. This infers that the site should be allocated to even be considered for loss of employment. This should not be the case. As emphasised in the housing policies above, windfall sites will help to the borough to meet and exceed its challenging housing delivery targets. An onerous policy requirement such as this would predicate any redundant employment</p>	<p>The tests set out in current policy EMP4 with regards marketing are similar to those included in DM52. The Council considers the vacancy and marketing requirement for non-designated sites to be appropriate and in line with industrial land release criteria set out in the Mayor’s Land for Industry and Transport Supplementary Planning Guidance.</p> <p>Action: Remove DM52.c and policy point which provides release of land as part of strategically coordinated regeneration scheme or programme.</p>

				windfall site being brought forward for housing.	
818	DM677	Our Tottenham	Employment land	Policy DM52 is not sound. There is strong demand for employment space in London, and the evidence base for Haringey suggests strong demand for its own supply, as discussed above. Employment sites which are experiencing problems should be supported and improved rather than given over to housing uses. We are concerned that owners and investors may use the bullet points under point A to justify the redevelopment of employment land for other uses even where it is perfectly well used and occupied e.g. by not renewing leases; only offering short leases; not investing in their buildings; not advertising spaces effectively etc. Much clearer statements should be included that this policy will not apply to existing, occupied, in use sites.	Local evidence has identified a future need for additional employment floorspace. The Local Plan therefore seeks to safeguard for both designated and non-designated employment land and floorspace. The NPPF states that the Council should avoid the protection of sites where there is no reasonable prospect of the site being used for that purpose. The policy is considered to be sufficiently rigorous to ensure protection of employment land whilst remaining consistent with national policy. The release of non-designated employment land will be monitored and managed to ensure a sufficient stock is retained in the borough.
818	DM678	Our Tottenham	Employment land	Para 5.26 suggests a misunderstanding of the NPPF. The issue is not that employment land cannot be protected where there is no prospect of <i>development</i> coming forward, but that it cannot be protected where there is no prospect of it being <i>in use</i> . Again, this suggests a dominance of developers perspectives rather than users perspectives in thinking about the employment land policies.	Noted.

Comments on DM53 of the Local Plan: Development Management Policies Regulation 18 consultation Feb-Mar 2015

Respondent ID	Comment ID	Respondent	Topic	Summary of Response	Council Response
258	DM679	Ladder Community Safety Partnership	Town centre	Support for town centre policies which priorities retention of A1 at floor level. Disappointed existing UDP policies weakened by omission of two key provisions “ <i>that the change of use [from A1] does not result in a significant break, normally 3 frontages, in the continuity of retail frontage and, individually or cumulatively the proposed use does not have an adverse effect on the vitality, viability or predominately retail function of the centre</i> ” (UDP / TCR 3b/c). Removal of these weakens case for retention and should be reinstated.	Support for policy is welcomed. The policy will be revised with criteria to ensure continuity of retail frontage. Action: Additional criteria to ensure continuity of retail frontage.
566	DM680	Capita on behalf of Capital & Regional plc	Inflexible	In principle, C&R support the protection of A1 uses in the town centre. However, the policy does not provide sufficient flexibility to enable a destination such as The Mall to respond to the ever changing retail environment. The growth of online retailing and competition from higher order destinations require a speed of response that this policy would not provide. The effect of the two year vacancy period does not, in practice, protect key retail uses. The effect is to bring forward short-term, low value retail uses that detract from the overall quality of the shopping centre and the user experience. Uses such as restaurants, cafes and banks serve to support the retail function of the shopping centre, providing uses that encourage shared trips and support the long-term health of the town centre. This has been a particular trend over the preceding five years as town centres struggle to adapt to the changing face of retail and particularly the competition from online retailers. The policy needs to recognise the wider value of non-retail uses in supporting the primary retail function by providing the flexibility required to meet changing markets. The Government’s Planning Practice Guidance document recognises the economic drivers that influence town centre uses and requires local planning authorities to have regard to them. As currently drafted the policy lacks the flexibility required to respond to these ‘market signals’, to the potential detriment of The Mall’s longer	Noted. The Council considers that the proposed approach for managing town centre uses is sufficiently flexible to support town centre vitality and viability, allowing opportunities for a range of complementary town centre uses whilst ensuring a necessary retail core. However, taking account of this consultation response the town centre policies will be amended to set a framework which is more responsive to market signals, particularly where there is evidence of long term vacancies. Action: Additional policy criteria on managing town centre uses where there is evidence of long-term vacancy rates that threaten town centre vitality and viability. New policy point to support meanwhile uses in vacant shops.

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				term health. The policy needs to respond more quickly and flexibly to changes in consumer behaviour, such as the recent demand for A3 uses in town centres. The emphasis of the policy should perhaps be amended to facilitate changes between A class uses.	
582	DM681	David Freake local resident	Additional TCR4 note	<p>Just wanted to make a quick comment regarding the proposed new policy DM53 B regarding local shopping centres within the Development Management Policies. I am pleased that there is a requirement to provide robust evidence around marketing of an empty shop. But TCR4 in the saved UDP policies additionally stated in regard to possible change of use from A1 that</p> <p>"b) individually or cumulatively the proposed use does not have an adverse affect on the vitality, viability or where appropriate predominant retail function..."</p> <p>I believe that there should be something similar in DM53 B to consider the impact of change of use on the surrounding area</p>	<p>Noted. The policy will be revised to ensure appropriate consideration of impact on retail function of town centre, including continuity of retail frontage.</p> <p>Action: Additional criteria to ensure appropriate consideration of impact on retail function of town centre, including continuity of retail frontage.</p>
593	DM682	John Crompton, local resident	Too onerous	A, B and C The intention may be good, but is it really necessary for a shop to have been vacant for up to 24 months. Wouldn't a better test be to say that the business has been marketed for 24 months?	The test for vacancy should be that the premises have been both vacant and unsuccessfully marketed, and proof that the marketing has been undertaken in a suitable manner at a price that is competitive with surrounding uses.
593	DM683	John Crompton, local resident	Support policy	Support para 5.34	Support is noted.
607	DM684	Muswell Hill & Fortis Green Association	Supports Policy	In particular Para 5.34 Re residential uses at ground floor level breaking frontages in district centres.	Support is noted.
694	DM685	Iceniprojects on behalf of Berkeley Homes	Support with tweak	Suggest that the policy aim is tweaked to consider the important supporting role housing can play in sustaining vibrant and vital town centres, in light of changing shopping habits, references Outer London Commission third report and Experian consumer expenditure report.	<p>Noted. The Council agrees that adding residential into town centres can help to provide demand for town centre uses, and encourage investment. Residential development will not be permitted on designated frontages however. The Council agrees that the Local Plan should provide further clarification on this matter and a new policy on maximising the use of town centre land and floorspace will be included.</p> <p>Action: New policy on maximising the use of town centre land and floorspace, including scope for mixed development.</p>
729	DM686	Father Simon Morris, St Mary's Vicarage	Betting shops; Fast food	I welcome the restrictions on betting shops and those mentioned on fast food outlets, both of which are too relevant in Tottenham and benefit our community little.	Noted.
818	DM687	Our Tottenham	Town centres	Policy DM53 re: town centres does not detail the Council's approach to permitted development in terms of conversion of office to housing – how will this be managed to ensure it does not undermine high streets and town centres? The protections to limit conversion of retail to housing do not go far enough.	Noted. Permitted Development is outside the scope of the Local Plan.

Comments on DM54 of the Local Plan: Development Management Policies Regulation 18 consultation Feb-Mar 2015

Respondent ID	Comment ID	Respondent	Topic	Summary of Response	Council Response
729	DM688	Father Simon Morris, St Mary's Vicarage	Betting shops; Fast food	I welcome the restrictions on betting shops and those mentioned on fast food outlets, both of which are too relevant in Tottenham and benefit our community little.	Support for policy is noted.

Comments on DM55 of the Local Plan: Development Management Policies Regulation 18 consultation Feb-Mar 2015

Respondent ID	Comment ID	Respondent	Topic	Summary of Response	Council Response
258	DM689	Ladder Community Safety Partnership	Betting shops	LCSP welcomes any proposal to preventing clustering and oversupply of betting shops. Suggested 5% threshold may be a double edged sword. It allows for large numbers of betting shops in a small area i.e. of 165 primary frontages in Green Lanes this could be 8 betting shops. GL already has 8 so although won't reduce may prevent anymore. It may however facilitate a growth in other areas of the borough. Are AGCs included in the 5%?	Noted. The policy will be considered in conjunction with other policies which manage uses on designated primary and secondary shopping frontages. The policy does not promote but seeks to control the overconcentration of these uses. Adult gaming centres fall under the sui generis use class and proposals will be considered on a case by case basis having regard to other town centre policies.
259	DM690	Archdeacon of Hampstead Fr Luke Miller	Betting shops	It is good to see the limitations proposed on betting shops and it is hoped that these will be as strong as the law permits. It would be good if the Council could equally promote beneficial uses such as premises for Credit Unions.	Support for policy is noted. Noted. The town centre policies manage the range of acceptable uses within town centres.
408	DM691	Mario Petrou	Betting Shops	The 5% limit for betting shops within certain centres should be reduced to 2%	There is no evidence to support this arbitrary change in policy.
589	DM692	Anonymous	Supports policy	Stop all Betting Shop clusters, poor men/women losing the little they have got, and it attracts unsavoury characters	Support for policy is noted.
593	DM693	John Crompton, local resident	Widen policy	Betting shops –no objection to it being here but isn't this all too late –ie. Is there still a pressure to open more of them? What about widening the wording so it could apply to other premises the Council may wish to restrict such as those mainly selling legal highs.	Noted. The town centre policies manage the range of acceptable uses within town centres.
597	DM694	Mary White, local resident	Support Policies	I also strongly support the proposals regarding DM 55 Betting Shops as these can be a blight on neighbourhoods. Our recent experience of enormous local opposition to the Paddy Power takeover of the former Lordship Public House which could not be prevented because of the 2005 Gaming Act, means that any restriction on the proliferation of these shops would be very welcome.	Support for policy is noted.

Comments on DM56 of the Local Plan: Development Management Policies Regulation 18 consultation Feb-Mar 2015

Respondent ID	Comment ID	Respondent	Topic	Summary of Response	Council Response
258	DM695	Ladder Community Safety Partnership	Hot food takeaways	Welcomes emergence of policies on hot food takeaway which weren't in UDP to promote healthy communities and tackle obesity.	Support is noted.

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511	DM696	SSA Planning on behalf of KFC GB Ltd	400m Radius too simple	Further difficulty of using simple distance radii as shown in Map 5.1 is that it takes no account of real barriers, either physical or perceptual, so that premises on the other side of a line feature such as a canal or busy road	Noted. It is considered that the 400m represents a minimum of a 5-minute walk.
511	DM697	SSA Planning on behalf of KFC GB Ltd	A5 use class too vague	Some hot food takeaways, together with restaurants, pubs and shops are clearly a source of cheap, energy dense and nutrient poor foods; however, not all hot food takeaways, restaurants, pubs and shops are, and the planning system is ineffective in distinguishing between those that are and those that are not.	Noted. The policy is informed by the evidence base linking the location of hot food takeaways and health indicators. The policy seeks to control development of unhealthy hot food takeaways and applies the Use Class Order as a means to set a clear framework for policy implementation.
511	DM698	SSA Planning on behalf of KFC GB Ltd	Definition of unhealthy food	Using the concept of 'unhealthy food', is at best unhelpful in isolation from an understanding of the person eating the food	Noted. It is recognised that there are a number of factors that influence eating behaviours. The policy is informed by the evidence base linking the location of hot food takeaways and health indicators.
511	DM699	SSA Planning on behalf of KFC GB Ltd	Implications of policy	Economic or environmental impacts of banning hot food takeaways from large parts of the borough not suitably appraised.	Social, environmental and economic impacts of the Local Plan policies are considered through the Sustainability Appraisal process.
511	DM700	SSA Planning on behalf of KFC GB Ltd	Lack of evidence	There is no objective evidence for any link between the incidence of obesity and the proximity of hot food takeaways to schools, so it is at best unclear whether refusing planning applications for hot food takeaways on the basis suggested could ever have an effect on the incidence of obesity, childhood or adult, near schools or elsewhere	The Public Health Directorate has published a Health Evidence Base (2012) to inform preparation of Haringey's Local Plan. This highlights the link between health outcomes and the proximity of hot food takeaways. Action: Update supporting text to refer relevant technical evidence.
511	DM701	SSA Planning on behalf of KFC GB Ltd	Not appropriately justified	The text at paragraphs 5.41 – 5.49 nor the evidence base support zonal restrictions on food and drink uses	The Public Health Directorate has published a Health Evidence Base (2012) to inform preparation of Haringey's Local Plan. This highlights the link between health outcomes and the proximity of hot food takeaways Action: Update supporting text to refer relevant technical evidence.
511	DM702	SSA Planning on behalf of KFC GB Ltd	Not justified	The only evidence referred to specific to the draft policy appears to be a Government Office for Science Report from 2007 that simply observes that diet is a key determinant of obesity levels. It does not make a spatial link between the incidence of obesity and the proximity of hot food takeaways to schools or indeed any other locations.	The Public Health Directorate has published a Health Evidence Base (2012) to inform preparation of Haringey's Local Plan. This highlights the link between health outcomes and the proximity of hot food takeaways. Action: Update supporting text to refer relevant technical evidence.
511	DM703	SSA Planning on behalf of KFC GB Ltd	Not positively prepared policy	evidence of either a link between the incidence of childhood obesity and the proximity of hot food takeaways to schools or of any particular distance at which that link is demonstrated	The Public Health Directorate has published a Health Evidence Base (2012) to inform preparation of Haringey's Local Plan. This highlights the link between health outcomes and the proximity of hot food takeaways. Action: Update supporting text to refer relevant technical evidence.
511	DM704	SSA Planning on behalf of KFC GB Ltd	NPPF Compliance	Because the NPPF doesn't deal with dietary issues, preparing a policy on this subject isn't in line with sub-section 19(2)(a) of the Planning & Compulsory Purchase Act 2004.	NPPF paragraph 7 clearly sets out the three dimensions of sustainable development that the planning system has a role in addressing. This includes a social role of supporting strong, vibrant and healthy communities. The Council considers the policy is consistent with the NPPF.
511	DM705	SSA Planning on behalf of KFC GB Ltd	NPPF Compliance	Taking into account the proximity of hot food takeaways to schools or indeed any other type of facility has no basis in national policy	NPPF paragraph 7 clearly sets out the three dimensions of sustainable development that the planning system has a role in addressing. This includes a social role of supporting strong,

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					vibrant and healthy communities. The Council considers the policy is consistent with the NPPF.
511	DM706	SSA Planning on behalf of KFC GB Ltd	Primary schools not pertinent	Children at primary schools are not usually permitted to leave the premises at lunchtime and, given their age, are unlikely to travel to or from school unaccompanied. Planning Appeal granted : (APP/P4415/A/11/2159082)	Noted.
511	DM707	SSA Planning on behalf of KFC GB Ltd	Regulatory compliance	Do not consider a reasoned justification for the draft policy has been substantially provided in accordance with regulation 8 (2) of The Town and Country Planning (Local Planning) (England) Regulations 2012	The Public Health Directorate has published a Health Evidence Base (2012) to inform preparation of Haringey's Local Plan. This highlights the link between health outcomes and the proximity of hot food takeaways. Action: Update supporting text to refer relevant technical evidence.
511	DM708	SSA Planning on behalf of KFC GB Ltd	Requested change	The amendment sought by KFC (GB) Limited, and the only change to the LP DMP-PO that would render it sound, is deletion of Part (A) entirely, and, from Part (B), the text "only" and "outside of the exclusion zone" and the criteria (b) and (c). It may be that the criteria are sound, but evidence is needed for the particular figures used	The Public Health Directorate has published a Health Evidence Base (2012) to inform preparation of Haringey's Local Plan. This highlights the link between health outcomes and the proximity of hot food takeaways. The Council is aware of several examples of similar policies being found elsewhere in London. Action: Update supporting text to refer relevant technical evidence.
511	DM709	SSA Planning on behalf of KFC GB Ltd	Support for open space improvement	Focussing on improving access to open space, sport and recreation facilities would be a far more appropriate strategy for reducing childhood obesity	Noted. There are other policies in the Local Plans that support these objectives.
511	DM710	SSA Planning on behalf of KFC GB Ltd	Supports diverse retail mix	Consider high concentrations of any one type of use are unhealthy in retail health terms	It is considered that there is ample scope for variance of high street retail opportunities with this restriction.
511	DM711	SSA Planning on behalf of KFC GB Ltd	Unomintorable	Due to the size of the exclusion zone, do not consider it is possible to monitor success or failure of this policy.	This policy is considered to be monitorable.
570	DM712	Planware Ltd on behalf of McDonald's		Access to hot food takeaways is limited by school day operation (around 50% of the year) and whether or not pupils are allowed outside to take breaks/ lunches. These are important in determining dietary outcomes, and are more effective than a blanket policy.	Noted. Increasingly schools are used as activity nodes outside of school hours however.
570	DM713	Planware Ltd on behalf of McDonald's	5% too restrictive	We consider that a 5% restriction on hot food takeaways is too restrictive. For a London borough (urban area) to introduce such a low percentage restriction is considered unjustified.	Noted. It is considered appropriate given the requirement to provide a retail core along with a range of complementary town centres uses in designated centres.
570	DM714	Planware Ltd on behalf of McDonald's	Greenwich example	The Inspectorate recently concluded that the Greenwich Local Plan would be unsound if it contained the attempt in paragraph 4.3.55 to restrict new hot food takeaways within 400 m of a school. The Inspectors Report published May 2014 confirms "If such a restriction is to be imposed as a matter of policy then it must be included in Policy TC(c). However, I do not consider that such a restriction serves any land use planning purpose. In any event, I can foresee difficulties in attempting to implement such a restriction. For example, what criteria would be used to determine "unhealthy" food, and how frequently would this be assessed for an individual business? In addition, the practicalities of enforcement at a time when public expenditure is being reduced may render such a policy incapable of enforcement. Whilst it	The Public Health Directorate has published a Health Evidence Base (2012) to inform preparation of Haringey's Local Plan. This highlights the link between health outcomes and the proximity of hot food takeaways. The Council is aware of several examples of similar policies being found elsewhere in London. Action: Update supporting text to refer relevant technical evidence.

				<i>may be a laudable aim, the Local Plan would be unsound if it contained this provision.</i>	
570	DM715	Planware Ltd on behalf of McDonald's	No evidence	We consider that restricting the location of hot food takeaways would be unsound. By way of overview, the Framework provides no justification at all for using the development control system to seek to influence people's dietary choices. We recognise that the Framework has a role to enable people to live healthier lifestyles, however this should be done through creating choice, not restricting it. There is no adequate evidence to justify the underlying assumption, that locating any A5 use within certain distances of schools causes adverse health consequences, which would in turn have negative land use planning consequences. The evidence does not support this chain of reasoning or the significant restriction on the location of A5 uses	NPPF paragraph 7 clearly sets out the three dimensions of sustainable development that the planning system has a role in addressing. This includes a social role of supporting strong, vibrant and healthy communities. The Council considers the policy is consistent with the NPPF. The Public Health Directorate has published a Health Evidence Base (2012) to inform preparation of Haringey's Local Plan. This highlights the link between health outcomes and the proximity of hot food takeaways. The Council is aware of several examples of similar policies being found elsewhere in London. Action: Update supporting text to refer relevant technical evidence.
570	DM716	Planware Ltd on behalf of McDonald's	NPPF conformity	We have considered the document with regard to the principles set out within the Framework. Local Plans should "plan" positively for development; be justified; effective; and consistent with the Framework.	Noted.
570	DM717	Planware Ltd on behalf of McDonald's	Other use classes selling unhealthy food	There is lack of evidence to demonstrate that purchases in fast food outlets are any more or less healthy than purchases in other A Class premises	The Public Health Directorate has published a Health Evidence Base (2012) to inform preparation of Haringey's Local Plan. This highlights the link between health outcomes and the proximity of hot food takeaways. The Council is aware of several examples of similar policies being found elsewhere in London. Action: Update supporting text to refer relevant technical evidence.
570	DM718	Planware Ltd on behalf of McDonald's	Primary/ Secondary	Whilst we disagree with the notion of restricting the location of A5 uses in close proximity to secondary schools, we understand the reasoning. To limit the location of A5 uses within 400m of primary schools has no justification or need. Primary school children are not allowed access outside of school grounds at any time of the day. Any trips to takeaways will therefore be conducted with their parents. Proximity to primary schools should therefore not be considered viable or justified in a planning context.	The Public Health Directorate has published a Health Evidence Base (2012) to inform preparation of Haringey's Local Plan. This highlights the link between health outcomes and the proximity of hot food takeaways. The Council is aware of several examples of similar policies being found elsewhere in London.
589	DM719	Anonymous	Supports policy	400m fast food free zone around schools for it encourages obesity in children, and the roads around the fast food shops become squalid with litter and debris	Support is noted.
593	DM720	John Crompton, local resident	Robustness	Take away – again no objection to it being in here, but has any of this been put to the test through the appeal process?	The Council is aware of several examples of similar policies being found elsewhere in London.
597	DM721	Mary White, local resident	Support Policies	Restrictions regarding DM 56 hot food takeaways, would also be very welcome given concerns over rising obesity levels and their associated health issues. It is very alarming to see queues of primary school children at a fried chicken takeaway shop just yards from their school, so measures to restrict this would hopefully be of help.	Support is noted.

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Respondent ID	Comment ID	Respondent	Topic	Summary of Response	Council Response
818	DM722	Our Tottenham	Jobs and training	DM57 is inadequate. No targets are provided nor any consideration of what kinds of jobs and training Haringey needs. No evidence base is referred to or cross references to other strategic documents	Noted. Strategic Policy SP9 sets out the policy on this issue. The proposed policy reinforces the approach. Further information will be set out in a new policy on the use of planning obligations. Action: New policy on the use of planning obligations.