

COMMENTS ON THE NEWHAM LOCAL PLAN 'REFRESH' 17 December 2021

FRIENDS OF QUEENS MARKET

friendsofqueensmarket@yahoo.co.uk
142 Clements Road, London E6 2DL

Introduction

Friends of Queen's Market exists to support, promote and protect Queen's Market. When we are thinking of the health and future of the borough we see Queen's Market playing a starring role because it has always fulfilled so many of the borough's targets and objectives.

We are therefore commenting on the Local Plan mainly through the lens of Queen's Market and Green Street and are keen to 'Get involved in Shaping Newham's future together'. If there is doubt within the Council as to whether the present Queen's Market is supported by Newham's residents and beyond, we are happy to re-establish its supporter numbers in early 2022.

We note the Local Plan uses many photographs of Queen's Market traders and customers as illustrations.

Our experience of consultation on the Local Plan in Newham:

1. In 2011 we attended the Core Strategy Examination and made detailed arguments against the proposed site allocation for the Market which named it as a strategic development site. The Inspector Geoffrey Salter in his report showed that he had listened, saying that the Queen's Market building was quite sound (though unattractive!) and 'far from irreparable'. He acknowledged the local fears aroused by the Council's last scheme to redevelop the market but noted that then last scheme had been discarded. Describing the market as 'vibrant and vital' he said that in the light of Council promises to retain the market 'a scheme for redevelopment or possibly refurbishment would be acceptable'.
2. In 2017 we submitted extensive comments on the Local Plan Review Options and Issues (attached at the end of this document for reference). We don't recall receiving any feedback on our response and there was no indication that any of our points were heard.

3. Despite having sent this and being part of the previous Examination, the Council failed to advise us of the due date for submissions to the final stage of consultation on the Local Plan. We were therefore unable to take part in the Examination of the 2018 Plan.

Current Local Plan consultation

When the current Mayor and administration took office, we reaffirmed our strong opposition to the Local Plan site allocation for Queen's Market as a 'strategic site', which puts it under threat from development plans. In response, several members of staff and the Mayor told us that they were reluctantly bound to the wording in the recently launched Local Plan, but that the Plan would be revised in due course.

Therefore, **this should be the moment when the Council / Local Plan team revisits this site allocation** and refreshes its understanding of the importance of the Market as *it currently operates and could more successfully operate*. As the Council knows, the 2021 Leeds Report Markets4People has provided strong evidence, as guidance.
<https://trmcommunityvalue.leeds.ac.uk/new-evidence-for-the-community-value-of-markets/>

Response to Issues and Options

Issues and Options Our Climate

We agree with all the climate initiatives

Queen's Market is an example of

- less plastic from food packaging
- Recycling of food waste (discontinued but ran well for several years)
- Recycling of packing materials (discontinued but ran well for several years)
- A structurally sound building that can be retained and future-proofed for traders and customers
- Potential for use of some of the building's roof / car park area for food growing

Q: How do we encourage all developers to deliver net zero on site today, and minimise retrofit costs in the next 20 years?

A: It takes more than encouragement: the Plan should include mandatory policies.

Issues and Options Our High Streets

Q: *What is missing?*

A: Newham needs to understand the relationship between Queen's Market and Green Street High Street, as they are interlinked: customers come for one and visit the other, and vice versa. The Council should bring together work on Green Street and Queen's Market, not keep them separate.

All changes proposed for retail and other businesses should be based on thorough understanding of those businesses through careful dialogue with local business owners and their customers, so that plans do not jeopardise local businesses.

Issues and Options Our Neighbourhoods

As already stated, we do not agree with the site allocation for Queen's Market, which needs to be revised. We do not believe that the extent of proposed additions to the Market, currently proposed as housing, library and health centre, will allow the Market to continue in its current form. Regarding the brief for the Capacity and Viability Study, we do not think this asks the right questions or begins from the correct starting-point.

"There are many residents in Newham who face high levels of poverty and an unhealthy urban environment in terms of air quality, access to food and housing provision." (p20).

This is the key reason for the continued existence of Queen's Market as a source of affordable healthy food. The Council needs to understand this much better when co-ordinating any changes to the Green Street / Queen's Market neighbourhood, so that it can conform with the strategic priority above.

Issues and Options Our Economy

It is well known that markets provide entry-level jobs, support businesses to go on to expand, provide flexible trading places that traders control, and allow businesses to test the market inexpensively. The Council however only sees Queen's Market as a source of income for them, not for the traders and employees.

In line with affordable workspace policy it is crucial that the Council stops raising rents in the market, and provides secure tenancies. It needs to reform the management of the market so that the stall pitches are full. Without this, the council is not “supporting a more inclusive economy”.

Markets need a critical mass of traders to be a success, not spaces and shut-up shops.

In her Introduction the Mayor says: “Putting people at the heart of everything we do means making sure the design, function and feel of neighbourhoods creates places people can call home and want to start businesses in.” Yet where is the emphasis on existing businesses? The best advantage for any new business is to enter a place where there is already thriving businesses, meaning that it should be paramount to support existing local enterprise.

Policy additions:

Queen’s Market, as Newham’s largest and most significant street market, should be named within the Economy chapter.

The protection of existing businesses should be part of any development process in the Borough.

Issues and Options Our Community Facilities

The Leeds Report on Queen’s Market shone a light on the value of the market as a social space, a place where people feel safe, meet friends and talk to people they may not otherwise talk to, especially valuable to people who are lonely or may not speak the language. The Leeds evidence backs up our own empirical knowledge and experience.

<https://trmcommunityvalue.leeds.ac.uk/new-evidence-for-the-community-value-of-markets/>

In Community Facilities policy it is vital to see the value of Queen’s Market as a social space. Especially as it is an Asset of Community Value.

Issues and Options Our Homes

Friends of Queens Market supports the intention to provide many more social rented homes and believe the priorities should be affordability, safety and the climate emergency.

We campaigned for 100% affordable housing in the Boleyn Ground development (something suggested by an officer in Tower Hamlets for a different site, and therefore not an unknown idea) The final total of social rented housing there is woeful. But with affordable homes must come social infrastructure and continued access to affordable food and goods - which the Market provides. We believe that the Market will not survive if given over as a housing site to developers with developers' economic models. The Housing policies must include the requirement for social infrastructure.

Issues and Options Our Plan

All improvements to the communication of the information are welcomed. It's important to also listen to those people being consulted. See comments on SCI below.

Issues and Options Our Waste and Utilities

At Queen's Market several years ago under different management, recycling was profitable for the Market, as boxes, pallets, cardboard were sent out and payment was received. The food waste was taken to the City Farm. This was sustainable waste disposal, which could be re-introduced.

Issues and Options Our Vision

Is there anything missing from the vision and from table 1 to ensure we meet Newham's needs?

Yes - Supporting and protecting Queen's Market. We believe the Council can deliver its five principles of recovery through supporting and protecting Queen's Market:

A Healthy, Happy and Well Newham -

The Market is a source of affordable, fresh food; a place to meet others in a social space, as evidenced in the Leeds Report.

Community Wealth Building -

Allowing traders to grow in the space, allowing more traders to trade, above all keeping rents low, reforming the management: this would represent community wealth building at Queen's Market.

Brighter Futures, The Best Place for Children and Young People to Thrive -
Queen's Market provides the food they need and a welcoming space.

Tackling Racism, Inequality and Disproportionality -

Queen's Market is known for its diversity and is a focus for people from coming together. It provides for people from the lowest-income backgrounds and therefore tackles inequality.

Putting People at the Heart of Everything We Do -

Shoppers and traders in Queen's Market are a significant part of the population of Newham.

Answers to questions posed:

What are your hopes for the future of Newham?

Our hope is that Queen's Market is retained and improved, cared for and better managed for its current traders and customers, without throwing the baby out with the bath water.

What are your fears for the future of Newham?

Our fear is that the Council is more interested in incoming residents and businesses than its current residents. And in the case of the Market, its policy on the Market is being driven by people who do not understand, appreciate or see the value of the current market. Our fear for the future is therefore that some people, generally from the lowest income groups, no longer have a space in Newham and are pushed out by economic forces.

Should we have one overarching policy which highlights what sustainable growth is in Newham?

A definition of what is Sustainable Growth in practice would be valuable, as the word has been exploited and mis-used for years.

See comments follow

APPENDIX

LOCAL PLAN REVIEW OPTIONS AND ISSUES

Comments by Friends of Queen's Market

April 2017

Introduction

Friends of Queen's Market is a voluntary organization seeking to secure the affordable market in its current location. Queen's Market is a thriving and profitable covered street market. It has been in existence for over a century and is at the heart of a vibrant community that draws in people from across London and beyond. Famed for its affordable and culturally appropriate produce, it is much more than just a market, it is a living information exchange and a communal space. Queen's Market is an important centre of employment and brings in millions of pounds into the local economy. It exudes entrepreneurial spirit, tolerance and good humour.

We also include a concern for Green Street businesses in the overall character and context of Queen's Market.

We believe the Council's efforts should be towards acknowledging the social and economic benefits of the market and Green Street and securing their future within any strategic plans for the borough.

We have submitted our views to the Local Plan at the previous stage and have found it difficult to be considered by Newham as equal stakeholders alongside others such as landowners and developers.

Nothing in the current Issues and Options document appears to justify a change from our original objection to the core Strategy that *Queen's Market should not be included as a site for further development*. Our view, with which the Examining Inspector expressed some sympathy, was that it should be *restored, refurbished and in the process still retain its current long-standing unique offer of a variety of low-cost food and cloth for some of the most disadvantaged communities in London*.

The desire of the Mayor of Newham to alter the social makeup of the borough has been well documented. This policy revision exercise (in particular for Green Street and Queen's Market, but no doubt in other parts of Newham) could be seen, from the most pessimistic viewpoint, as a way to enact corporate policy by the back door, using misleading or technical language and an inaccessible process to ensure that the people who may be directly affected by the proposed changes will not be alerted to these changes and will therefore have no voice. Planning policy is such that even documents in transition or in process can be considered material in decisions.

We therefore ask that the 'corporate aims' behind these policies are fully spelled out and the documents re-presented to the people of Newham in a clear, understandable and accessible way before any amendments are made or acted upon in planning decisions.

We would be glad to meet with strategic planners to go through these concerns.

Vision and Spatial Policies

We welcome proposed changes to policy where this will impact on quality of life for Newham residents, for example tightening up the policy on tall buildings to prevent blanket tall building coverage across Newham. We welcome policy that recognizes the negative impact of tall buildings on health and wellbeing depending on where they are sited.

But tall buildings per se are not the problem. The problem is the effect on the local community of regeneration schemes that seek to raise land values and force long-term residents and businesses out of the borough.

Our special interest is Queen's Market, which is an important place as a shopping destination because of its value offer and provision of specialized food and domestic items as well as being a site of social interaction and community cohesion. Newham Council's own website describes it as 'one of London's most famous and diverse markets and one of its cheapest....right next to Upton Park on vibrant Green Street'.

Option 1. CONS: Missing opportunities, not addressing new challenges.

Option 2. CONS: a missed opportunity to maximise the benefits of a site.

It is not clear what this language means in relation to QM.

Option 6a. Spatial Policy Options : Bring convergence, resilience and stable, mixed and balanced communities and 'homes not at the expense of jobs' objectives into the policy criteria (rather than just the start of the policy S1).

We agree with Homes not at the expense of jobs.

Do any of the thematic policies (successful places, jobs, homes, sustainability, transport etc.) need to be further translated into implications for particular areas?

Answer: YES. There is no way to evaluate the policy without knowing the real plan that Newham has in mind for Queen's Market and Green Street.

Is there anything that creates and maintains successful and distinctive places in Newham that is not covered in the Local Plan?

Answer: YES – Diverse town centres, where all are welcome and all can contribute and all can afford to use, are what make a successful and distinctive place. Compare Westfield with the Stratford Centre. These two places are different (even though the Council now seems to want the SS to become like Westfield, by raising rents). The reason is that the SS accommodates a range of shops that are accessible to a greater number of economic backgrounds. Many people prefer the SS and many smaller traders benefit from it. The Council has got to recognise and understand the benefits of this.

Also – Green Street is a place for a particular kind of goods – a world famous location and the first and one of the most celebrated Asian shopping destinations in the UK. There is no point in making all town centres the same.

Also – Public Space that is not corporate but is publicly owned – like QM – is vital for achieving distinct places that allow freedom of expression and group ownership, preventing the division of the public domain according to who can afford to be there and who cannot.

Is it helpful to define what a tall building is in the context of Newham: what is regarded as tall in this context?

Yes it is helpful. Shadowing must be a factor in the siting of these buildings.

Would the creation of large strategic sites in multiple ownership at town centres in the borough help catalyse regeneration?

What does this mean? CPO for small individual sites for the creation of mega-sites in corporate ownership? NO! For the answers given above re diversity.

Do the proposed edits and additions to the Successful Places policies raise any significant issues?

This Review document needs to explain the meaning behind some of its language so that people can genuinely evaluate it and contribute. For example “catalytic” “opportunity” “big impact”. These are obscure, even dog-whistle terms, written for potential developers. It is against the principles of accessibility and equality to use terms such as these. They are not readily understandable in the context of planning. We believe they should be expressed differently, as explained in our introduction.

Successful Places

We welcome that the council agrees that successful places “recognise the value of natural, cultural, historical, architectural and infrastructural assets in the borough and ensure that new developments conserve and enhance these assets to place-making”.

The public said: “Town centres need upgrading and investment to provide a better environment as well as better shopping and leisure Opportunities.”

The question again is how does the Council interpret the meaning of the word “better” ? Better for whom? We have argued for investment in Queen’s Market to make it better and even at a basic level watertight. There are simple things that can be done to make the shopping experience at Queen’s Market ‘better’ while not losing its fundamental benefit as a place for affordable food and goods and its position.

Option 3: Support town centre place-quality through being clearer about the opportunities at the Green Street (Queens Market) Strategic Site.

Identifying larger scale development opportunities which can have a more noticeable ‘big hit’ and potentially catalytic impact on them due to their scale is also important.

The phrase ‘big hit’ appears to indicate fundamental alterations, as above. There is nothing to say what is meant by a ‘catalytic’ impact. Exactly what impact is being sought in the plans for Green Street? A planning document must be clear in setting out what its intentions are.

What exactly do ‘big hit’ ‘ambitious’ and ‘catalytic’ changes mean for a person who owns a stall in Queen’s Market, who buys affordable goods at Queen’s Market, who travels from outside the borough to shop in Green Street for specialized goods or who wishes to stay in the area near their family and buy or rent a property they can afford?

Friends of Queens Market oppose any option that involves, or appears to involve, the demolition of Hamara Ghar, the demolition of the market compound, the demolition of the existing market structure and replacement by a smaller market to make room for hundreds of luxury flats, which the last proposal envisaged. The phrase 'big hit' appears to indicate fundamental alterations above. There is nothing to say what is meant by a 'catalytic' impact.

We do not agree that town centre place-making will be improved by the loss of the existing market.

Q Are site boundaries appropriate?

Friends of Queens Market oppose any option that involves, or appears to involve, the demolition of Hamara Ghar, the demolition of the market compound, the demolition of the existing market structure and replacement by a smaller market to make room for hundreds of luxury flats, which the last proposal envisaged.

Q Have all constraints and opportunities been identified/ considered?

The opportunity to retain and improve Queen's Market has not been considered.

Q Are there any other area-specific issues that we should be considering?

A proper analysis of the economic and social benefits of Queen's Market to the community is needed.

For example, the introduction states: 'Town centres face challenges from changes in shopping behaviours, notably a shift to more 'basket'/top up shopping, internet shopping, and an increased importance of leisure spend.'

Queen's Market in fact serves a section of the market outside this demographic: many people depend on Queen's Market for their weekly major shop, (which is why Newham's higher car park charges have a highly significant effect: they actively put people off bulk-buying).

"Identifying sites beyond individual ownerships".

What does this mean? CPO for small individual sites for the creation of mega-sites in corporate ownership? NO!

Option4:

Clarify how excessive linear concentrations will be assessed, making it clear that no more than 2 specified uses in a row will be supported, with the expectation that between such clusters should be at least 2 units (in SP10)

This shows a clear intention in "broader policy context and corporate initiatives" to attack the fundamental character of Green Street, which is one of a specialized offer of x y and z to quote Newham's own description (on website) The proposal is a very specialized suggestion that has potentially major impacts on Green Street. Exactly what impact is being sought in the plans for Green Street? A planning document must be clear in setting out what its intentions are, in order that people are able to comment.

A full list of the businesses or business representatives in Green Street must be drawn up and these people must be directly involved in the discussions over revisions to the town centre policy regarding this proposed Option 4.

Queens Market Site S27

<https://www.newham.gov.uk/Documents/Environment%20and%20planning/LPRIssuesOptionPart2.pdf>

We have seen nothing in the current Issues and Options document to justify a change from our original objection to the core Strategy that *Queen's Market should not be included as a site for further development. It has been designated wrongly for 'retail, residential and community uses'* and our view, with which the Examining Inspector I.D.Kemp expressed some sympathy, that it should be *restored, refurbished and in the process still retain its current long-standing unique offer of a variety of low-cost food and cloth for some of the most disadvantaged communities in London.*

Densities should reflect the prime location next to a London Underground station.

We do not believe the designation warrants a higher density, as this station in its present form could not support a higher level of passengers.

Raising density levels from medium to high needs to be supported by evidence of its effects on the local population and many other social and economic effects, together with infrastructure needs.

High Density, 4-6 storeys; up to 14 adjacent to the Underground station

To specify 14 Storeys next to the Underground station would have a massive impact on the market space, as it is south of the station and shadowing would be significant. This specification should not be there as it is more like an encouragement for the same type of development that was proposed before, which we believe is not appropriate and which was not supported by the Mayor of London.

A viable Market

We don't understand the reason for the addition of 'viable'. This sounds like a developer would have the choice of delivering a market or not, according to his own viability evidence which everyone knows is biased in favour of the applicant. We need to know the reason for adding this word. The present market is viable, as the council knows.

Jobs and Skills

Are we doing enough to protect/support existing businesses and allowing them to expand across the borough?

No. We want existing businesses at Queen's Market to be fully supported and protected by the Council.

Is there anything else planning can do to support economic growth?

Yes, planners should be fully aware and up to date with the types of businesses and the economy of small businesses in the borough and calculate how taken as a whole and area-by-area they are a significant part of the economy and growth, contributing to employment and general stability. So that when changes are proposed the council is aware of the basic situation and what needs to be protected.

QUEENS MARKET AMENDMENT

We feel that this amendment is another way to gain control of the area without telling the relevant people: residents of Hamara Ghar and the related Queen's Market itself, referred to in the text. Once this amendment is passed, silently and without much knowledge, the Council will be able to point to it in policy as their permission.

While some of the rationale makes sense, such as the creation of more jobs and a possible intensifying of uses, plus inclusive community facilities, we think that in the interests of equality and transparency the amendment needs to be spelled out to people in a way that fully explains its reasoning and possible impact. Some form of mitigation of 'initial negative impacts' is referred to under point 1. And this is exactly what we are saying: these impacts need to be explained and not just hinted at.

Point 3. refers to 'replacement of the market' and here is where we need more explanation as to what this actually means. In point 5. 'allocation is likely to disrupt existing active business / commercial uses within the town centre.' We are totally opposed to the removal or forced disruption of the current traders who make up the current Queen's Market.

The loss of the lock-up to the market will also prevent its viable use -----

We repeat that the Council must draw together a more accessible version of this Local Plan review, to explain to people what their real plans are and what are the possible impacts. Otherwise this is top-down planning at its worst, which will not deliver benefits to improve the health and economic situation of a great number of people in the Queen's Market Green Street area as well as their thousands of customers.