

## **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.