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Please find attached our response to the Local Plan regulation 19 consultation.

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best wishes

Lucy Rogers
Friends of Queen's Market

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20 September 2024

FRIENDS OF QUEENS MARKET Response to the Newham Local Plan Regulation 19

Introduction

Friends of Queen's Market is a local voluntary group established for 22 years whose aim is to protect and support Queen's Market, as reflected in our community charter. This response to the Plan focuses on Queen's Market.

The special and important attributes of Queen's Market are its provision of genuinely affordable, fresh food, cloth, clothes and other goods relied on by many thousands of Newham's residents and from further afield, from many ethnic backgrounds, as well as its role as a community space that is beneficial for social wellbeing and mixing. It is rare as a covered market and its shops and kiosks inside are integral to the market in conjunction with the stalls.

In the Plan's introduction the Mayor reminds us:

Nearly three quarters (72 per cent) of our residents are from Black, Asian and ethnically diverse communities.

And she refers to Newham's Corporate Plan for building *A Fairer Newham*, which sets out the general situation:

Over a quarter of our neighbourhoods are in the 20% of most deprived neighbourhoods in the country. Over a quarter of our residents are paid below the London Living wage. After housing costs, almost half of our residents live in poverty. Our average rents represent 65% of average wages compared to 30% across the UK. This situation will be exacerbated by the cost of living emergency. It will disproportionately hit Newham residents because of embedded structural inequalities we face. This crisis will worsen existing challenges such as in-work poverty, low disposal income and high housing costs.

The service provided by Queen's Market is vitally important in this context.

The Plan claims that the council will ‘retain’ and ‘protect’ the market (see the *N14 Green Street Vision*). It is therefore necessary that the Plan sets out the facts of the attributes of the existing market as it stands today, as recognised by its users and by the council, if the same market is to be protected.

We note that the site allocation for the Market has been withdrawn. Regardless of this, the Plan is unsound because it will not ‘protect’ the Market in the way that is required. Should the site be developed in ways proposed - as seen in the *Green Street Vision* and a Tall Building Zone in Green Street - the market would not survive in its current form as an affordable market with affordable rents that enable low prices for customers; a place where shoppers in their thousands depend on those low prices for their survival. A council-built scheme is unlikely, so the site would be passed to private developers who would have no reason to retain the low-cost rents for shops and stalls. The Council would forfeit its control of those rents and its provision of the market. We have found no precedent for a street market being able to continue operating in the same way encircled by new development: the common outcome is the alienation and displacement of existing users and traders.

In the council’s explanation of the withdrawal of the site allocation, reference is made to the *Queen’s Market and Hamara Ghar Investment Strategy* that began in 2020. In May 2024 the public was presented with only two “options” for a future strategy - reduced from the original five options - both of which involve the demolition of the entire market site (not the Hamara Ghar building) to build housing and a health centre. The public has objected strongly to the threat of loss of the market buildings and the market, such as through a petition of over 6,000 names, and we wait to see whether these objections will be taken into account. NB our letter about the consultation in May can be found here: <https://friendsofqueensmarket.org.uk/wp-content/uploads/2024/07/foqm-consultation-letter-june2024.pdf>

In summary:

1. Queen’s Market conforms with Newham’s key policies and aims
2. But the market’s attributes are not sufficiently recognised within the Plan.
3. Policy could not therefore support the protection / re-provision of the market, as is claimed in the Plan. This makes it not effective or deliverable and not based on robust evidence.
4. It is inconsistent with national policy.
5. The Plan should be remedied.

A note on Friends of Queens Market and the Local Plan:

Friends of Queen's Market took part in the 2012 Local Plan Examination (where the inspector commended the market as 'vibrant and vital' and 'far from irreparable'). In 2017 we wrote on the Issues and Options and we wanted to speak on the "Queen's Market Amendment" but the inspector denied us the chance, on advice from the council, despite us not having been informed of deadlines by the council. In 2021 we submitted a response to the SCI and following that to the new Local Plan regulation 18.

1. Queen's Market conforms with key policies and aims, as follows:

- A) ***Newham Markets Strategy and Policy Review*** by The Retail Group was commissioned by the council in 2020. Newham has only two large market places, Stratford and Queen's Market, which were the main subjects of the Review. Note the final report has not been shown on the 'co-create' website.

Here the Review explains how Newham's markets support of a raft of policies.

"The following Borough wide Policy and Strategies have been reviewed:

Towards a better Newham

'An economy that works for our residents and delivers a place where communities share the benefits, no matter their background'.

All 8 pillars can be supported by the markets, their offer, delivery and interaction with borough residents.

Community Wealth Building

'An approach to economic regeneration, which focuses on enabling measures that support communities to create wealth and retain more of the benefits of economic growth emerging locally'.

At least 7 policy / outcomes are able to be supported / delivered / implemented by markets and the offer, operations and community connection

Well Newham 50 Steps to a Healthier Borough Health and Wellbeing Strategy 2020-2023 *'Improving the health of every individual within the Newham community is more important than it ever has been'.*

At least 3 policy / outcomes are fully supported by markets.

Newham's markets have an essential role to play in delivering the wider aspirations and achieving the Council's vision for local communities, community wealth building, improving the health and wellbeing of residents and providing lifelong opportunities for existing and future residents of the Borough.

Indeed, this principle is a central building block for the future Markets Vision and Strategy that follows."

Note:

Other markets operated by Newham Council are:

Pilgrims Way (2 stalls, according to the above Review)

Kelland Road (8 pitches)

Markets operated privately:

Woodgrange Market (Saturdays only)

Rathbone Market (was previously run by Newham. Following redevelopment of the site there are now very few stalls, no manager, non-standard hours, no fruit and veg)

B) **The Plan's Objectives 1 and 2 2024** - *A healthier Newham and ageing well, An inclusive economy to support people in these hard times* - are fully met by the role played by Queen's Market.

C) **Newham Character Study (2018)** sets out the character of the market and Green Street:

Page 99 Retail development/high streets: traditional, markets, shopping centres (malls) and 'out of town'

Markets:

- Strong community focus, adds vibrancy, colour and variety to urban town centres making them a focus for visitors
- Specialist markets attract a wider catchment which also benefits the surrounding town centre
- Widens the range of goods that might otherwise be available in the town centre
- Supports businesses in immediate vicinity that provide a service to market traders and the public.

- High quality or 'famous' markets attract a visitor economy
- Small-scale employment opportunities
- *Low cost goods available due to low rents.*
- Stimulates fledgling businesses: an opportunity for new traders to test the market for new products and services

Page 178 Key locations for the community (meeting places, local shopping parades, parks, and so on

- Priory Park
- Specialist Asian shopping/leisure destination
- *Queens Market*
- Various community centres across the area, including youth clubs
- Various pubs (e.g. The Queens, The Duke of Edinburgh, The Boleyn)
- Green Street Local Service Centre/ Library
- Various churches, Islamic centres and temples, and schools.

Strengths

- Asian identity of town centre. Green Street is an international retail destination for Asian clothing, jewellery and accessories, particularly wedding related items.
- Also includes Queens Market, an important retail and *community space*, and other key retail clusters.

Page 180 Areas of sensitivity to change

- Cultural sensitivity of schemes on Green Street, given its London-wide draw for Asian shoppers and also attractions for international visitors.
- Other important locations for the community (as identified above)

D) ***Newham Characterisation Study 2024*** - Vision neighbourhood principles on pages 250-51 state:

'The Queen's Market was specifically noted as a key asset through the engagement process. *"I visit three times a week. It is important for socialisation (...) It is essential to my household's wellbeing because I buy fruit and veg there at the most affordable prices in Newham"* according to public engagement findings.

'Socioeconomic and cultural significance: a focal point highlighted by the local community is Queens Rd Market.

'The transform area at Upton station should be mindful of the area's significance for the local community. *The area includes the Queens Market, which is very appreciated by the local community.*'

- E) The **Report by Leeds University, Markets4People (2020)** is a detailed survey of the Market's community value, involving in-depth interviews with 500 market users as well as with management and members of the Council and the Mayor. The authors submitted the report to the Council and its findings have been cited (for example in the council's 2020 'commission brief' for the procurement process for the *Queen's Market and Hamara Ghar Investment Strategy*, then called the 'Capacity and Viability Study, mentioned in our introduction above).

<https://trmcommunityvalue.leeds.ac.uk/wp-content/uploads/sites/36/2021/06/210531-M4P-Queens-FINAL.pdf>

From the summary:

The research involved a survey of 500 market users (capturing a representative sample in terms of age, gender and ethnicity), two focus groups with selected user groups and around 10 interviews with key local actors, to contextualise the findings.

Queen's Market is particularly important to Asian and Black ethnic groups, migrants, people on low incomes and older people. Thirty-one percent of market users identify as Asian/Asian British (Indian), 25% Asian/Asian British (Pakistani/Bangladeshi) and 27% Black/Black British. The majority of market users were not born in the UK; 46% have lived in the UK more than 25 years. Sixty-nine percent are over 50 years old and 70% are women.

Queen's Market is a highly successful shopping destination of choice, specialising in quality and affordable fresh foods, clothing and textiles. The vast majority of market users do at least half of their food shopping at Queen's Market, with 21% doing all their food shopping at the market. It also drives footfall and spend in the wider town centre: 89% of users said Queen's Market was their main reason for visiting Green Street that day.

Queen's Market is a social, welcoming and supportive community asset. Ninety-two percent of market users strongly agree or agree that it is a community hub. Queen's Market is more important to market users than other community facilities (e.g. libraries, parks) and other retail and food outlets.

F) The Market was listed as an **Asset of Community Value** in 2015.

G) The **GLA report (PDU 1080 01)** on the previous planning application for the Market (08/00894/FUL), linked the provision of affordable food to rent levels and specifically to black and ethnic minority businesses. The report stated at para 64:

Policy 3B.I of the London Plan requires that the spatial needs of small and medium sized enterprises (SMEs), and black and minority ethnic businesses be addressed... The Agency therefore welcomes the discussions between the applicant and market traders to agree rent levels... *Rent levels should allow existing businesses to trade without proving unviable or requiring substantial costs to be passed onto the consumer.* London's Food Strategy states that wide inequalities exist in terms of the proportion of family spending on food, where food spending for high income households accounts for 6% of total spending compared with 26% for low income households...Affordability should also consider the service charges. As set out in the Economic Development Strategy, a major issue for SMEs is the availability of affordable premises.

2. The market has not been adequately recognised in policy

The evidence listed above is not adequately supported in the Plan's policy and supporting documents. The omissions concern three important issues: the market's affordability, its community value and its state of repair. As a result we consider the Plan unsound.

The market's affordability

- 1) The words 'low cost' or 'affordable' food and goods should appear in the Plan in relation to Queen's Market, as stated in the above 2018 Character study: 'Low cost goods available due to low rents'.
- 2) The *Retail and Leisure Study*, and *Town Centre Network Review* contain no analysis of Newham's Markets, or Queen's market and its economic role within retail, leisure and the Green Street town centre. The evidenced connection between Queen's market and Green Street is not examined: shoppers come to the market and then visit Green Street and vice versa. It is not clear whether any of the shops surveyed in the Retail and Leisure Study are located inside the market. The Market appears to be invisible in these supporting documents.

- 3) Policy HS6 Health and Wellbeing on the High Street supports affordable food and states in 3.104-5 '*There is an ongoing need to create a healthy food and drink environment, addressing affordability [sic] and access*'.
and
'Public Health research indicates that increased access to healthy, affordable food for the general population is associated with improved attitudes towards healthy eating and healthier food purchasing behaviour.'

The chapter seems driven by a focus on hot food takeaways. Queen's Market could and should be mentioned and linked to within this chapter.

The market's community value

- 4) *Newham Community Facilities Needs Assessment* omits Queen's Market or any market from the list of facilities.

COMMUNITY FACILITY TYPE

Education with shared spaces

Community centres

Youth zones

Social clubs

Libraries

Public houses

Public toilets

Places of worship

Cultural facilities (music venues, dance halls, cinemas, theatres)

Public halls or exhibition halls

Cultural facilities (galleries)

Cultural facilities (museums)

- 5) Policy SI1 repeats the list, but Paragraph 3.92 adds '*This list is not intended to be exhaustive and other facilities may be considered community facilities*'. Queen's Market should be listed in the main list, or referred to here, just as it was listed in the *2018 Character Study* above, under 'key locations for the community'.
- 6) Previously the former site description for S27, Queen's Market referred to 'the site's commercial and community role' yet the 'community role' is not mentioned in the N14 Green Street neighbourhood profile.

The market's need of repair

- 7) When the Plan mentions Queen's Market the need for its outward improvement is always mentioned. **Policy HS4** in particular gives just two conditions for development that would impact a market. The second of these says development will be supported where:

...b. The overall visibility, quality and management of the market and its public realm will be improved.'

This holds an axe above the market because for the past ten to fifteen years it is the fault of the council that they have consistently failed to act on the calls of traders, shoppers and others to improve the market environment: clean it properly, paint it, repair the roof effectively, deal with leaks and the blocked drains, manage it correctly. The *Newham Markets Strategy Review* found yet again that simple cleaning was what people said was needed. Even now, with a £7.3 million 'Good Growth' grant for Queen's Market, no real improvement has yet been seen. The roof still leaks but the grant apparently does not cover its repair.

Yet the Good Growth grant has at least this year provided new toilets. Queen's Square, the small outdoor space adjacent to the market building, has been redesigned and completed. A new manager's office has been fitted out. The money has been given to the Market explicitly *'to focus on upgrading the market to help improve its look, feel and function. These improvements are designed to improve the experience for both traders and shoppers and encourage more people to visit, spend and enjoy all that is on offer'* (co-create website Good Growth pages).

The market is highly vulnerable within **Policy HS4** and the policy needs to be changed. Assuming that the Good Growth grant finally produces improvements, all references to the appearance of the market throughout the Plan need to be corrected and updated, for example in the 'Vision for Green Street' Queen's Market *'requires improvements to the public realm, toilets and market facilities'*.

When the Plan talks of introducing pop-ups and nighttime activities, this could have been happening for years and could still happen. The market does not need to be redeveloped in order to introduce those things: it needs to be cleaned and looked after if the Council is seeking to welcome more people in.

3. The Plan cannot protect the market: the Plan is not effective or deliverable

In the *Main Changes to Neighbourhoods* document it is claimed that ‘policies in the Local Plan continue to protect the market’. However we believe the Plan will not protect the market due to the omissions and inaccuracies above. It is therefore not effective or deliverable. The omission of mention of the market’s role or significance is not justified or based on credible evidence. A possible redevelopment of the market is not justified by policy.

At recent consultations (for the *Investment Strategy Study* as mentioned above) the proposal to build housing on the site has been offered as a benefit which could outweigh the loss of the market. But the potential loss of the market cannot be weighed against any gains unless there is a correct recognition of its value.

A definition of what the Council means by “the market” or “Queen’s Market” is needed.

The words could simply mean a collection of stalls either outside or inside, with new traders and under private management. The Plan should describe the market as:

- A covered market
- 166 pitches of a size as per existing traders’ licenses
- 72 shops of a size as per existing leases
- The existing number and size of kiosks
- Affordable, low prices due to the current stall and shop rents and leases
- The existing amount of storage space
- A community space

Policy SI1 and SI2.

Because the Market is not named within the Community Facilities policy it does not benefit from the requirements of the policy when building or replacing those facilities, such as requiring a Social Value and Health Impact Assessment. This is why Queen’s Market needs to be named in this policy.

Policy HS4:

Traders and shoppers are experiencing a poor standard of consultation and liaison between themselves and the council’s team during the current ‘Good Growth’ works, with decisions such as the specification of new lights being made without traders’ involvement, at great cost and harming the market’s operation. If the same were to happen during a major redevelopment there would be no hope of securing a development which preserved the good operation and integrity of the market. Support for any redevelopment of Queen’s Market, or any market, should be subject to more conditions than those listed in Policy HS4. They would include:

- HS4 1. Development impacting on an existing internal or external market site will only be supported where:
- The number **and size** of pitches is maintained or enhanced, alongside provision of appropriate storage and servicing facilities, both during development (including temporary arrangements) and upon completion.
- Delete current HS4 1b
- Existing stallholders and shop traders are given first priority to remain along with their existing leases.
- Existing rent levels for stallholders and shops are maintained.
- An internal, covered market remains an internal, covered market.
- A trader and shopper group (in the case of Queen's Market this would include the Queen's Market Traders Union and the Friends of Queen's Market) established by common agreement of a market's recognised traders and shoppers is given powers to be recognised, consulted, liaise with the council and/or developers and make meaningful decisions for the benefit of the market, its operation and its traders and shoppers throughout the full duration of any development including during temporary arrangements.

4. The plan is inconsistent with London and national policy

Any proposed redevelopment of the market within the Plan does not take into account NPPF 8 access to healthier food, including the fact that it classes local shops - which could include a market - as community facilities.

NPPF 8. Promoting healthy and safe communities

96 (94) Planning policies and decisions should aim to achieve healthy, inclusive and safe places and (beautiful) buildings which:

c) enable and support healthy lifestyles, especially where this would address identified local health and well-being needs – for example through the provision of safe and accessible green infrastructure, sports facilities, **local shops, access to healthier food**, allotments and layouts that encourage walking and cycling.

97.95. To provide the social, recreational and cultural facilities and services the community needs, planning policies and decisions should:

a) plan positively for the provision and use of shared spaces, **community facilities (such as local shops, meeting places, sports venues, open space, cultural buildings, public houses and places of worship)** and other local

services to enhance the sustainability of communities and residential environments;

London Plan policy SD10:

The effect of the access to affordable food for a significant percentage of the population which the market provides has not been measured; also measured should be the risks associated with terminating this access. London Plan SD10 says

B Boroughs should: 1) identify Strategic Areas for Regeneration in Local Plans and develop policies that are based on a *thorough understanding of the demographics of communities and their needs*

C Development Plans, Opportunity Area Planning Frameworks and development proposals should contribute to regeneration by **tackling inequalities** and the environmental, economic and social barriers that affect the lives of people in the area, especially in Strategic and Local Areas for Regeneration.

5. Locations for remedies

N14 Green Street Neighbourhood Profile

N14 Green Street Vision

HS4 Markets and events/pop-up spaces, only seen at para 3.96

HS6 Health and Wellbeing on the High Street p143

SI1 Community Facilities

Supporting documents should include:

Newham Markets Strategy and Policy Review (as above at 1A)

Leeds University Markets4People Study (as above at 1E)

GLA Understanding London's Markets (2017)

Remedies summarised below (these appear in the above text with more supporting detail):

A definition of what the Council means by “the market” or “Queen’s Market” is needed.

The Plan should describe the market as:

- A covered market

- 166 pitches of a size as per existing traders' licenses
- 72 shops of a size as per existing leases
- The existing number and size of kiosks
- Affordable, low prices due to the current stall and shop rents and leases
- The existing amount of storage space
- A community space

Policy SI1 and SI2.

Queen's Market needs to be named as a community facility in this policy.

Policy HS4:

Support for any redevelopment of Queen's Market, or any market, should be subject to more conditions than those listed in Policy HS4. They would include:

- HS4 1. Development impacting on an existing internal or external market site will only be supported where:
 - The number **and size** of pitches is maintained or enhanced, alongside provision of appropriate storage and servicing facilities, both during development (including temporary arrangements) and upon completion.
 - Delete current HS4 1b
 - Existing stallholders and shop traders are given first priority to remain along with their existing leases.
 - Existing rent levels for stallholders and shops are maintained.
 - An internal, covered market remains an internal, covered market.
 - A trader and shopper group (in the case of Queen's Market this would include the Queen's Market Traders Union and the Friends of Queen's Market) established by common agreement of a market's recognised traders and shoppers is given powers to be recognised, consulted, liaise with the council and/or developers and make meaningful decisions for the benefit of the market, its operation and its traders and shoppers throughout the full duration of any development including during temporary arrangements.

Policy HS6:

Queen's Market should be mentioned and linked to within this chapter.

And

References to the appearance of the market throughout the Plan need to be corrected and updated

(ends)

