Friends of Queen's Market

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ANSWERS TO MATTERS 1, 3 and 4 Local Plan Examination

MATTER 1

Q1.2 Was the consultation carried out by the Council during the preparation of the Plan in compliance with the statement of community involvement and relevant legal requirements?

We believe that public consultation has not been adequate in explaining the true impact of the Plan to enough people and gaining input into the Plan. This is shown in the very low numbers of respondents to this Regulation 19 stage and at previous stages.

In particular, for the Spatial Strategy, it is clear that the location of 'enhance areas' is not clearly set out, or mapped. People were therefore not aware of these when being consulted on the Plan.

This is contrary to the London Plan guidance for tall buildings, for example, which states:

"3.1.6 …evidence gathering and establishing the location and scale of growth in an area, provides the opportunity to engage and collaborate with the local community and other stakeholders as part of the plan making process, enabling them to help shape their surroundings."

Friends of Queen's Market have carried out our own consultations including a petition accepted by the Council currently at over 6,000 names. We are willing to give more detailed information on consultation during the Hearing.

Q1.3 Is there any substantive evidence to indicate that the requirements of section 149 of the Equality Act 2010 have not been met?

We would suggest that the limited consultation regarding Queen's Market as it appears in the Plan has not met these requirements. We could elaborate at the Hearing.

MATTER 3

Q3.1 Does policy BFN1 set out an appropriate spatial strategy, taking account of reasonable alternatives, in the context of the London Plan? In particular:
a) Directing significant levels of growth to the six neighbourhoods (N1, N2, N3, N4, N5 and N17) in the Royal Docks and Beckton Riverside Opportunity Area; two neighbourhoods (N6 and N7) in the Poplar Riverside Opportunity Area; and the N8 Stratford and Maryland neighbourhood?
b) Supporting incremental change in all of the other neighbourhoods (N9 to N16)?

No, BFN1 does not set out an appropriate spatial strategy, because the Characterisation Study upon which it is based is itself methodologically flawed, at least with regard to N14 Green Street.

BFN1 states growth and development will occur in the 3 Opportunity Areas and also "in other neighbourhoods, where land is available for development and/or intensification and where the Characterisation Study (2024) has identified it as being suitable for growth and change." (3.4)

This approach follows that set down in London Plan Policy D1 which requires boroughs "undertake area assessments to define the characteristics, qualities and value of different places within the plan area to develop an understanding of different areas' capacity for growth".

However, there are mischaracterisations and contradictions throughout the Characterisation study with regard to Queen's Market and Green Street. The Study fails to identify Queen's Market as a 'community hub' (page 49) even as it identifies Green St as a District town centre and high street, where "high streets contribute to the commercial, social, environmental and economic value of London. They are the focus for some of the highest levels of social interaction and activities where communities are at the very heart." (p 104)

Green Street is one of 6 town centres in Newham, about which the Study states "Understanding town centre and high street locations and the contribution they have to the commercial, social, environmental and economic value of Newham is key in utilising these resources to focus social interaction and activities at the heart of communities." (p 50).

However, in the detailed analysis of Green Street as a High Street on p 35, curiously, it fails to identify the clear centre of the District Centre, which is Queen's Market and the adjacent underground station. Perhaps this is unsurprising, given that this section appears to be a purely desktop exercise, with all of the pictures taken from Google Street View, which by definition is incapable of capturing a large off-street covered market.

The Characterisation study also places Green Street and Queen's Market as lying within a huge part of a central area whose urban morphology "is dominated by historic terraced housing, with social amenities such as libraries, churches and schools. The retail offer is mostly in the form of a number of local and town centres focused on main roads with predominantly independent shops and other businesses reflecting multi-cultural diversity in the area." (p 95)

However, these aspects are effectively forgotten in Chapter 7, which arrives at a map identifying low, moderate and high opportunities for growth based upon an analysis of sensitivity receptors (such as Conservation Areas and listed buildings) and the quality of the built form and "the previous analysis, illustrated on page 139" - which is in fact a photo of some anonymous buildings. At this point the Study entirely mis-characterises the use and built form of Queen's Market itself as "Apartment buildings and Estates" (map p 143). It is not, of course - it is a purpose-built covered market, the largest in the borough, of huge social value and community and commercial identity.

The Study then moves to the predetermined conclusion on p 148 that the Queen's Market specifically provides a "high opportunity for change" without any accompanying explanation, the site never having been identified up to this point in the Study. And then, bizarrely, goes on to admit that Queen's Market is a "local asset of culture or identity" and "Social infrastructure", and a site of "culture and leisure" (on maps on pp 149-50).

In the 'Conserve, Enhance or Transform' grid on p 151, "Areas of high socio economic or cultural significance, valued green and blue assets, and local asset of culture or identity" constitute areas to be conserved - and, as admitted on the maps on pg 149-50, Queen's Market is precisely that, but this social value and community and commercial identity is ignored.

Nevertheless, on that basis alone, the whole Queen's Market site and adjacent mid-rise building are identified as suitable for a tall building of 50m. The existence of a building significantly taller than its neighbours - like the Hamara Ghar sheltered housing building adjacent to Queen's Market - is clearly not sufficient reason for the sites to be identified for even taller buildings. This is stated in D3.3 “The presence of tall buildings shouldn’t be used as justification for the area being appropriate for tall buildings.” And is seen in over 40 tall buildings across the main part of Newham outside the 3 Opportunity Areas (illustrated in the map on p 165) of which only 5 are identified as sites suitable for tall buildings (map p 166).

In 'Defining Tall building zones' (166) the text states "Tall elements in key locations ... 2. Green Street... Tall Buildings Zones: For tall building zones situated near or within existing or designated future Local or Town Centres that relate to an existing low rise context, it is suggested that a limited number of tall elements is located within the tall building zone. The tall elements are here used to mark the central location and aid wayfinding." There is no need to build something simply to "mark the central location" or "aid wayfinding" - and in creating a tall building on the site of Queen's Market, the key functions of this "central location" would be wiped out.

The confusion continues in the concluding details on Green Street pp 249 - 252, where Queen's Street is acknowledged "a historic street market that provides a unique feature and offer for the neighbourhood. The market is closely linked to the local community with events and cultural and religious festivals throughout the year... Strengths: High density of social and community facilities... A sense of belonging and diverse local community was specifically noted as a key asset through the engagement process. • 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... Socio-economic and cultural significance: ...A focal point highlighted by the local community is Queens Rd Market."

But it then concludes "The transform area at Upton station [note: the station's name is Upton Park] 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. The transform area has the potential for more significant uplift in density. A tall building zone has been identified around the transform area, supporting a small number of buildings up to 50 m. Tall buildings can be considered to mark the station and should be integrated in development with a main building datum up to 21m that creates adequate transitions with the low/rise context." (251)

The Plan therefore contains little explanation as to why this very particular area is being defined as a transform area suitable for tall buildings, and absolutely no justification for the inclusion of Queen's Market in the "transform area". It is a complete contradiction of the social value of QM in the Study to include in this way.

In conclusion, the Queen's Market site should not be available for a complete redevelopment with a tall building. We find that this spatial strategy for Newham to be unsound and unjustified. This tall building label should be removed.

Q3.2 Are the Tall Building Zones listed in policy D4 Table 1 and designated on the policies map, and the "height range maximum" for each, justified and will they be effective in helping to meet the identified needs for housing and other development in an appropriate way that is consistent with national policy and the London Plan?

Tall buildings appear to be the only answer to densification or housing provision in the Plan, and there are no reasonable alternatives offered.

As above, the Characterisation Study and Tall Building Annex do not sufficiently justify the siting of a tall building in Green Street. The study overall lacks any modelling of tall buildings or detailed 3-D guidance. This is contrary to London Plan D8 3.9.5 "The Mayor will work with boroughs to provide a strategic overview of tall building locations across London and will seek to utilise 3D virtual reality digital modelling to help identify these areas, assess tall building proposals and aid public consultation and engagement."

TBZ2: Green Street.
This Tall Building Zone will not meet the need for housing in an appropriate way because the prevailing character as described is low-rise 'close-knit' terraces. "Prevailing heights" of up to 21m would be joined by those of 50m height. Surely if an area is accepted as low-rise it cannot establish a new prevailing height of 21m without knocking down half those terraces to create a new prevailing height.

TBZ 2 states: *"Development should create adequate transitions with the low rise context and protect the microclimate of the market"*. These 'transitions' would make little difference when the group of very tall buildings would dominate the surrounding neighbourhood and change its character completely.

What is meant by 'protecting the microclimate of the market'? This line should be clarified. The market is under cover but open on two sides, with some light coming through its glass roof. The inclusion of this line suggests negative impacts from any tall building.

There is no way that such a scale of development would protect the existing affordable market, making this tall building zone in direct conflict with policy N14's intention of "protecting and enhancing the role of Queen's Market" (N14.4). We explain this further in N14.

We suggest the removal of a tall building zone from the Queen's Market site.

In Gallions Reach, Albert Island and places from TBZ 5 to TBZ 21 "Careful consideration is required for suitable location of tall buildings, particularly along the water spaces, to avoid overshadowing impact on water spaces." We support this on biodiversity grounds, there should be equal consideration for their impact on humans from shadowing, wind and visual impact.

Q3.4 For policy D3 and relevant N policies to be effective: a) Should part 2 of the Plan explain / describe where the "enhance" areas are in each neighbourhood? b) Should the policies map illustrate geographically the "enhance" areas?

Yes they should be set out. This should have been done before this plan was written, so that people were aware when being consulted on the Plan. This is contrary to the London Plan guidance for tall buildings which states:
"3.1.6 …evidence gathering and establishing the location and scale of growth in an area, provides the opportunity to engage and collaborate with the local community and other stakeholders as part of the plan making process, enabling them to help shape their surroundings."

MATTER 4

Q4.16 Are policies N14 and N14.SA1 justified and will they be effective in helping to achieve sustainable development in the Green Street neighbourhood? In particular, the assumption that around 40 homes will be built on N14.SA1 between 2028 and 2033.

To achieve long-term sustainability of the population through the years covered by the Plan, the provision of affordable and healthy food to those who need it in Newham for their health and wellbeing, which is a core part of this Plan's strategy, is necessary. The market plays a part in delivering "a fairer Newham" through its delivery of genuinely affordable food and goods. Therefore, Queen's Market needs to be given the correct status in the Plan in order that its role in this is preserved. The way that Queen's Market appears in N14 should be revised in order to ensure this.

If Queen's Market is to be developed on the current model of a tall building site, 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. This is why the Tall Building label is a major threat.

Queen's Market conforms with Newham's policies and aims. As explained in previous answers, the Character Study also confirms the Market's importance as a community asset in the town centre.

London Plan policy SD10 confirms that :

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.

In particular, we draw attention to the *Newham Markets Strategy and Policy Review* by The Retail Group in 2020. Its introduction states: "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."

Leeds University produced a detailed survey of the Market's social value, involving in-depth interviews with many customers and traders as well as with management and members of the Council and the Mayor. They submitted this to the Council and it was acknowledged. Its conclusion: "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."

May we request that those two documents are put into the Examination Library?

1. Leeds Report https://trmcommunityvalue.leeds.ac.uk/resource s/our-findings/

2. *Newham Markets Strategy and Policy Review* by The Retail Group in 2020

Additions needed to N14:
(Note: we are willing to bring more detailed wording at the Hearing)

The words 'low cost' and 'affordable food and goods' should appear in the N14 in relation to Queen's Market, as is stated in the above 2018 Character study: "Low cost goods available due to low rents". The mention of affordability appears elsewhere in the Plan (location to be confirmed).

The Plan should describe the market as:

- A publicly-owned 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
- The market's commercial and community role.

A definition of what the Council means by "the market" or "Queen's Market" is needed.

A definition of what the Council means by "Queen's Market will be retained and improved" is needed. Particularly because of the Tall Buildings Label attached to the site, which we oppose.