

FURTHER ALTERATIONS TO THE LONDON PLAN

SUBMISSION FROM WARDS CORNER COMMUNITY COALITION

INTRODUCTION

Wards Corner Coalition (WCC) is a broad based coalition of groups and individuals who came together to challenge plans to demolish a city block in Seven Sisters, Tottenham, known locally as Wards Corner. WCC has campaigned since 2007 to save the market, local businesses and homes, meeting spaces and cherished buildings. WCC is made up of and supported by residents and a wide range of local and wider groups including residents associations, trader organizations, Tottenham Civic Society, Tottenham Conservation Area Advisory Committee, Pedro Achata Trust, Pueblito Paisa, the Seven Sisters Multicultural Market Traders, the Tottenham Traders Association, Tottenham & Wood Green Friends of the Earth, Sustainable Haringey, Haringey Living Streets, Seven Sisters Permaculture, The Civic Trust, The Victorian Society, English Heritage, the New Economics Foundation, the Ethical Property Foundation, Bioregional, Planning Aid for London, Parity Projects, representatives of all political parties and other groups.

This site is the entrance to Tottenham and the central point of the West Green Road and Seven Sisters District Town Centre. The Edwardian former department store which is above Seven Sister's tube station and owned by Transport for London contains an indoor market on the ground floor with traders from Colombia, Peru, Africa, Iran, the Caribbean and other countries. The Wards Corner indoor market is a major destination for London's large Latin American population (estimated one million) and other visitors from all over London who want to purchase distinct goods and foods not available elsewhere, speak their languages, meet friends, let their children play with other families and enjoy live music. It is indeed a place where people linger and spend money. If properly restored and managed, it has even more potential and could attract many more visitors to Tottenham.

After extensive work and consultation the coalition has produced an alternative Community Plan and applied to Haringey Council as the West Green Road and Seven Sisters Development Trust for planning permission. The Plan is currently awaiting a decision and is available on Haringey Council's Planning Portal¹. It is also annexed to this submission for ease of reference. An application has also been submitted for the elegant and historic Wards Corner building to be registered as an Asset of Community Value, currently awaiting a decision from Haringey Council.

Our community led plan sets out how Wards Corner could become a genuine destination and attraction for the people of Tottenham and London as a whole. However, present plans to re-locate the market occupants risk disrupting individual businesses as well as the 'Gestalt' of the market as a whole and surrounding businesses, in particular through the two-year hiatus caused by the current development plans and the tripling of rents which is expected to result.

The Coalition therefore asks the Mayor of London, Transport for London and Haringey Council to work with the community to deliver this important plan. Now is a key time for the Mayor to deliver on his appeal to Haringey Council to prevent the demolition of the Seven Sisters market at Wards Corner. In a statement on 22 July 2008 (GLA/2008/382), he said, 'I want the Council to urgently review this proposal and put the livelihood of the traders and the thousands of locals who rely on this market at the

¹<http://www.planningservices.haringey.gov.uk/portal/servlets/ApplicationSearchServlet?PKID=272550>

core of their decision'. Despite the commitment then made in September 2012 by the Mayor to direct of £284,500 to support local traders in the Seven Sisters Market in relation to the Grainger plan, traders have yet to receive any details or confirmation as to their future on the site. We eagerly await the approval of the community plan by Haringey Council, and would welcome a meeting with the Mayor of London asap in order to discuss the future of Wards Corner and how the GLA and Haringey Council can support the traders and their supporters in pursuing the community plan.

DETAILED COMMENTS ON THE FALP

Chapter 1 – Context and Strategy

A changing population

Para 1.12: This policy states that London will continue to diversify with more boroughs likely to have a majority of their population from Black, Asian and other minority ethnic communities. Tottenham - which is the eastern half of Haringey- is similar in demography to the boroughs forecast to diversify further in this way. This means that facilities proposed for Wards Corner in the community plan such as the enlarged indoor market at Wards Corner, business incubation hub and training facilities, which cater to and support diverse ethnic groups will be even more essential. We do not see any alterations to the Plan's policies which reflect and respond to the increasing ethnic diversity of London. Further alterations are needed in order to do so. We refer to the submission from the Just Space Economy and Planning Group, which provides evidence about the role and importance of ethnic retail to London's economies and communities. Alterations should be made to the policies concerning town centres, high streets and retailing in particular to reflect the specific role of ethnic retailers.

A growing and ever changing economy

Para 1.17: This policy states that the number of jobs grew in London by 3.9% and is likely to see strengthening growth. It is essential that unique employment opportunities such as those provided by Seven Sisters market together with specialist business start up facilities including digital enterprises and training in specific employment skills in the community plan are implemented. As per our comment on paragraph 1.12, we would expect to see alterations to Chapter 2 and 4 to support this. We set out some suggestions below.

Chapter 2 – London's Places

Opportunity Areas and Intensification Areas

Para 2.60 and 2.61: We note that the FALP significantly increase targets for jobs and particularly homes in the designated Opportunity and Intensification Areas. Wards Corner lies at Seven Sisters, at the southern 'gateway' of Tottenham, within the Upper Lee Valley Opportunity Area (ULVOA). Annex 1 details that the new homes target for the ULVOA has increased from 9,000 to 20,1000 homes, presumably in line with the ULVOA Planning Framework (though note our comments below). We recognise the need for new homes, but are concerned that this dramatic increase in housing targets will have very damaging repercussions for the local economy and social and community infrastructure of Tottenham. We refer to the broader statement from Our Tottenham on this point.

We would like to note that despite the active involvement of WCC in local and London-wide planning concerns for many years, we had no involvement at all in the development of the OAPF. The FALP for the ULVOA in Annex 1 note that this was produced 'by the GLA working with TfL and the London Boroughs of Enfield, Haringey, Waltham Forest and Hackney'. There is no statement of community involvement, and there has to our knowledge been no opportunity for public debate and involvement in the production of the ULVOA. The Just Space submission highlights this as a much broader problem in the preparation of OAPF's, and support their suggestion for much stronger community involvement and social impact assessment to be introduced.

Referring specifically to our experience in relation to Wards Corner, we suggest that higher housing targets require much stronger planning policies to protect existing economic, social and cultural assets from loss through new development processes. Loosing a vibrant and unique market and local economy that services both a local and London-wide population is a very perverse outcome indeed, and one which the Mayor of London has intervened on in the past in order to try to secure a future for Seven Sisters Market. We urge the Mayor and GLA to introduce much stronger mechanisms for involvement of local communities – residents and businesses – in the planning frameworks for OAs including the Upper Lee Valley. We also consider the Mayor's intention to introduce policies which protect community assets in Chapter 4 is highlighted and repeated in relation to Policy 2.13 and supporting text, in order that existing assets within areas of London earmarked for high housing growth are not decimated in the process – which is surely not the Mayor's intention.

We also wish to caution against the shift in the FALP towards emphasising new homes over new jobs more generally. In Tottenham generally, and in Seven Sisters specifically, there is a vibrant and specialist local economy that should not be ignored and destroyed by the planning process. The existing Wards Corner indoor market is a major destination for London's large Latin American population (estimated one million) and other visitors from all over London who want to speak their languages, meet friends, let their children play with other families and enjoy live music. It is indeed a place where people linger and spend money. If properly restored and managed, it has even more potential and could attract many more visitors to Tottenham. The Community Plan sets out how Wards Corner could become an even better destination and attraction for the people of Tottenham and London as a whole. The FALP should be reconsidered in order that it doesn't introduce a steamroller that will make it much harder for these sorts of positive and innovative community- and business-led approaches to be introduced. Again, we recommend that firm statements on community and business involvement in plans and developments are included in the alterations to policy and supporting text on Opportunity Areas and Intensification Areas. We also request that the London Plan provides leadership to ensure councils take steps in high growth areas to ensure existing businesses are not displaced but instead have an affordable and sustainable future in any new developments on London's high streets and town centres.

Regeneration areas

Para 2.63A: We do not support the Alteration which says that the overriding objective is "to drive and shape growth" (para 2.63A). The delivery mechanisms outlined are not consistent with the preceding paragraph 2.63. The approach is unlikely to meet the particular needs of the most deprived or of minority groups unless these needs are carefully assessed. The Mayor's funding schemes should focus on these groups more specifically or they risk being the victims of "growth". This indeed is the experience at Wards Corner (see introduction), and we are working hard to provide an alternative through the community plan that would ensure existing users are involved in and

benefit from processes of improvement. We therefore suggest that this alteration is revised to include commitments to working with existing residents and businesses to ensure they benefit from and shape growth, rather than being displaced by it.

Chapter 3: Housing and social infrastructure

Our detailed comments on Opportunity Areas and Intensification areas above apply here to the relevant amendments on housing supply.

Para 3.87A: We are concerned to see amendments which suggest the conditions under which social infrastructure loss may be acceptable. In light of the population forecasts that the FALP aim to respond to, this seems to be a move in the wrong direction. In light of the excessive loss of social infrastructure already taking place – for example, at Wards Corner in Seven Sisters, but also across Tottenham more generally (see the Our Tottenham submission) – it seems totally perverse to introduce this new paragraph. We suggest it is removed, and instead that firmer policies are introduced to protect existing social and community assets – as indeed the Mayor is intending to do in the alteration to Policy 4.8Bc and para 4.48A, which we comment on below.

Policy 3.3: we are concerned that the alteration to encourage housing delivery in town centres with good public transport accessibility will increase the likelihood of existing businesses and traders being displaced through redevelopment and renewal schemes. We have already discussed how this is the risk presently in the case of Wards Corner in Seven Sisters. We therefore propose that additional wording is added in order to prevent this from occurring, in order that vibrant and specialist local economies such as that at Wards Corner can be supported rather than destroyed. The community plan sets out how such an approach can lead to an attractive future at Wards Corner, as discussed in other parts of this submission.

Chapter 4: London's Economy

Overall, we agree with the concerns expressed by the Just Space Economy and Planning group in their submission, regarding the loss of (particularly affordable) workspace in London that the flexibilities introduced by the FALP are likely to bring. We expect this to be keenly felt in areas such as Tottenham, which have a large amount of existing employment land already in use, but will be more vulnerable to loss to housing as a result of the amendments introduced. We refer to the Our Tottenham submission more generally on this point. In relation specifically to Wards Corner, we set out our detailed points below.

Economic context

Para 4.2 and 4.4A: we are concerned to see the strengthened focus here on growth and development, with no reference to economic and social diversity. Wards Corner is a vibrant and ethnically diverse local economy, that attracts local residents and people from all over London. Yet the planning system has thus far not recognised the value of these activities. We refer to the evidence presented in the Just Space Economy and Planning submission regarding the role and importance of ethnic retail in response to Policy 4.7 and supporting text. We suggest there is a need to remove the alterations to the 'Economic context' section unless additional wording is introduced which recognises diversity, and which confirms economic diversity will be supported and promoted in line with the broader duties and responsibilities of the Mayor in particular in relation to equalities and sustainable development.

Para 4.6: The alteration here should be expanded to recognise a greater diversity of sectors as potential future growth sectors. The community plan for Wards Corner sets

out how the existing market and local economy will be linked in with business and community services to support entrepreneurship and small business development, providing jobs and training for local people. London's economic future lies not only in central London or in 'high GVA' sectors such as finance and technology.

Para 4.9A: The alteration here should confirm how small businesses and local business groups can be involved in shaping the approach to economic development in London.

Economic sectors and workspaces

Policy 4.7 and paras 4.40-4.43: We strongly disagree with Experian's assessment of the future prospects of London's retail sector, and refer to the detailed analysis provided by the Just Space Economy and Planning group in their submission.

The existing Wards Corner indoor market is a major destination for London's large Latin American population (estimated one million) and other visitors from all over London who want to speak their languages, meet friends, let their children play with other families and enjoy live music. It is indeed a place where people linger and spend money. If properly restored and managed, it has even more potential and could attract many more visitors to Tottenham. The Community Plan sets out how Wards Corner could become a genuine destination and attraction for the people of Tottenham and London as a whole. However, present plans to re-locate the market occupants risk disrupting individual businesses as well as the 'Gestalt' of the market as a whole and surrounding businesses, in particular through the two-year hiatus caused by the current development plans and the tripling of rents which is expected to result.

We consider that the overall effect of the FALP on London's high streets and town centres will likely reinforce the damaging impacts that places such as Wards Corner have been experiencing due to expectations of redevelopment, that cause uncertainty and prevent investment. We consider that the changes in the FALP risk undermining how economic, social, cultural and physical assets are already connected and mutually dependent and reinforcing in high streets and town centres such as at Seven Sisters. The community plan for Wards Corner sets out a real alternative and exiting future for the area, that we would wish to see supported rather than undermined by the London Plan. We would request to see strengthened commitments to supporting community and business-led plans and to require councils to work with existing residents and businesses to ensure they benefit from and shape growth, rather than being displaced by it.

Policy 4.8 and para 4.48A: We welcome the inclusion of words to support local authorities in guarding community assets against loss. But it is unclear why para 4.48A mentions public houses only - this should be extended to encompass other kinds of community assets, for example, markets (e.g. such as Wards Corner), community centres, etc etc, which also fulfil social and economic roles. There is a lack of precision and clarity in the change to Policy 4.8Bc, namely 'robust evidence'. The scope and degree of evidence is not explained in the supporting text or elsewhere. The change should explicitly mention assets which are listed on the local authorities' register of community assets. WCC have applied to list the Wards Corner site as an asset of community value, and await a response from Haringey Council. We suggest that the Mayor provide leadership on this point and encourage councils to work with communities to list assets and to recognise their strong role in high streets and town centres, working them into their local plans and supporting community planning, ownership and management. Wards Corner provides an example of how an existing social and economic asset can be nurtured through community and business-led approaches.

We also welcome the recognition of the ways in which related facilities and services are connected with supporting a diverse retail sector. The Community Plan for Wards Corner provides an example of how these interconnections can be recognised and supported to grow. The alterations to Para Bg of Policy 4.8 need to be much stronger if they are to support this, in light of the broader thrust of the FALP, as outlined in the Just Space Economy and Planning group response.

New and emerging sectors

Policy 4.10: see comments on para 4.6 above.

Chapter 8 – implementation, monitoring and review

Policy 8.1: This introduces new delivery vehicles, especially for the Opportunity Areas. We are very concerned about this, and very little detail has been provided. We refer to the Just Space submission on this in general. In relation to Tottenham and Seven Sisters specifically, we note that the possibility of new 'housing zone' (introduced in the FALP in Chapter 8) has been publicly floated for Tottenham and the Upper Lee Valley OA (though not explicitly mentioned in the FALP, we see). We would wish to see full public consultation on any such proposal, and would have severe concerns about the relaxation of planning laws on the social, economic and physical fabric of the area, especially in the context of the broader flexibilities introduced by the FALP as discussed above.

Wards Corner Community Coalition
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