

CONSULTATION ON THE TOTTENHAM AREA ACTION PLAN (AAP) RESPONSE FROM WARDS CORNER COMMUNITY COALITION (WCC)

Background on WCC

1. Wards Corner Coalition (WCC) is a broad based coalition of groups and individuals who came together to challenge plans to demolish Wards Corner, a city block in Tottenham. 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, traders organisations, Tottenham Civic Society, Tottenham Conservation Area Advisory Committee, Pedro Achata Trust, Pueblito Paisa Association, Seven Sisters market, Tottenham Traders Partnership, Tottenham and 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.
2. Wards Corner 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. The market was listed by Haringey Council as an Asset of Community Value in May 2014.
3. After extensive work and consultation the coalition has produced an alternative Community Plan which received planning permission in April 2014. The 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. WCC is now working with the West Green Road / Seven Sisters Development Trust to deliver the community plan.
4. WCC's position is that the community plan for Wards Corner is preferable to Grainger's Plan and supports the work of the West Green Road / Seven Sisters Development Trust to implement the community plan as its first project. The comments we provide below relate only to the soundness of the planning framework provided by the Tottenham AAP.

Chapter 1: Introduction

5. It is suggested that the AAP reflects a shared vision and objectives for Tottenham established through the Tottenham Futures consultation and agreed with the community. This is not the case in relation to Wards Corner. WCC responded to this consultation (please cross refer to our response for details of the issues raised) and met with the Tottenham Futures community engagement officer during the consultation period, as recorded on page 32 of the Annex to the Tottenham Futures consultation¹.

Chapter 2: Issues, Challenges and Opportunities

6. We strongly disagree with the way the local economy has been described at paragraphs 2.14 - 2.16 and do not see that any evidence has been provided to support this view. We consider that in this regard the AAP fails to meet the NPPF requirement for local plans to support existing business sectors (para 21) and work closely with the business community and develop a clear understanding of business needs (para 160).
7. For instance, no mention is made of the many strengths and assets in the local economy; how Haringey Council has been working with local business groups to ensure a good understanding of the local economy; nor of the various initiatives underway in Tottenham in relation to local economy. We provide below some detailed suggestions about how these aspects could be addressed in relation to the Seven Sisters / West Green Road Town Centre.
8. A survey of businesses should be conducted for the next version of the Tottenham AAP as the economic evidence base for the local planning documents out to consultation is currently inadequate in light of NPPF requirements. The AAP should be amended in light of this survey.
9. Seven Sisters market (housed in the historic Wards Building at Seven Sisters, and home to one of London's two main markets providing Latin American goods and services) is not referred to in the description of 'Tottenham Today'. References should be added to this at key points in which the High Street and town centres; heritage and cultural assets; and diversity are mentioned i.e. at paragraph 2.4, 2.6, 2.7 and 2.16. Other markets in Tottenham should also be mentioned. This is necessary because the NPPF (para 23) and the London Plan (Policy 4.8) require boroughs to plan positively to support and enhance markets, as well as the more general requirements mentioned above. Additionally, Seven Sisters market has been listed by the Council as an asset of community value; the Council is required by the Further Alterations to the London Plan adopted

1

http://www.haringey.gov.uk/sites/haringeygovuk/files/tottenham_s_future_consultation_report_appendices.pdf

in March 2015 to prevent the loss of 'valued local community assets' (Policy 4.8 para Bc).

10. The importance of small independent businesses to Tottenham's economy is not acknowledged in the description of 'Tottenham Today'. In relation to the Seven Sisters / West Green Road Town Centre, these small and independent businesses that sustain the vitality and vibrancy of the centre. Amendments should be made to set out the Council's vision for small and independent businesses in high streets, town centres and employment areas in Tottenham at relevant places e.g. paragraph 2.4, 2.6, 2.14-2.16. Consideration of small shops is required by London Plan Policy 4.9 and is acknowledged and addressed in other Haringey Council policies and projects.
11. Local business organisations should be referred to in the sub-section on 'Economy' (paras 2.14-2.16), and the council should set out its approach to working with those groups here. Reference should be made to the Tottenham Traders Partnership, Tottenham Traders Group, Federation of Small Businesses, West Green Road / Seven Sisters Development Trust etc. A new section should also be added to Chapter 2 to set out Tottenham's assets in terms of community and business engagement, organising and development, and the Council's approach to working in partnership with community groups and organisations to secure developments that benefit and involve local groups. For example, this should mention the various community groups that are taking action to develop their own ideas and pursue their own projects in Tottenham. In relation to the West Green Road / Seven Sisters Town Centre, this should include Wards Corner Community Coalition, the West Green Road / Seven Sisters Development Trust, Pueblito Paisa Association, Pedro Achata Trust and local residents groups. The London Plan requires boroughs to support and encourage community engagement and business involvement in the management of town centres (Policy 2.15 para Dc3).
12. Paragraph 2.7 describes the ethnic diversity of Tottenham's population. The ethnic diversity of its business community should also be acknowledged. Nowhere in the AAP is it discussed how this has been taken into account. We have been unable to locate the Equalities Impact Assessment mentioned in other planning documents out for consultation online, and have therefore been unable to comment on this. Specifically in relation to the West Green Road / Seven Sisters Development Trust, the Further Alterations to the London Plan introduced by the Mayor in March 2015 include a requirement for boroughs to manage the cluster of uses in town centres having regard to (amongst other things) the 'potential to realise the benefits of London's diversity' (Policy 4.8 para Bgviii).
13. A new sub-section should be added on 'Affordable Workspace' to the section on 'key drivers for change and regeneration'. Haringey Council's recently announced £3.65m Opportunity Investment Fund for Tottenham is based on the understanding that the availability of low-cost workspace will be essential to the sustainable and inclusive development of Tottenham's

economy. This understanding is entirely missing from the AAP and should be included within Chapter 2.

Chapter 3: The vision and strategic objectives for Tottenham

14. Our comments on Chapter 2 apply to Objective 2 (improved access to jobs and business opportunities) and para 3.3. This should be re-written to ensure small businesses, markets, affordable workspace, the contribution of ethnic retailers, local business and community development groups are included and supported within the objective and the policies of the AAP.
15. Objective 6 (great places) and para 3.7 should mention Seven Sisters market and the Wards building. WCC's response to the Tottenham Futures consultation and the community plan for Wards Corner (attached to this submission) have already set out how retaining, refurbishing and bringing back into use Wards building can provide a great town centre at Seven Sisters and West Green Road. Our comments above on Chapter 2 in relation to involvement of local business and community groups in management of town centres and on the role of markets and ethnic retailers also apply here.
16. The Spatial Strategy for Seven Sisters / West Green Road set out at para 3.19 does not convey that there are two planning permissions in place for Wards Corner, which both have been determined to meet planning policy. Yet para 3.19 is written on the basis of the Grainger plan going ahead. Para 3.19 should be amended to provide a more balanced position in line with the Council's role as local planning authority, communicating the vision of the community plan for Wards building as well as that of the Grainger plan for the site. We propose a new sentence is added to this para as follows:

The community plan for Wards Corner, which also has planning permission, would restore the existing heritage buildings at the heart of the town centre, providing affordable workspace and community space and enhancing the existing market to provide a unique destination and gateway to Tottenham.

17. We propose a new sentence is added to para 3.19 to confirm the Council's willingness to work with the community on the future development of the West Green Road / Seven Sisters Town Centre.

Chapter 4: Promoting positive regeneration in Tottenham – policies

Policy AAP1 (Regeneration)

18. A new paragraph should be added to Policy AAP1 (Regeneration) to require that regeneration schemes benefit and involve existing communities, and a commitment to working in partnership with the community to plan, deliver and manage projects, with reference to the

Localism Act and London Plan requirements in relation to the management of town centres.

19. Policy AAP1.E and para 4.8 propose a 'comprehensive' approach to development. We disagree that a 'comprehensive' approach necessarily discounts 'incremental' development (as para 4.8 suggests), nor that the latter is inappropriate for Tottenham. Incremental development can be comprehensive by considering a particular development in its wider context. A step by step approach is better able to include and incorporate existing residents, businesses and community uses than large scale major redevelopment schemes. An incremental approach can build on and support existing strengths and diversity, while large scale major development is more likely to wipe them out. We therefore propose that para 4.8 is re-written to clarify this.
20. Policy AAP1.G on the use of compulsory purchase powers to support site assembly is weak and provides little guarantee that the use of such powers would be in the public interest. Acquiring authorities need to be able to defend their use of compulsory purchase powers in the event of an enquiry and are advised to take certain issues into account when considering use of such powers (para 16 of ODPM Circular 06/2004 on Compulsory Purchase and the Crichel Down Rules). This includes whether use of the powers is in the public interest and whether the reasons for using the powers justify sufficiently interfering with the human rights of those affected (para 17). The ODPM Circular advises that 'the more comprehensive the justification which the acquiring authority can present, the stronger its case is likely to be' (para 18). No mention is made of the public interest in Policy AAP1.G. A vague mention of contributing to the delivery of the Tottenham AAP objectives does not seem to be sufficient or comprehensive. Explicit mention to 'a compelling case in the public interest' was made in the report to Haringey Council Cabinet (dated 15 July 2014) in relation to the potential future use of CPO powers in relation to Wards Corner (para 5.44, page 11). At a minimum, Policy AAP1.G should make a similar declaration.

Policy AAP2: Housing

21. The housing policies within the draft Development Management DPD are not adequate and do not provide a sound basis for the Tottenham AAP. For instance, DM16 and paragraph 3.6 makes no mention of lifetime homes and do not distinguish between different kinds of 'floorspace' (DM16 C) – if existing council housing is knocked down and replaced with private housing, the Council's requirement that an equivalent floorspace must be re-provided is meaningless. This policy is highly likely to remove affordable housing and replace it with unaffordable housing at a time of housing crisis.
22. Policy AAP2 and supporting text does not address the need to alleviate the severe shortage of social housing, nor ensuring that council tenants are not displaced from council estates in Tottenham. Compulsory purchase is

moving former council tenants out of London. There are many cases of this happening all over London (Elephant and Castle, Woodberry Down Estate, Carpenters Estate). There is nothing in any of Haringey's policy to ensure that this does not happen here. Infact the policy approach rather poses a threat to the security of existing Council tenants, with no assurance that they will be able to return. A hugely flawed consultation on the Love Lane estate makes one doubt that this estate will be for the existing tenants after it is rebuilt. Private tenants are also under threat of eviction through major development schemes e.g. at Suffield Road. If there is no mention of social housing then rent rises will price existing tenants out of Haringey.

23. The AAP does not address the problem of high numbers of people in temporary accommodation.
24. AAP2 should provide a policy framework for where tall buildings will be acceptable in Tottenham and the supporting text should provide the evidence base for this. There is currently no policy on this and yet it is likely that Tottenham will be the main location for tall buildings in Haringey – as the draft Development Management DPD says (para 2.28). The Development Management DPD cross refers to the Tottenham AAP (pra 2.29) but no policy is provided here. This is a significant omission because more locations are being earmarked for tall buildings in the Tottenham AAP than are identified in the local plan (Haringey Heartlands/Wood Green and Tottenham Hale). Para 2.29 of the Development Management DPD confirms that tall buildings were found to be 'inappropriate to Haringey's predominately 2-6 storey prevailing heights and character' in all other locations. Without a policy or an evidence base set out in the AAP for other locations having been identified as suitable for tall buildings, the local plan is unsound on this matter.
25. Rebalancing the high levels of social housing in Tottenham (para 4.10) is a euphemism for social cleansing and highly offensive. Council and social housing should not be removed from Tottenham at a time of housing crisis and yet at the moment, the policy approach will mean that this happens. We do not consider that this policy approach has the support of residents and has not come up in public consultations.
26. Attracting wealthier people to live in the area should not requite the removal of existing residents. For example, homes built by Bellway in Lawrence Rd, do not appear to be marketed to residents of Tottenham. They are currently being advertised in China. Therefore it is unclear how this new housing, if it is expensive is going to do anything to alleviate the local housing problem.
27. Delivering 10,000 homes in Tottenham (para 4.9) is not realistic and will place incredible stress on the community, especially given the existing lack of social, community and public facilities and services.

Chapter 5: Neighbourhood areas and opportunity sites

Seven Sisters / West Green Road and Tottenham Green

1. The vision for this neighbourhood is fragmented and weak, in part because it underplays the central role of Wards Corner as the gateway to Tottenham. We provide some suggestions below as to how these problems might be addressed.
2. Our comments on Chapter 2 and Chapter 3 also apply to paras 5.5-5.8: the text should be re-drafted to acknowledge the importance and community value of Seven Sisters market, ethnic retailers, small independent shops and local community and business groups to the town centre, as well as the vision of the community plan for the town centre.
3. In addition, the heritage assets at the Seven Sisters / West Green Road town centre should be acknowledged as they are for Tottenham Green (e.g. the Wards building, 1A West Green Road, etc).
4. We disagree with bullet 1 under para 5.9, which suggests a key objective is to increase retail floorspace at Seven Sisters town centre. The Further Alterations to the London Plan adopted in March 2015 make clear that as changes to retailing impact, it will become increasingly important for town centres to develop distinctive roles. Delivering more retail floorspace without consideration for the likely use of that floorspace goes counter to the policy direction introduced by the Further Alterations to the London Plan (in particular, Policies 2.10, 4.7 and 4.8). Instead, the aim should be to support the development of a distinctive, specialist retail offer, such as that provided by Seven Sisters market, as has been the case in Camden and Brixton, for example.
5. Bullet 2 of para 5.9 should be amended to reflect the fact that refurbishment is also an option for Wards Corner, as well as redevelopment (as evidenced by the two planning permissions in place for the site).
6. Bullet 4 of para 5.9 should extend the aim to provide affordable workspace to Wards Corner as well as Gourley Place and Lawrence Road, in line with the planning permission in place for Wards building.
7. Bullet 5 of para 5.9 about Apex House complementing development on the Wards Corner site should be clear that this is in relation to the two plans with planning permission.
8. An additional bullet point should be added to communicate the vision for the West Green Road / Seven Sisters town centre, as is the case for Tottenham Green.
9. We have concerns about the evidence base in relation to the West Green Road / Seven Sisters town centre, as set out in the Retail and Town Centres study and appendices. These concerns include:

- a. No mention is made of Seven Sisters market in the Retail and Town Centre study, despite NPPF requirements to enhance and support existing markets and the London Plan policies relating to specialist functions, clustering and diversity (see above). On this aspect, the evidence base and the AAP is therefore unsound. Seven Sisters market, as one of only two markets offering Latin American goods and services in London, should be explicitly mentioned in the summary of the High Road on page 69.
- b. The Town Centre Health checks were conducted in 2011, while the financial recovery was still underway. Seven Sisters market remained lively and full during the crisis, but is now reporting a further resurgence. Since then, West Green Road has begun receiving investment through the Mayor's Outer London Fund e.g. new shopfronts and pocket parks. Additionally, the listings of existing uses for the town centre do not include arrivals since 2011 e.g. Sainsburys and Costa Coffee. Being based in 2011, the retail and town centre reviews are out of date.
- c. Description of the town centre as being perceived to be in decline (para 11.2e and 11.3): long-term neglect and uncertainty are important factors here. The community plan for Wards Corner provides a basis for addressing these factors, facilitating the investments and improvements that have been stalled while large scale redevelopment has been on the horizon.

SS3: Apex House and Seacole Court

10. It is not clear why this site has been identified as suitable for a tall building, given it does not appear on Map 2.2 (Locations suitable for tall buildings) in the Development Management DPD and as no policy framework or evidence base is given in the AAP to explain why a different approach is being taken in Tottenham (see our comments on AAP2). The density and height allowable on this site should be clarified with reference to an evidence base, policy and other relevant factors (e.g. flood study).
11. Without prejudice to our comments above, we consider this site allocation does not provide a strong enough vision for such a key strategic site, either in terms of meeting needs of Tottenham's diverse communities; ensuring a high-quality sustainable building; or ensuring a vital and viable town centre as required by the London Plan (see comments on previous chapters). This is especially important in relation to the value of the site and its potential to yield benefits for Tottenham. We propose the following aspects should be mentioned and the relevant policies cross-referred to:
 - a. Need for the highest environmental standards to be achieved
 - b. Need to ensure lifetime homes, mixed communities and affordable housing. (NB it should be clarified in policy that separate entrances for access to affordable homes would not be acceptable)
 - c. Need to reflect and support the culture and diversity of the area

- d. Need to deliver affordable workspace, space for small shops, space for cultural and creative uses
 - e. Need to enhance the public realm
 - f. Need to ensure safety
12. Fifth bullet point under 'site requirements': any proposal should consider its relationship to the proposals (not proposal) at Wards Corner, given there are two plans with planning permission. Cross reference should be made to DM5 (B).
13. Further cross referencing is needed to key council policies relating to tall buildings (DM5 but also DM1, DM2, DM3 and DM6), given this is the first time such a building has been proposed in this area and given the height Grainger are currently considering. A blanket reference to the Development Management DPD does not provide sufficient clarity to developers nor to the community as to what they can expect from any development on this site. If this development goes ahead, this will likely be the first time these new policies allowing taller buildings are tested. There is therefore a need for caution to ensure that a precedent is not set that damages Tottenham's character and strengths. See also out comments on the need for policy and supporting evidence for the Council's approach to tall buildings in Tottenham in relation to policy AAP2. The following policies should be explicitly referred to in SS3:
- a. High quality design (DM1, DM5)
 - b. Privacy (DM3)
 - c. Light (DM2, E)_
 - d. Need to relate to surrounding buildings and heritage – it should be clarified that the building must not be so tall that it cannot relate to the surrounding area (DM2, A; DM5, B)
14. It is not clear why Seacole Court has been included in this site allocation. It should be clarified how any new development at Apex House should relate to Seacole Court – saying new development should 'have regard to properties to the rear of the site' is not clear.

SS5: Wards Corner and Suffield Road

15. WCC's position is that the community plan for Wards Corner is preferable to Grainger's Plan and supports the work of the West Green Road / Seven Sisters Development Trust to implement the community plan. The comments we provide below relate only to the long-term planning framework provided by SS5 for this site.
16. 'Current/previous use' should provide details as to actual usage i.e. indoor market; retail and workspace; community uses; housing.
17. 'Ownership' should include Transport for London.

18. Earlier comments relating to the lack of vision for the town centre. This is a key site for the expression of Tottenham's diversity, its cultural and heritage offer and its strength in small businesses and community activities. The potential arrival of Crossrail 2 to Seven Sisters and the Further Alterations to the London Plan relating to retail and town centres and diversity discussed above make this essential. An additional bullet point should be added to confirm that future development proposals will be required to contribute positively to this vision.
19. We propose some changes to ensure a planning framework for future development that would be consistent and appropriate were either plan with planning permission to be delivered:
- a. First bullet point re: comprehensive approach. It should be made clear that incremental development would be consistent with an integrated approach to the development of this site, as long as the whole site and broader area is taken into account. The community plan for Wards Corner takes this approach and already has planning permission.
 - b. An additional bullet point should be added to the site allocation to ensure that development proposals for refurbishment, restoration, densification or infill in and around existing housing on the site are not ruled out.
 - c. Second bullet point re: Apex House is inappropriate given two plans already have permission for Wards Corner. The site allocation for Apex House requires any plans for Apex House to consider these existing plans for Wards Corner, so the issue of coordination is dealt with through SS3.
 - d. Third bullet point re: re-provision of the existing market. It should be clarified that any re-provision would proceed with the agreement and partnership of existing traders, with particular care to ensure long-term affordability, space to grow and provide community services, units suitable for existing uses, and compensation for moving, fit-out costs, legal fees and investment in business etc². Such commitments are necessary in light of the Mayor of London's commitments in relation to retaining the existing market.
 - e. Fifth bullet point re: conservation area should explicitly mention locally listed buildings and refer to the Council's broader policies and approach to securing the refurbishment of heritage assets along the High Road and more generally

Appendix A

- The community plan for Wards Corner should be included in the monitoring table alongside the Grainger plan.

² WCC's comment in relation to this bullet point should not be read as having any bearing on any material discussions ongoing on the site nor to WCC's continuing commitment to the community plan for Wards Corner. The community plan secures a long-term future for the market without any need for the market to move from the site, as well as delivering a range of other social, economic and environmental benefits.