

Response to Local Plan Consultation by Wards Corner Community Coalition.

1. This response to London Borough of Haringery's (LBH) consultation on the Local Plan: Strategic Policies is submitted on behalf of the Wards Corner Community Coalition (WCC).
2. WCC is made up of people from a wide range of groups including but not limited to: traders from in and around the Wards Corner site, members of the Tottenham Traders Partnership, Members Of Pueblita Paisa traders group, local residents' associations, members of the Just Space Network, Tottenham Civic Society, members of Planning Network UK and many local residents from various professions from teachers to architects, artists to scientists.
3. WCC want to raise concerns about the contradictory and confusing designation of Wards Corner in the Local Plan, the Site Allocations DPD, and the Unitary Development Plan Proposals map.
4. The Wards Corner site forms part of the Tottenham High Rd Historic Corridor, sitting in the Seven Sisters/Page Green Conservation Area. This designation recognises the importance of the heritage buildings there, including buildings 227 High Road (inc. 725 Seven Sisters Rd) and 1a & 1b West Green Road which are locally listed buildings of merit. The Tottenham High Road Conservation Area Appraisal states that numbers 255- 259 High Road, along with the previously mentioned locally listed buildings, are positive contributors to the streetscene and the overall character of the area (Tottenham High Road Conservation Area Appraisal 8.5 – 8.7).
5. Half of the Wards Corner site sits within the Seven Sisters/Paige Green Conservation area and as such is a Designated Heritage Assett.
6. Contrary to this designation SP1 of the Local Plan LBH lists as part of it's aspirations for Seven Sisters Area of Change; *"Wards Corner regeneration delivering houses, shops and public realm improvements through redevelopment and/or renewal"*.
7. Further to this the Wards Corner/Apex House site is marked as a site for Mixed Use Development in the Site Allocations DPD (May 2010)(pg27). This designation references the UDP Proposals Map which shows Wards Corner as both a site for redevelopment and as a conservation area.
8. WCC contend that the Local Plan should give certainty in it's designation of sites to avoid confusion and ensure that development proposals are suitable for the site in question.
9. As such WCC recommend the re-designation of Wards Corner as primarily a *'Designated Heritage Asset'* but also as an *'Area of Limited Change'*, encouraging an historically and socially sensitive incremental approach to renewal of the site.
10. Definition as an 'Area of Limited Change' would encourage proposals for the site to follow the councils guidelines for these areas detailed in SP1 of the Local Plan:
"3.1.47 The Council will ensure that development in the areas of limited change respects the historic significance and character of its surroundings, conserves heritage and other important features and provides environmental improvements and other local benefits, where appropriate.
3.1.48 Major development taking place adjacent or near to areas of more limited change should bring benefits to these areas of an appropriate nature and scale. In particular, the Council will seek:
 1. *Contributions towards regeneration and training in deprived areas;*
and
 2. *The provision of open space and other community facilities where there are local deficiencies"*.
11. WCC also recommend re-defining LBH's aspiration for the site to read:
"Renewal of Wards Corner through historically sensitive restoration and new build, increasing retail and housing provision and delivering public realm improvements" .

12. WCC contend that there is scope for defining Wards Corner as a 'Cultural Quarter' and expanding the designation of the site to include 'creative, leisure and tourism' uses. This would support and expand upon Wards Corners role as a unique retail destination with an exceptionally ethnically diverse population and customer base.
13. WCC believe these changes are justified when considered in light of the following policies in the NPPF and the London Plan (2011) with which the Local Plan should be in general conformity.
14. NPPF paragraph 17:
"conserve heritage assets in a manner appropriate to their significance, so that they can be enjoyed for their contribution to the quality of life of this and future generations".
15. NPPF paragraph 126:
"Local planning authorities should set out in their Local Plan a positive strategy for the conservation and enjoyment of the historic environment, including heritage assets most at risk through neglect, decay or other threats. In doing so, they should recognise that heritage assets are an irreplaceable resource and conserve them in a manner appropriate to their significance. In developing this strategy, local planning authorities should take into account:
- *the desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation;*
 - *the wider social, cultural, economic and environmental benefits that conservation of the historic environment can bring;*
 - *the desirability of new development making a positive contribution to local character and distinctiveness; and*
 - *opportunities to draw on the contribution made by the historic environment to the character of a place".*
16. NPPF paragraph 23 (excerpt):
"retain and enhance existing markets and, where appropriate, re-introduce or create new ones, ensuring that markets remain attractive and competitive".
17. London Plan 2011 Policy 7.4:
"Strategic:
Development should have regard to the form, function, and structure of an area, place or street and the scale, mass and orientation of surrounding buildings. It should improve an area's visual or physical connection with natural features. In areas of poor or ill-defined character, development should build on the positive elements that can contribute to establishing an enhanced character for the future function of the area.
- Planning decisions:**
Buildings, streets and open spaces should provide a high quality design response that:
- a has regard to the pattern and grain of the existing spaces and streets in orientation, scale, proportion and mass*
 - b contributes to a positive relationship between the urban structure and natural landscape features, including the underlying landform and topography of an area*
 - c is human in scale, ensuring buildings create a positive relationship with street level activity and people feel comfortable with their surroundings*
 - d allows existing buildings and structures that make a positive contribution to the character of a place to influence the future character of the area*
 - e is informed by the surrounding historic environment.*
- LDF preparation:**
Boroughs should consider the different characters of their areas to identify landscapes, buildings and places, including on the Blue Ribbon Network, where that character should be sustained, protected and enhanced through managed change. Characterisation studies can help in this process".
18. London Plan Policy 7.8 (excerpt):
"Planning decisions:
C *Development should identify, value, conserve, restore, re-use and incorporate heritage assets, where appropriate.*

D Development affecting heritage assets and their settings should conserve their significance, by being sympathetic to their form, scale, materials and architectural detail.

LDF preparation:

F Boroughs should, in LDF policies, seek to maintain and enhance the contribution of built, landscaped and buried heritage to London's environmental quality, cultural identity and economy as part of managing London's ability to accommodate change and regeneration.

G Boroughs, in consultation with English Heritage, Natural England and other relevant statutory organisations, should include appropriate policies in their LDFs for identifying, protecting, enhancing and improving access to the historic environment and heritage assets and their settings where appropriate, and to archaeological assets, memorials and historic and natural landscape character within their area".

19. In Conclusion WCC recommends the following changes to the designation of the Wards Corner Site:

- De-designation of Wards Corner as an 'Area of Change'
- Retention and increased emphasis on Wards Corner as part of the Seven Sisters/Paige Green Conservation Area
- Designation of Wards Corner as an 'Area of Limited Change'
- Redefine LBH's aspirations for Wards Corner to read:
"Renewal of Wards Corner through historically sensitive restoration and new build, increasing retail and housing provision and delivering public realm improvements"
- Encourage Wards Corners development as a 'Cultural Quarter' and a site for 'creative, leisure and tourism' use.

Sincerely,

Wards Corner Community Coalition

for all arising correspondence please use: WardsCornerCommunity@riseup.net