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London  
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Mr Sadiq Khan  
New London Plan  
GLA City Hall  
London Plan Team  
London  
SE1 2AA

2 March 2018

Dear Mr Khan,

**Re: Midtown response to the Draft New London Plan Consultation**

On behalf of the Business Improvement District Bee Midtown, I'm writing with regards to the proposals which have been put forward in the Draft New London Plan. Bee Midtown is a Business Improvement District (BID) which currently represents over 400 businesses within the EC1 and WC1 postcode areas. With the aim of making Midtown the best place to do business in London, the area has transformed from a simple thoroughfare between the City and the West End to a vibrant commercial hub that is vital contributor to London's social, cultural and economic development.

**Housing and Planning**

Midtown understand that one of the biggest challenges which local authorities across London face is a shortage of housing. This problem is exacerbated in areas such as Islington and Camden, which are densely built.

However, there is capacity to develop in Midtown further. In order for this area to continue to regenerate and grow the planning process should aim to be open to investment, easy to navigate and balance the need to maintain the character of an area with the opportunity to bring in new jobs and prosperity for the local community.

Crossrail will make Tottenham Court Road the busiest station on the line and Farringdon will connect to all the major London airports. We will work with developers, local authorities and residents to ensure that development use sites as efficiently as possible and keep to the character of the area. However, in order for the development potential of the BID to be realised we are keen to work with relevant boroughs and City Hall to ensure the planning process is as open to investment and easy to navigate as possible.

We welcome the Mayor's proposals to remove the density cap. Midtown agree that a key way in which housing shortages could be addressed is via the relaxation of planning regulations which restrict the height of new buildings. With land space being increasingly scarce, building taller housing blocks provides an effective solution to the lack of sites in places such as Camden and Islington.

At present, planning regulations surrounding the height and density of building in the area are stifling commercial growth. This is a particular issue in the Farringdon and St Paul's area, where buildings have the additional burden of having to comply with protected views

guidelines. We believe that these regulations should be reviewed in line with London's fast-changing built environment requirements.

## **Public realm and Infrastructure**

Once the Elizabeth Line is introduced at Tottenham Court Road and Farringdon 200,000 passengers will travel through every day. Due to this our public realm and transport networks, will face immense pressure.

We believe that businesses have a responsibility to their local communities to invest to improve the area and stimulate further growth. We support the continued imposition of the Community Infrastructure Levy and the s.106 Levy and believe that they should be used to ensure that crucial infrastructure projects continue as planned.

As vehement supporters of the West End Project, we believe that the continuation of this project is absolutely vital. With the introduction of Crossrail, the Tottenham Court Road and New Oxford Street area will undoubtedly become even busier. Consequently, this will increase pressure on the transport and public realm. Midtown support the proposals to mitigate this by pedestrianizing parts of the area and creating designated cycle lanes and two way traffic on Tottenham Court Road and Gower Street all to help relieve the area of congestion.

Neighbouring projects, including the Holborn Station upgrade and plans to move ahead with the Holborn Gyratory, are also crucial to improving the lives of public transport commuters and cyclists. We support the ongoing work by Transport for London to improve capacity in the local area. In alignment with the Mayor's commitment to the Healthy Streets Approach, these projects will help relieve congestion and make central London cleaner and easier for cyclists and pedestrians.

## **Transport**

We welcome the Mayor's Healthy Streets Approach and will continue to advocate cycling and walking as key ways getting around London. As part of this, we will work with our members to encourage investment in public realm infrastructure which facilitates this.

Midtown are highly supportive of the Mayor's commitment to cycling and are keen to work with his office and Transport for London to achieve his goal of 80 per cent active travel by 2041. We have already undertaken various measures to help promote cycling in Central London. Our Midtown Cycle Vault in Bloomsbury Square offers 24-hour access to bike racks, showering facilities and lockers which are monitored by staff and CCTV around the clock. This project was match-funded by Transport for London.

The continued expansion of cycle-hire schemes around London have proved to be highly popular with Londoners and tourists alike. We support this investment; however, we have some concerns surrounding the regulation of non-docking cycle-hire schemes. Whilst we understand that they provide more flexibility to commuters, we believe that aspects of their licenses should be reviewed. Namely, the Mayor should work with local councils to regulate the areas where they can be parked and the number of them which can be parked in one place. This can prevent pavements from becoming too cluttered in areas with high footfall.

## **Digital Infrastructure**

Our BID is home to a large number of tech and media businesses, ranging from start-ups, to large companies such as LinkedIn. As such, we believe that having a strong, functional digital infrastructure is crucial to the success of our BID. We welcome the Mayor's commitment to

improving London's digital infrastructure in order to ensure that businesses can benefit from fast, reliable connectivity.

Midtown welcome the Mayor's proposals to work with providers and developers to help increase internet capability and extend the fibre network across London. Moreover, as central London becomes increasingly busy, we are keen to work with the Mayor to develop plans on how the mobile connectivity network's capacity can be improved to cope with the greater demand.

We hope to be able to continue work with the Mayor, Transport for London, and local authorities to remove barriers to the speed of broadband and mobile data within the BID.

## **Licensing**

Our members and new businesses are keen for their employees to be able to socialise within the area as well as take opportunity of the great transport infrastructure and location that Midtown offers. We believe there is a balance that can be achieved which supports the evening and night-time economy but also respects the local community.

### Camden

There is a considerable opportunity to increase the evening and night-time economy in Midtown. We welcome the Mayor's commitment to protect London's reputation as a hub for social activity. As retail footfall continues to decline in the Holborn and West End area, there is huge development potential for more sites to be used as space for leisure and hospitality venues. In doing so, we hope that this will help to increase dwell time and local spend for the borough's economy.

We are keen to work with the Mayor, Camden Council and local police forces to develop the most practically viable plans which will encourage a greater number of leisure and hospitality venues to open in the area.

### Islington

Conversely, whilst Farringdon is renowned for its thriving night-time economy, we believe that the area is not fulfilling its potential in regard to its evening economy offering as a result of stringent licensing policies in the borough.

We believe it's important that Islington Council take a more flexible approach on the Clerkenwell cumulative impact policy. Midtown members from across Farringdon and Clerkenwell have raised issues about obtaining the appropriate licenses – with restaurants and members clubs being refused later licenses or drinking establishments being asked to serve food with alcohol in order to be able to operate.

At present, this policy stifles potential growth in the area and we believe a more flexible approach could be taken, to allow the area to thrive as a social environment which is more in line with the Mayor's plan for the night time economy. More work should be done to by the way of licensing deregulation to encourage more non-vertical drinking establishments to open up in the local area and have a greater combination of the types of licensed premises which are allowed to operate.

## **Crime**

Midtown is an area with low crime levels. However, as with various Central London locations, mobile phone thefts have become increasingly common within the area. We are currently

working with local police to draft measures to tackle this, in addition to working with leisure businesses in the area on the implementation of measures to help protect customers.

In Islington, the cumulative impact areas have been successful in reducing crime, antisocial behaviour and ambulance call-outs across the borough. Our work in previous years has contributed to a 9 per cent fall in calls to police about anti-social behaviour and a 24 per cent fall in calls to the Council's out of hours anti-social behaviour team. We will continue to work with the police, the Safer Streets team and Islington to maintain this.

Similarly, throughout our time working with Camden Council, crime has reduced by 25 per cent in the area. We hope to continue to work with the Metropolitan Police and Camden to keep the area a safe place to work and socialise.

More broadly, we are working with homelessness charities, local authorities and local police to implement measures which crack down on professional beggars and safeguard the wellbeing of vulnerable homeless individuals.

### **Midtown within the community**

As a responsible member of the business community, Midtown believe that it is the civic duty of the BID and its members to make sure that they build strong, symbiotic relationships with the communities which they operate in.

As an example, when local skills and job opportunities was raised as an issue by local councillors we established the Step-Up Fund which supported local community groups by providing employment related training projects for residents. Further, our Jobs Brokerage project gained widespread support amongst our members for apprenticeships and work experience placements at their organisations. We will continue to look for opportunities to work with the council and the local community.

At a time when business or developers can often be put against each other Midtown will work to bring local politicians, the private sector and the local community together to better understand concerns and to help the area reach its full economic and social potential. We aim to balance enhancing the growth and prosperity of the area while still preserving the character celebrated by those already here.

The unrivalled transport networks, attractions and location of Midtown means the BID has the opportunity to be a commercial beacon for central London. We look forward to continuing working with City Hall and other interested stakeholders to ensure we are maximising the economic potential of this vital business hub.

Best

Yours sincerely

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Bee Midtown Chief Executive