

## Response to the Draft London Plan Camden Town Unlimited and Euston Town Business Improvement Districts

### Overview

On behalf of Camden Town Unlimited and Euston Town Business Improvement Districts – referred to here as ‘the BIDs’ – we are delighted to respond to the draft London Plan (“draft Plan”). We represent the communities of Camden and Euston in making the areas a better place to work, shop and visit, promoting local economic growth, regeneration and innovation. Our submission prioritises key issues such as the development of strategic commercial hubs; the availability of affordable workspace; and the delivery of major infrastructure projects.

We recognise that this draft Plan marks a departure from previous documents and reflects a more holistic approach to planning the growth of the capital. We are particularly encouraged by the accessibility of the document, its scope and its ambition, and believe that it communicates to a wider stakeholder audience – as opposed to previous iterations focusing squarely on the development of the built environment.

The vision of this draft Plan – and its good growth principles – rightly prioritises a growing city, with a population increasing by 70,000 a year. It ambitiously targets 66,000 new homes by 2041, as well as better jobs and career opportunities. This is welcome, but we are keen to ensure that equal focus is given to supporting London’s businesses, particularly its community of SME and start-up companies which depend on their location in the capital.

Simon Pitkeathley, Chief Executive of the BIDs

March 2018

### Good growth policies

This section focuses on Chapter 1 of the draft Plan, specifically the six Good Growth policies that it outlines. Below, we offer commentary on each in turn:

- **Policy GG1 Building strong and inclusive communities** – Both of our BIDs sit within the London Borough of Camden. Our BID jurisdictions in Euston and Camden Town reflect the fact that thriving business clusters exist within the Borough.
- **Making the best use of land** – We welcome the fact that Euston, specifically, is recognised in the draft Plan as an Opportunity Area but we are keen to ensure it is offered support by GLA and central government when the construction of HS2 and Crossrail 2 starts at Euston Station.
- **Creating a healthy city** – We believe that the Healthy Streets Approach could be potentially transformative from a public health perspective. The BIDs are also supporting efforts to reduce health inequalities with the delivery of London’s own Highline.
- **Delivering homes Londoners need** – New homes for the capital are overdue, although our understanding is that the Mayor’s ambitious affordable housing targets, alone, will not offset efforts to increase floor space for the capital’s businesses, particularly its SMEs.
- **Growing a good economy** – We believe that the foundations of growth in London rest on its community of business clusters, both in central, inner- and outer- city areas. Representing a key hub in Camden, we are keen to explore with the GLA how Good Growth can be harnessed locally.
- **Increasing efficiency and resilience** – SMEs, ‘start-ups’ and ‘micros’ are the backbone of the capital. We support the entrepreneurs behind this thriving community through the provision of affordable and flexible workspace, offered on a ‘meanwhile’ basis.

### **Planning London's Future: A local perspective**

We believe that growth in London is driven by its community of business clusters, both in central, inner- and outer- city areas. For our own part, we represent a network of local firms in Camden and Euston, and help them make the area a better place to work, shop and visit.

From our perspective, our local BIDs have been a driving force for positive local change and we believe there is scope to do so much more. We are keen to merge the business clusters in Euston and Camden with commercial pockets in and around King's Cross, an area where we do not currently represent members, to form a 'London Innovation District'.

Our teams currently operate through two distinct but collaborative BID frameworks – Camden Town Unlimited and Euston Town – and we are therefore accountable to two separate voting constituencies.

Extending our boundaries to the King's Cross area, and then bringing all three jurisdictions into a single federation, would see us represent a significant area of opportunity, including two major national train stations, a healthy academic and scientific community and of course the various business clusters in the area.

Already, these parts of London are diverse and innovative; companies have clustered in the creative hub of Camden Town, the strategically important Euston Station area, and in the Granary Square area behind King's Cross which is now home to the UK Google headquarters.

The draft Plan identifies Euston itself as an Opportunity Area – with the proposed redevelopment of the station acting as a catalyst for growth. It also recognises the need to redevelop what it refers to as the 'outdated' Euston Station to accommodate the southern terminus of HS2 and, further into the future, to establish a Euston / King's Cross St Pancras 'superhub'.

Yet the station is the catalyst for other developments in the area as well as the exciting things going on around it. For example the Euston Road is a growing hub for the global life sciences industry, and together with Cambridge and Oxford, it forms the MedCity triangle.

In Camden, we are pioneering the development of a 'Highline' for London, providing a healthy and green thoroughfare to King's Cross (and we consider this in more depth later in this response). Like New York's own High Line, this would be funded by a grassroots campaign using an innovative crowd-sourcing model.

This all shows that as BIDs we have been able to effect a huge deal of change locally in terms of regenerating our high streets and shaping local debates on transport and infrastructure. But we think we can do more, with our local partners and neighbours.

As such our BIDs have worked with partners at the Knowledge Quarter – a cluster of 35 academic, cultural, research, scientific and media organisations based in the local area – and Camden Council, to develop a base of evidence to support the concept of such a partnership, spanning the three highly significant business hubs in Camden Town, Euston and King's Cross to maximise growth while offering protection for the SMEs and start-ups which currently thrive in the area.

A London Innovation District, covering Euston, Camden and King's Cross could coordinate local developments and drive economic growth. We believe it is a huge opportunity to deliver good growth and we are very keen to develop this dialogue further.

### **Green Infrastructure and the Natural Environment**

We are delighted that the draft Plan encourages the development of an integrated network of green space in London; promoting health and wellbeing, as well as alternative and more sustainable ways of getting around the capital.

Specifically, the BIDs are fully supportive of the Mayor's aim to make London at least 50% green by 2050. In addition we are extremely encouraged by the Mayor's recognition of green and open spaces as a 'vital component of London's infrastructure'.

It is in keeping with this theme that the BIDs have pioneered the development of a London Highline: a green route between Camden and King's Cross. Not only will this deliver more green space for the capital, it could also be transformative in terms of how we think about infrastructure in the future.

The concept is simple: we want to link the iconic markets of Camden Town with the world class transport infrastructure at King's Cross, via a green and sustainable transport link that is open for, and used by, everyone.

This is ambitious but realistic. This is a crowd-funded project, paid for by local advocates who are enthusiastic about the proposal. The progress that we have made to date has showed us that the Highline will be sustainable, both in terms of funding and delivery.

There are precedents. Over five million people a year visit New York City's High Line and this project seeks to replicate that success in our local area. In London, we think this can attract tourists, unlock local growth and regeneration, and connect pockets of the capital with a direct and green thoroughfare.

Furthermore, our proposal is efficient and sustainable; it would bring to life the disused railway bridges and track that runs through Camden with greenery and spectacular views for users. Currently there is nothing like it in the capital, but it could be a major point of interest for anyone visiting the city.

We therefore think that our Highline projects ticks many boxes for London, and we are extremely grateful for the support that the Mayor's Office has already pledged to our proposals – both financially and politically. Most importantly, we are keen to ensure that the Highline works for all of the capital.

London's Highline in Camden could blaze a trail in terms of the 'green infrastructure approach' outlined in this draft London Plan. We hope to continue to work in partnership with the GLA and a range of other stakeholders across the capital as the project moves forward.

### **Transport and the Euston Opportunity Area**

As we have noted in other sections of this submission, we are keen to promote alternative methods of transport and support the Mayor's efforts to rebalance the transport system and to reduce Londoners' dependency on cars – in this respect the Highline will be transformative.

Yet we are under no illusions that the capacity and connectivity of London's wider transport network must be upgraded. From the perspective of our members – our key priority is to make the most of the opportunity to redevelop Euston Station.

To modernise Euston, the station should better serve its neighbouring community and accommodate the new capacity and connectivity offered by High Speed 2 and Crossrail 2. In short, we can make this happen by making the station more accessible both to pedestrians and to the wider rail network, via HS2 and Crossrail 2.

Many of the BIDs' members operate in and around Euston Station, and a significant number of these are located to the north of its current site. In its current form, the station 'faces' south, is a major pedestrian access point and directs pedestrians towards the busy Euston Road, and across to Bloomsbury.

We therefore believe that the station must be reconfigured so that it better serves the businesses operating to the north, east and west of the current site in the communities of Euston, Camden and King's Cross. Furthermore, it can advance its connections with the wider transport network by incorporating Crossrail 2.

Our BIDs are highly supportive of Crossrail 2, and its proposal to incorporate a Euston-St Pancras hub station. We believe that this will be transformative infrastructure which will unlock new pockets of London and vastly extend opportunities in terms of business growth and job creation.

The interchange would also open new pools of demand from potential day visitors and widen the labour market able to work in Euston and Camden's business community by connecting the area to Hertfordshire and Surrey. Furthermore, underground pedestrian connectivity between the 'classic' Euston site and King's Cross St Pancras will bring safer and more direct walking routes between the two stations.

An interchange station serving Euston and St Pancras could also help alleviate congestion points on the Northern Line in Camden which are costly for local businesses. If the Euston – St Pancras interchange were designed to provide access to the north of Euston Station, it could give passengers an alternative route for accessing the area, removing the reliance on an already overly-congested Camden Town Underground Station.

While the funding package for Crossrail 2 is yet to be agreed, ET and CTU believes that any extension to the BRS that was used to pay for Crossrail 1 could be very damaging to the capital's Business Improvement Districts. Firms already contributing to a BID levy would suffer a double hit. The BRS unfairly targets business tenants in the capital that already contribute to local regeneration programmes through their BIDs.

Business rates in London are unpopular and should be reviewed. Extension of the BRS for a long-term project such as Crossrail 2 would be misguided as business tenants will be paying more without a return in the short-term.

In short, Euston will soon be London's prime gateway to the North, Midlands and Scotland, and given its proximity to St Pancras International, will also act as a gateway between these regions and Europe. As such, Euston's redevelopment is a once in a generation opportunity and we are keen to work with GLA to ensure that the Government gets it right.

### **Growing a Good Economy and Making the Best Use of Land**

London is facing considerable business capacity challenges in the coming decades. Projections suggest there will be an increase of 619,300 jobs by 2041. This could translate into demand for between 4.7 and 6.1 million sqm of office floor space over the period 2016 to 2041. Within the Borough of Camden, as is the case for much of inner-city London, the affordability of housing and workspace is a major issue which threatens to constrain future economic growth and increase unaffordability and disparity in the area.

We represent initiatives involving the use of ‘meanwhile space’ where land earmarked for development can be temporarily turned into a co-working environment. The BIDs therefore welcome the policies contained within the draft London Plan which would represent a major step forward in the policy framework to support the provision and protection of both affordable and low cost workspace and will have a significant positive impact.

The evidence of the benefits of meanwhile use are well-established, that being surrounded by like-minded, talented individuals and teams really benefit creatives in the short and long term, giving them the opportunity to build their network and share vital skills and experience. We therefore fully support the intention of policy E8 C as flexible and affordable workspace is critical to supporting the start-up economy, and should be at the heart of ‘making the best use of land’.

Whilst we support the intention of much of chapter 6, there is far more detail required to ensure the vision is progressed. The chapter sets out a framework with a number of qualifying points which require clear and firm definitions, without which local pressures may result in the inconsistent application of strategic principles. We will now assess specific recommendations from the Plan.

#### *Policy E3: Affordable space*

Part A of Policy E3 states that planning obligations may be used to secure affordable workspace in circumstances where there is a social, cultural, or economic development purpose but there is no indication how these characteristics will be assessed. Moreover it is important to be aware that spaces may carry out a number of these objectives and they are not mutually exclusive, or exhaustive.

In order to help identify if the criteria of policy E3 part A is met we would suggest utilising an accreditation scheme for affordable workspace providers offering community impact, with an outline criteria and scoring system. This could be useful in helping to define whether a workspace adds value and addresses market failures. It could also be used to monitor the extent to which providers are delivering on their social, cultural, or economic development commitments.

Policy E3 Part B is clear that affordable workspace can be sought in particular places. We welcome the identification of the City Fringe and CAZ, where values are highest and provide significant affordability challenges for business, as suitable locations for local affordable workspace policy. We also support the designation of Creative Enterprise Zones and encourage the development of local policies in respect of workspace in these areas.

We support the intention of Policy E3 Part C – that Councils should be “encouraged to consider more detailed affordable workspace policies”. However, more thought should go into how Councils can clearly set the objectives and purpose of different kinds of affordable workspace.

This is because affordability (and rents) can vary between them, and developers may have a preference for providing higher value affordable spaces in areas where there is also a need for lower value affordable workspaces. The London Plan currently says they “may”.

*Policy E2: Low-cost business space*

We strongly support the draft Plan's intention to help retain viable office capacity. For instance, the use of Article 4 Directions to suspend Permitted Development Rights and to ensure that planning permission is required, are a particularly effective tool.

In areas outside the City Fringe and CAZ, these exemptions can be used to retain the supply of workspace, and ultimately, employment. To help ensure this remains a reality we would encourage the GLA to monitor Article 4s, and to act strategically by proposing areas where Boroughs might look to bring forward such Directions.

We are also supportive of Policy E2 Part B which states in areas of an identified shortage of lower-cost space there are strict requirements placed on development proposals, with the intention of ensuring the future provision of B1 working space on the site itself or at an alternative location.

However, we are unclear what mechanism or tool the GLA and Boroughs will use to identify areas that meet the criteria of lower cost business space. Strong guidelines will be required to ensure this intention is fulfilled and to provide consistency across London and clarity for developers.

With regard to policy E2 Part B3, we believe it would be helpful to define "reasonable proximity" as within one or two miles, as many small businesses are dependent on a network of staff, suppliers and customers, which risk being broken if they have to relocate a substantial distance, putting the continuity of the business at risk.

**Inclusive growth**

Finally, there are a number of factors that could inhibit the economic and social potential of our local area. These fall within the proposed London Innovation District boundaries we outlined at the start of this consultation response.

Using the Index of Multiple Deprivation (IMD), of the 17 small areas which make up the proposed LID, only 2 score above average in terms of deprivation, the remaining 15 areas are within the top 30% most deprived areas in the country.

Whilst all inner-city locations tend to score poorly on both crime and living environment, LID scores particularly badly. Indeed, 8 of the local areas within the LID are in the 10% most deprived areas for crime, with a further 4 in the bottom 10-20%. Similarly, 8 of the local areas are in the 10% most deprived areas for living environment, while a further 6 are in the bottom 10-20%.

The proposed LID already hosts a truly diverse range of businesses. However, we are keen to ensure that vision outlined in the draft Plan – "to provide the best environment in the world in which to do business, so that businesses of all different sizes and sectors can reach their growth potential" – is fully realised.

More emphasis needs to be on improving specific areas where the IMD reflects that the LID is performing particularly badly in contrast to other local areas. As described above, these areas include crime, living environment and employment.

Against the backdrop of public funding cuts, one solution to help provide the funding to help support improvements in the area is a Tax Increment Funding (TIF) scheme.

Research prepared by Volterra Partners shows that a TIF would capture incremental increases in business rates in the LID to fund projects which are essential to the area, supporting future growth.<sup>1</sup>

That borrowing would then be repaid by future uplifts in the business rate base of the area. One of the prerequisites of a TIF is that the area in question has to be where substantial business rate growth is a realistic prospect. For the LID, there is significant growth planned in the area.

It is estimated that 4,700-5,600 additional jobs will be supported within the LID through developments already completed and under construction and a further 5,500 jobs are likely to be accommodated in future through permitted/proposed development. This would represent a 16% increase in employment and between £0.7bn and £0.8bn in additional GVA per year.

The Mayor of London should therefore commit to reviewing the potential for a TIF to increase and improvement within a defined area, especially where there is clear evidence of need but also the potential for significant future economic growth. Both are the case in the LID.

#### **About Camden Town Unlimited and Euston Town**

Camden Town Unlimited is the Business Improvement District for the Camden Town area representing more than 300 member businesses. The organisation has been appointed by the business community to improve the area as a place to work, live and visit. CTU is entirely accountable to its members and reports to a board of local business leaders. Its partner organisation, Euston Town BID was elected by the companies operating in and around Euston Station with a mandate to drive regeneration and local economic growth. ET was proposed, and is currently run by, the team that leads CTU. The two BIDs work together with shared aims on the issues affecting business in their area. Simon Pitkeathley is Chief Executive of the BIDs and is contactable using [simon@camdentownunlimited.com](mailto:simon@camdentownunlimited.com) or on 020 7380 8260.

---

<sup>1</sup> Securing Camden's Inclusive Growth, Volterra Partners, January 2018  
<https://static1.squarespace.com/static/59f6027fbff200243459c59e/t/5a72dbf853450a892ab217f4/1517476870281/Camden+Enterprise+District+-+Securing+Camden%27s+Inclusive+Growth.pdf>