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Dear Patrick

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# RE Camden Affordable Workspace Strategy

We write on behalf of the London Property Alliance (LPA), in respect of the final draft of the Affordable Workspace Strategy. This document comprises a summary of feedback in relation to this draft.

The London Property Alliance (LPA) is a not-for-profit membership body bringing together leading developers, owners, investors and related property professions across central London’s Commercial Activity Zone (CAZ), providing a unified voice for the built environment. The London Property Alliance includes a Camden Working Group of key landowners and developers in Camden and a Knowledge Quarter Liaison Group of those members most active in the Knowledge Quarter Innovation District whose members comprise the following:

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| **London Property Alliance: LPA members of the Knowledge Quarter Liaison Group and Camden Working Group**  **Argent** -Robert Evans/Alexandra Woolmore  **British Land** -Michael Meadows  **Derwent London** – Richard Baldwin  **Gerald Eve** – Lisa Webb (Chair) and Alex Neal  **Groveworld** – Ross Jacobson  **JLL** –Charles Pinchbeck  **Landsec** –Mike Nesbit  **Lendlease** – Phil Gould/Jenny Sawyer  **Moorfields Eye Hospital** – Kieran McDaid  **Precis**  – Faaiza Lalji  **Reef Group** - Peter Langly-Smith  **Stanhope** – Charles Walford  **St George** - Greg Tillotson/Claire Hammond |

**Feedback overview & key points**

* Welcome flexibility: This strategy seems flexible, holistic and well rounded. The S106 approach outlined and based on hierarchy of priorities with a flexible site-by-site approach is welcome but we are keen to see how this flexibility will flow through to policy and guidance.
* Viability testing and pressures: We would be interested in seeing the viability testing for this policy in due course, and in particular, it would be good to understand the impact it will have on development viability, especially when considered against the other Council’s s106 priorities (especially affordable housing) as well as CIL. This strategy is clearly (and rightly) focussed on securing the right affordable workspace opportunities across the borough but doesn’t really consider or acknowledge those competing pressures.
* Case by case: While we welcome the recognition that a ‘one size doesn’t fit all’ approach, it could be more effective if numbers are replaced with a working benchmark for significant commercial development schemes and negotiate with developers on a case-by-case basis. As previously mentioned, this is going to cause issues for viability / deliverability of schemes.
* Payments in lieu: We welcome the idea of a payment in lieu element to delivering affordable workspace as part of new development (appreciate this is just commitment to explore it at this stage).  Not all sites may be suitable to accommodate affordable workspace on site and therefore payment in lieu could help Camden deliver some really great affordable workspace (e.g using Camden assets) as opposed to lots of small token offers in new developments.
* Use classes: Given that the proposed definition of affordable workspace includes references to social and cultural development, would be good to get some clarity on which Use Classes Camden expects to see affordable workspace comprise. It appears to be going beyond just ‘employment’ uses.
* Evidence base: Would be good to see the evidence underpinning the policy. Expectations around quantum of space and rent reduction seem high, so it would be good to see the evidence for this.
* Workspace providers: Can there be more flexibility on the workspace provider list as outlined previously?

* Bespoke approach: Is required for the Knowledge Quarter. The strategy acknowledges the requirement for lab space and the importance of this being clustered, but due to the high development and operational costs associated, it would be helpful to understand how Camden will deliver and manage this as they potentially will have to be heavily subsided or a partnership with an operator will be required.
* Items for inclusion: It would be helpful if the document included clearly defined types of affordable workspace Camden will be delivering, where Camden is planning on delivering affordable workspace and the type within their own estate.
* Final thoughts: What help / incentives will exist to encourage SME to grow and move into the private market once at scale?

-Ends-

If you require any additional information or clarification on the above, please do not hesitate to contact me.

Yours sincerely,

Charles Begley

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