

Planning Development
London Borough of Camden
2nd Floor
5, Pancras Square,
London
N1C 4AG

August 28th 2018

Dear David Fowler,

**Ref: Planning Application 2018/3553/P Camden (Buck Street) Market 192-200
Camden High Street, London. NW1 8QP**

I am writing to object to the above planning application and please see my comments below to outline my reasons why.

I would strongly argue that the proposed development of container based structures does not constitute a "market". What is actually being proposed is an oversized box park shopping mall with all the businesses under the control of Labtech which is owned by one individual billionaire.

The consultation with the existing traders has also been woefully inadequate. Communication is virtually non-existent and existing traders are being treated disparagingly and at worse evicted.

In a previous approved planning application 2017/3343/P it states
"The council would not allow the loss of the market in any redevelopment schemes".
It is stated that the containers will contain "market stalls" but in reality it will be small retailers operating out of "container retail units". These so-called "independent retailers" will be monitored and controlled through Labtech mandatory iPads and payment system in the same way it currently operates at the Camden Lock & Stables Markets. All payment transactions are logged and data collected for Lab Tech benefit. Also in a lot of cases the "independent businesses" are businesses owned by Labtech themselves.
I should like to point out that the definition of an Independent Business is a business that is free from outside control.

In addition, in the Planning Statement Development Proposals it states the following -

Point 4.4 - *"it is anticipated that the majority of traders would be independent retailers though the larger units facing the high street may be occupied by multiples"*
Point 6.13 - *"The large containers on the high street are likely to appeal to multiples."*

In the initial interviews in early August with the existing traders, Labtech market management suggested Nike and Adidas as potential multiples and as "anchor stores".

I would argue that the presence of high street multiples at this site is most certainly NOT in compliance with this site being used as a market.

Allowing the introduction of high street multiples at this site would contravene the Camden Local Plan Policy TC6 Markets, where it states "The council will promote and protect the markets in Camden".

Point 6.14 - *"Make the market more consistent with those at Camden Stables & Camden Lock to align with "visitor expectation".*

I would argue that visitor expectation is to see independent free traders in an open market selling an eclectic, diverse and an original range of products. It is not to see traders duplicating what is already at the Camden Stables and Lock Market, which is currently considered to be a homogenised and sanitised Labtech shopping Mall.

Point 6.16 - *"Tenant and customer demand for new small independent retailers which sell authentic products"*

Labtech has already evicted tenants selling authentic products and replaced the same business model with a Labtech owned business. A trader at the Lock Market of over 30 years selling orange juice was recently evicted with 2 weeks notice to be replaced with a replica business owned by Labtech.

Similarly an established trader of over 15 years at Buck Street market selling coffee has just been evicted to make way for a Labtech owned business selling orange juice.

There are also a significant number of empty units/stalls at Camden Lock & Stables Market as the rents are too high and not viable for small retailers. There is also a high turn over of traders at Camden Lock & Stables Markets as all traders have to sign a contract agreeing to a 2 week notice period. How can any trader invest in their business with the threat of a 2 week eviction period?

To increase the size of Buck Street Market with a large Box park development when Camden Lock and the Stables market are not even fully occupied and with the high turn over of traders does not make sense. It will not benefit the neighbourhood to have even more empty units at a larger Buck Street Market.

Point 6.16 – *It is considered that footfall would likely increase as a result of this new destination market and that it would provide further support for the local centre and shop provision.*

Labtech's own information data shows footfall is consistently down for the Camden Markets despite tourist numbers increasing in London. This indicates that the Labtech Vision and model for the Camden Markets is not attractive and the development at Buck Street with a similar vision will not increase footfall.

The planning proposal of shipping containers at Buck Street Market is not new, unique or original but duplicating what already exists elsewhere in London. It is a cheap and cynical way to add more retail square footage and take advantage of the "sui generis" use and exploit the "temporary" planning permission for market use.

Point 6.18 – *"A larger market would likely increase employment"*

This planning proposal may increase employment of Labtech employees employed in Labtech businesses but it will cause unemployment for the majority of the existing traders. Some existing traders have already been evicted for no valid reason other than for Labtech to establish an identical business. I would also argue that a larger market is not required or wanted by the local neighbourhood.

As stated earlier in my reasons for objection, the consultation with existing traders/tenants has been woefully inadequate and communication virtually non-existent and this is not acceptable.

In the Executive summary it states

"Existing Retailers which sell original merchandise are being offered the opportunity to stay at the new market or relocate to another stall in Camden. Once this tenant consultation is completed there will be a focus on attracting new start up businesses to trade from the market"

In the Planning Statement Development Proposals it states

Point 6.13 – *"To align this market more with Camden Stables and Camden Lock Markets it is proposed the majority of traders would sell authentic products which are only available in Camden. Existing tenants who meet this criteria will have the opportunity to continue trading and start up businesses will be sourced to fill the remaining stalls and containers. Labtech would seek to select a tenant mix which removes the current level of duplicity. The large containers on the high street are likely to appeal to multiples"*

So far the existing traders/tenants have had one individual interview at the beginning of August where they were asked to do a presentation of their "Brand". Following this they were asked to complete a questionnaire regarding turnover/projected sales/ targets etc and give drawings and details of their proposal for the "fit out" of the container, all within a small timescale of 48 hours.

These are market traders who sell products NOT "Brands" and the expectation and demands of Labtech on the existing traders to meet the "criteria" requirements is deliberately unreasonable and purposely makes it difficult for them. This criteria is suited to high street retailers not market traders which again supports my argument that this planning proposal is for a shopping mall and not a market.

Since the initial interviews, existing traders have not received any further information or communication from Labtech on time scales, an offer of any containers or stalls in any market, how much the rent will be, what does the rent include, does it include business rates? The existing traders have been unable to plan or run their businesses effectively due to the uncertainty.

I acknowledge there are some businesses selling counterfeit products at Buck Street Market but also among these existing traders are successful businesses of over 20 years selling original products that stand to be evicted with their livelihoods lost. The traders are reluctant to object to this planning application for fear of intimidation and reprisals by Labtech and certain eviction and the loss of their livelihood.

There is already some feedback from other traders with existing businesses at the Camden Stables and Lock Markets that they are being offered possible containers at the new site, so this will create duplicity across all the markets when Labtech have stated they wish to avoid duplicity.

I understand that Camden Council make a decision based on several factors and this planning application may seem to offer a more "tidy and visually appealing" alternative to the existing market, but I would strongly argue that to approve this planning application will make Camden Council complicit in the complete takeover of all Camden Markets by one billionaire individual whose only interest, to quote his Market management is "to sweat the asset".

Labtech are not content with rental revenue and free enterprise for the traders; they also want a percentage of the trader's turnover/profit with the mandatory requirement that you use their ipads and card payment system.

Again I emphasise that the definition of Independent business is a business that is free from outside control.

The planning proposal for Buck Street Market is for a shopping mall with businesses controlled by Labtech and NOT a "market" with independent businesses/traders. Buck Street market in its current form could be improved without the need for such extensive redevelopment. Also if more affordable rents were offered it would encourage new independent traders with innovative and original products instead of counterfeit product.

Currently Buck Street Market is still allowed to operate freely but Labtech will put an end to this with their planning proposal.

There is no interest or consideration for the traders and they are treated disparagingly without any moral decency. Labtech run the markets like a dystopian dictatorship where trader's turnover is constantly monitored and if not generating enough business are in constant fear of being evicted or face a rent increase if you are doing well. Also if you do well, there is a good chance Labtech will evict you to then replicate the business for themselves.

The original organic Camden Markets which were slightly chaotic and ramshackle with free independent traders on open stalls are the essence of what drew custom and visitors, both local and tourist to Camden.

These are now lost forever and they have been replaced by a Labtech Shopping Mall which trades under the "Brand" name of Camden Market.

What has been created is simply window dressing for Labtech's property and land portfolio without any real interest in the local residents of Camden and most certainly not the traders.

The Camden Local Plan Policy TC4 Town Centre uses,
Point (e) states the council will consider "impacts on small and independent shops and impacts on markets" when any development is proposed.

I would argue that consideration is not being given to the impact this proposed development will have on the existing market and the existing traders.

The Camden Local Plan Policy TC5 Small and Independent Shops,

Point 9.53 states the following "we will encourage developers and owners to seek independent occupiers for small units, where possible and provide premises at affordable rents to encourage small businesses. This will be achieved through the use of planning obligations.


Affordable rents are considered to be those significantly lower than the market rate and would normally be applied to accommodation for smaller, independent businesses.

There is no mention in this planning application that reduced rents will be offered, quite the contrary they are seeking to gain high rental income from multiples stores.

I understand that a pre planning meeting has already gone ahead and this planning application may likely be a done deal considering the power and influence a billionaire landowner has. However based on all of the comments I have made above I strongly urge you to refuse this planning application.

Please also note that due to fear of intimidation and reprisals by Labtech I request that all name/email and contact details be redacted from this letter prior to any publication.

Yours Sincerely

A solid black rectangular box used to redact the signature of the sender.