

**PROOF OF EVIDENCE OF TOM HOLBROOK BA(Hons), DipArch, PhD, ARB
FOR LONDON BOROUGH OF CAMDEN**

APPEAL SITE

Alpha House, 24-27 Regis Road, London, NW5 3ER ('the site')

APPELLANT

Big Yellow Self Storage Company Limited

APPEAL STATEMENT FOR ROUND TABLE SESSION

COUNCIL REFERENCE:

2023/0093/P

PLANNING INSPECTORATE REFERENCE:

APP/X5210/W/24/3337347

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INTRODUCTION

1.1

This statement addresses elements of Reason for Refusal 1 (“RfR1”) and the whole of Reason for Refusal 2 (“RfR2”), dealing with the elements of the inquiry assigned to the Round Table Session by the Inspector’s case management note and the joint statement of Counsel.

QUALIFICATIONS AND EXPERIENCE

2.1 My qualifications and experience in urban design are summarised in Appendix 2. Particularly relevant is my work on a pilot study on Regis Road, jointly commissioned by LBC and GLA, entitled *Kentish Town Pilot Area – Industrial Intensification through Co-location*.

2.2

I confirm that this statement is factually accurate so far as I am aware and contains my true professional opinions.

APPELLANT'S PROPOSALS

3.1

The Appellant proposes to demolish the existing building and construct a 17m high building, together with a vehicle parking area and landscaping. The building would be mainly used as a self-storage facility with an element of office floorspace. I have had regard to the Application plans and Mr Scanlon's Appeal Design Statement.

SIGNIFICANCE OF REGIS ROAD GROWTH AREA

4.1

On first impression, as a seemingly ordinary industrial estate, Regis Road (RR) belies its importance, so I begin my evidence by emphasising its significance as a growth area (GA).

4.2

RR is a location adjoining one of London's great High Streets, – directly opposite a Zone 2 interchange station with over ten million entries /exits per year. It lies on the edge of the Central Activity Zone, enabling good access to the West End and City and to emerging economic centres such as Kings Cross Central.

4.3

RR lies in an area experiencing rapid change, evidenced by transformational development, including large-scale speculation on both RR itself, and on adjacent sites, together with significant property transactions and consistent landowner activity, despite the pandemic and economic

slowdown. There is ongoing activity involving the Council, Yoo Capital and Joseph Homes to deliver key phases of comprehensive development of the RR site.

Council's Role

4.4

LBC as LPA have responded to the community's desire for change expressed via the *KTNP* (2016)¹ with the designation of a growth area in the CLP and via the preparation of the *KTPF* (2020), which contains the Appeal Site. The new CLP continues the direction of travel. LBC have also leveraged their own land assets to catalyse favourable change².

London Significance

4.5

London has lost around a quarter of its industrial land in the last 20 years. Demand is forecast to rise over the next 20 years and the resulting land shortage is a well-recorded problem. In response, the LP makes a shift towards retaining industrial land, requiring that industrial capacity be retained (or increased) in Camden, with all boroughs encouraged to explore potential to intensify industrial activities.

4.6

In 2020, GLA funded development of Industrial Intensification Delivery Strategies across six pilot locations in London. These strategies sought to demonstrate best practice for the masterplan-led approach (LP-E7).

4.7

As a mark of its significance as a typical London example of non-designated industrial land under pressure of change, RR was selected as a pilot.

¹ *Transformative redevelopment is expected to take place in the Regis Road Growth Area and on the Murphy site. The Council requires that redevelopment of these sites is comprehensive and delivered through a masterplan-led approach, underpinned by the principles set out in this framework. {Extract from KTPF - Adopted July 2020}.*

² This topic will be developed by Mr. Gavin Sexton in his evidence.

4.8

In 2020, 5th Studio was commissioned by GLA and LBC to undertake a study on intensification of RRGAs.³

4.9

The Study's objectives were to:

- Deliver the comprehensive employment-led redevelopment of RR, in accordance with the aspirations of the KTPF.
- Identify the required interventions needed to unlock development at RR, and the wider GA.
- Prepare an investment strategy to guide site assembly and acquisitions.
- Deliver high quality industrial space and maximise delivery of affordable housing.

4.10

The project was developed in collaboration with Avison Young (industrial agency, delivery, viability, and town planning expertise), WSP (transport) and Expedition (sustainability).

4.11

The Study addressed delivery of KTPF in practice, with typologies for delivery, taking KTPF and LP as a baseline, with particular attention to LP-E4-E7 and D4⁴.

4.12

Masterplan Approach to Industrial Intensification & Co-location

LP marks a shift from two-dimensional zoned land designation towards three-dimensional spatial masterplans. I explain the nature and significance of this shift in Appendix 3.

4.13

³ *Regis Road, Kentish Town Pilot Area – Industrial Intensification through Co-location* ("The Study"). Core Doc 8.9 The study was completed in July 2021.

⁴ The brief noted that: 'design proposals will need to demonstrate compliance with the draft LP and showcase best practice for industrial intensification in regard to layout, typology, operation and placemaking.'

This approach is fundamentally collaborative and rests on working in an integrated, cross-disciplinary way to identify and resolve conflicts and barriers to delivery.

4.14

The Study explored a range of strategies for development of RR, comparing plot-by-plot through to fully comprehensive redevelopment⁵. The strategies took account of land ownership and the likelihood, based on landowner discussions, of land coming forward in two or three parcels.

4.15

The Study demonstrated that plot-by-plot development was not capable of delivering KTPF's aspirations or ambitions for optimised co-location and intensification.

4.16

The limitations of plot-by-plot include:

- inability to improve public realm and site servicing.
- inability to introduce high-quality open space.
- failure to create LP/CLP-compliant attractive homes (a LBC priority land use).
- poor interfaces between different uses (co-location).
- inefficient industrial arrangements (intensification).

⁵ *"The Growth Area designation responds to the changing development context, from a peripheral industrial enclave to an important location at the margin of the central activity zone. Industrial intensification is required to achieve no net-loss of industrial floorspace, increase the employment density on the site and to deliver at least 1,000 much-needed homes. This requires innovative approaches to the co-location of different uses informed by a masterplan-led approach to the incorporation of some challenging requirements."*

{Extract from the Study p125}

STRATEGIES / SUMMARY

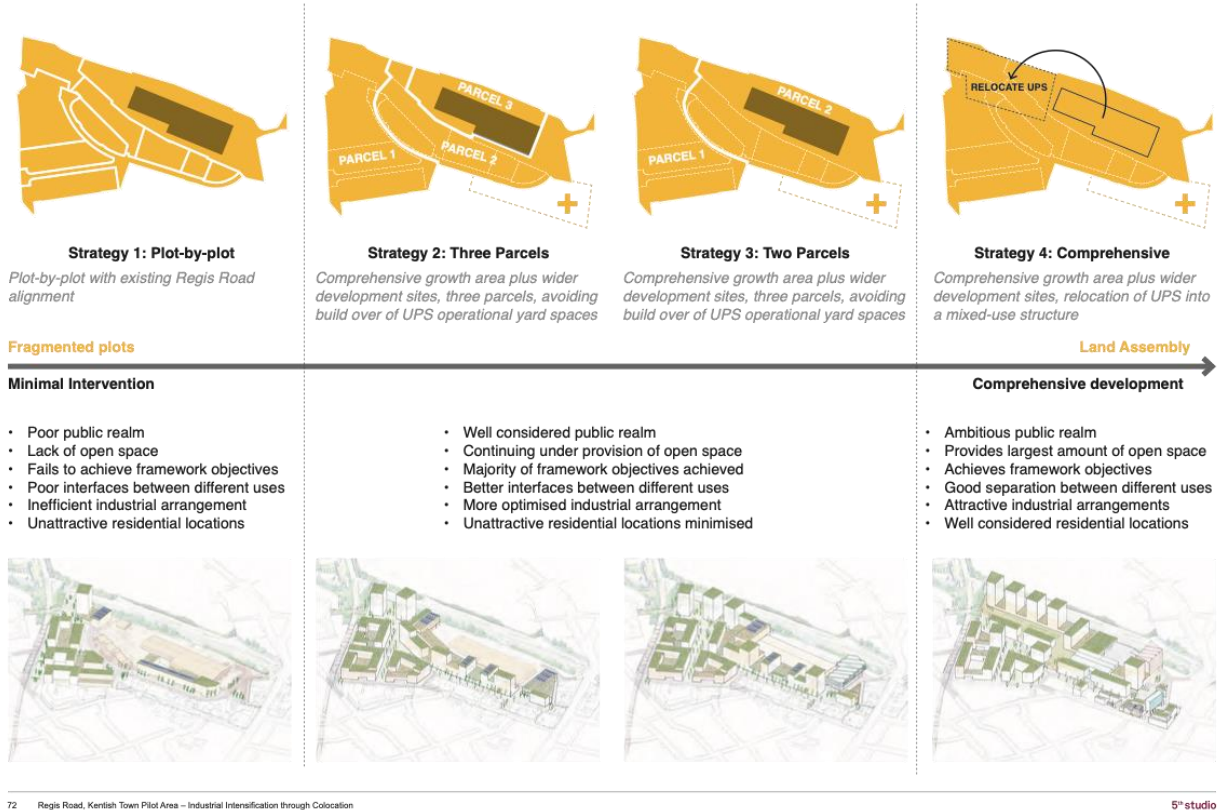


Figure 1 Extract from 5th Studio study illustrating the four strategies tested, from plot-by-plot redevelopment to a fully comprehensive masterplan. The study illustrates that KTPF objectives are deliverable only with a more comprehensive masterplan approach.

STRATEGIES / DEVELOPMENT SUMMARY



	Strategy 1: Plot-by-plot	Strategy 2: Three Parcels	Strategy 3: Two Parcels	Strategy 4: Comprehensive
Residential unit numbers	446 units	894 units	1078 units	1257 units
Retained industrial space	12,950m²	8,650m²	7,650m²	0m²
New industrial space (excluding yard space)	22,350m²	23,800m²	26,250m²	38,750m²
Workshop / Studio <100m ²	4,550m ²	3,150m ²	3,450m ²	5,050m ²
Small - 100-500m ²	1,000m ²	2,220m ²	2,080m ²	2,050m ²
Medium - 500-2000m ²	16,800m ²	11,300m ²	11,800m ²	17,850m ²
Large unit > 2000m ²	0m ²	2,780m ²	4,200m ²	8,450m ²
Car pound/recycling centre	Retained	4,350m ²	4,720m ²	5,350m ²
Total industrial space (excluding yard space)	35,300m²	32,450m²	33,900m²	38,750m²
Job numbers (excluding retained UPS, car pound and recycling centre)	c. 1090	c. 1250	c. 1455	c. 1670
Publicly accessible green space	0,4 ha	0,7 ha	0,8 ha	1,3 ha

Figure 2. Extract from 5th Studio Study summarising outcomes of each strategy. Note the range of industrial spaces, the provision of serviced yards, and the range of housing.

RFR 1.

5.1

The Appeal Site sits at the heart of the RRGAs. In such a critical location I consider that piecemeal development of the Site would prejudice comprehensive redevelopment of the GA.

5.2

While others will focus on policy issues, my concerns are the design and qualitative aspects of the Appeal proposal and the impact that it would have on wider ambitions for the GA.

5.3

The comprehensive strategies developed in our Study explored how to improve RR's connectivity. This involved introducing a new road to service industrial plots, shared between the UPS site and the plots on the north side of RR, and the establishment of a better walking and cycling connection between Kentish Town High Street and Queens Crescent.

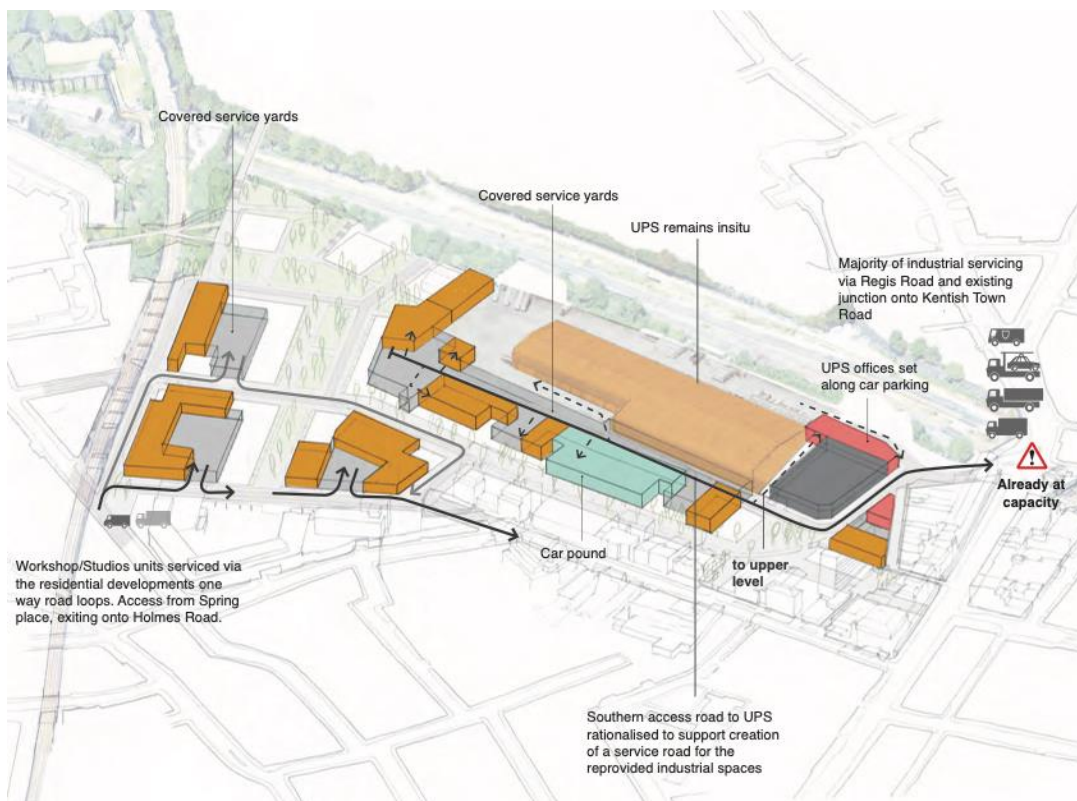


Figure 3 Extract from 5th Studio study illustrating benefits of a service road established between UPS and the northern plots along Regis Road.

5.4

The new service road would achieve two critical aims: removal of heavy goods servicing traffic from the southern length of RR⁶, and transformation of the road's character, from industrial estate road into city street. This would result in a safer walking / cycling connection linking throughout the site and beneath the railway viaduct into the rest of Camden.⁷

5.5

The Appellant's proposal extends further north than the building it replaces and beyond the current building line established by both existing building and adjacent plot. The resultant 'saw tooth' arrangement of the Appeal Scheme's northern edge would physically prevent future creation of a service route shared between the RR plots and service road of the UPS site. The Scheme would therefore directly frustrate the ability to transform the character and quality of RR.

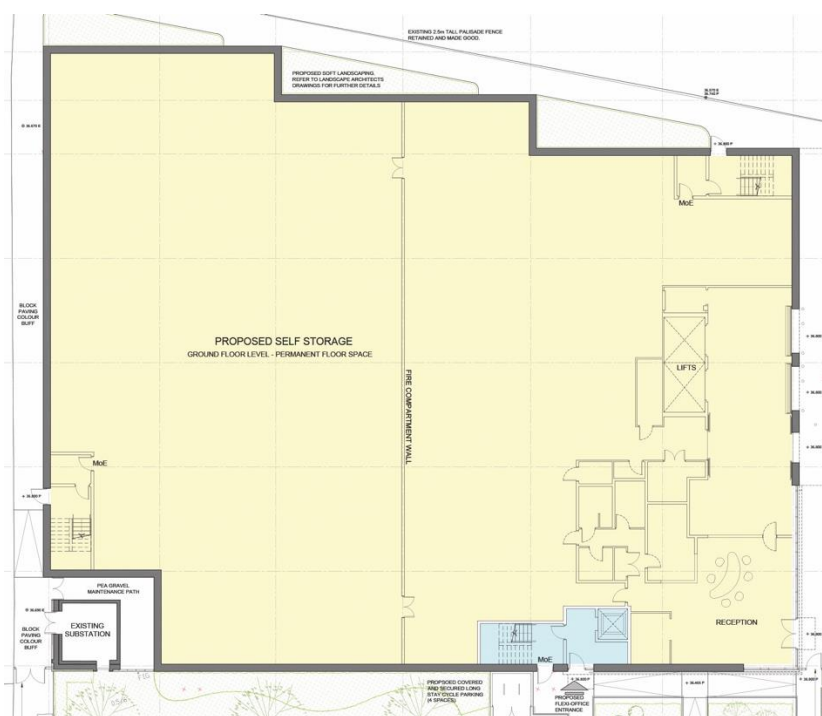


Figure 4 Appellant's proposed saw-tooth arrangement extends northwards and would prevent the establishment of a service route (Mountford Pigott 2314-P02 Proposed GF).

5.6

⁶ As acknowledged by Mr Scanlon in his Design Statement 7.62; Appellant's CD7.2.

⁷ KTPF Key Principle, Regis Road: "Regis Road should support the town centre, but not compete with it, defining its own character through a mix of employment and residential uses. Industry will remain a part of Regis Road's identity, though the introduction of office uses and regular residential entrances on the street will help to establish a more mixed-use character." Core Doc 5.12.

Rather than seeking to improve RR, the proposals perpetuate the 'estate road' character:

- the proposed storage facility is focussed on vehicle access.
- its aggressive branding is designed to navigate the visitor in an otherwise anonymous industrial estate setting.
- the building's main entrance addresses the car park / service yard, rather than the street.
- they create provides no real active frontage onto RR itself, and introduce no residential use, making a minimal contribution to the KTPF and KTPF objectives.

APPELLANT'S MASTERPLAN

6.1

The Appellant has submitted an indicative masterplan, seeking to demonstrate how the proposals could sit within the context of wider redevelopment.

6.2

In many ways, the masterplan is eloquent in illustrating how problematic the proposals are for comprehensive development.

6.3

The masterplan is plan-based, not three-dimensional⁸. It does not follow LP-D3.

6.4

The starting point for intensification of the site is no net loss of industrial space (CLP-E1; LP-E7, KTNP-SP2a). This has not been achieved in the illustrative masterplan⁹.

6.5

Should land parcels come forward plot-by-plot, then all existing industrial floorspace would have to be provided on most plots. This would not allow the desired mix of uses to emerge or ensure that uses were in the optimal places, negatively impacting the quality of housing, open space, transport, and public realm. All these limitations are evident in the indicative masterplan.

6.6

KTPF Key principle 3.1.4 aims to introduce a mixed-use character to RR. The indicative masterplan does not propose co-located mixed-use, rather, the zoning of different uses across the site. There is no gradation of uses, as has been achieved in our Study. Housing is isolated at the western end, with a problematic connection back to Kentish Town High Street.

⁸ See paragraph 4.12 above and Appendix 3 for the two- and three-dimensional approaches to masterplanning.

⁹ If the Option 2 masterplan is appraised using the floorspace applied for in the application, this would lead to a 4,475m² shortfall compared to the current industrial areas. The proposed masterplan would shift 42% of industrial space into storage, with very low anticipated employment densities. Industrial space illustrated would largely not be serviced by yard space, which is critical for most industrial operations.

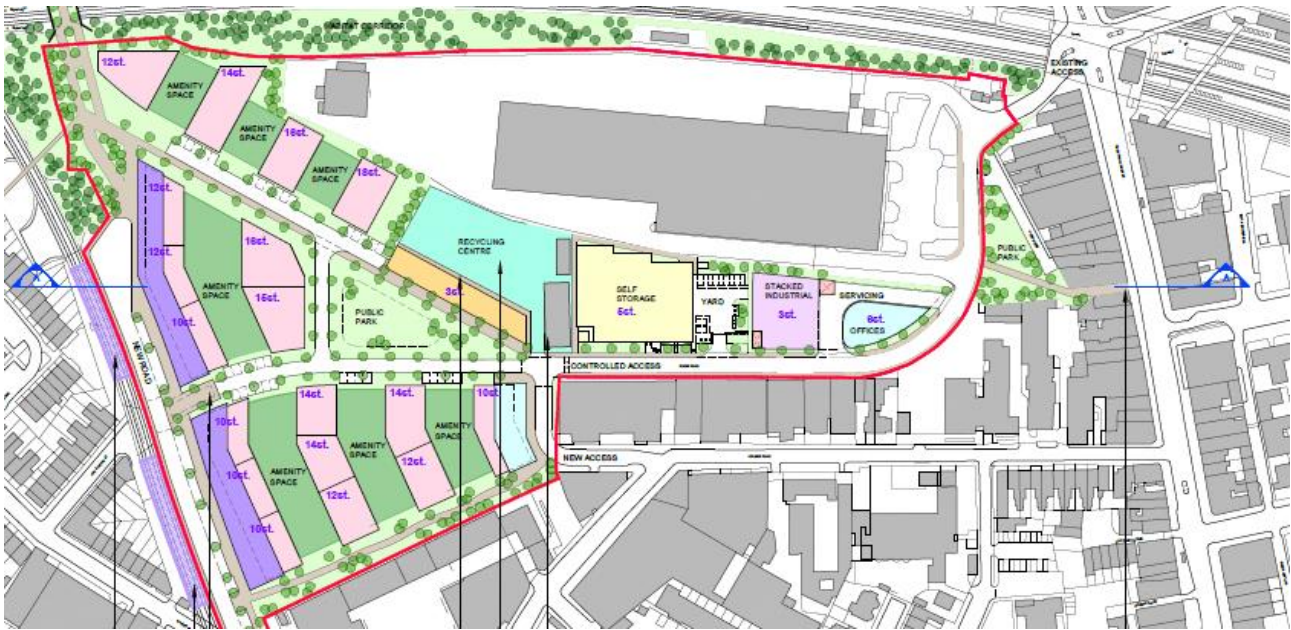


Figure 5 Appellant's masterplan is two-dimensional. Proposed housing is isolated at the western end of the site, requiring a 350m walk through an industrial estate road to access the High Street (Mountford Pigott 2314-A11-MP-DR-F010-P01 Ground Floor Masterplan Option 2).

6.7

There is little evidence of the 'innovative design approaches' expected by KTPF. The Appellant does not propose any mix of uses beyond minimal office accommodation – other examples of buildings by the Appellant include housing, which is an LBC priority land use.

6.8

The plan provides limited diversity of scale and type of industrial space, with very limited yard servicing which will limit the desired mix of industry and other employment uses.

6.9

The layout does not achieve high-quality green space – the ‘public park’ is encircled by roads and fronted by the recycling centre and therefore highly compromised. Plot-by-plot development is not capable of assembling open space into a coherent ‘green grid’ to ensure good quality, well located quality POS, greater than the sum of the parts. The proposed ‘amenity space’ between housing is poor, overshadowed by 10-15 storey buildings, with little sun-on-ground. The environment in these ‘canyon’ spaces would be poor.

6.10

Transport

Public realm plays an important role in managing potential conflicts between different uses and improving environmental quality. As indicated, the Appeal proposals would prevent removal of most service traffic such that RR would remain defined by industrial servicing, preventing creation of a more fine-grained street layout and leaving the west end of the site highly isolated.



Figure 6 Extract from 5th Studio study illustrates advantages of a three-dimensionally developed masterplan approach, with access to housing from High Street along a street, rather than an estate road, with consistent frontage.

6.11

Without a strategy for reducing service traffic from Regis Road, vehicle / cyclist / pedestrian conflicts remain, with traffic crossing pavements to yards.¹⁰

6.12

The new access into Holmes Road is problematic – LBC plan to make Holmes Road a healthy school street with restrictions on vehicles and no westbound traffic beyond Raglan Street.

6.13

Housing quality

The Appellant illustrates a ‘bar block’ building typology, ranging in height from 10–16 storeys. This departs from an average shoulder height of 6–8 storeys in our Study and is contrary to the Council’s *Building Heights Study* and KTPF.

6.14

Adoption of a single housing typology is unlikely to meet LBC’s housing mix requirements or LP Guidance Housing Design Standards¹¹, e.g. on single aspect. Lack of diversity of typologies is also likely to be problematic from a delivery perspective.

6.15

Some interfaces between industrial and residential are poor, with instances of residential overlooking 24-hour operational industrial yards. This is likely to prove problematic operationally and fail to meet the Agent of Change principle.



Figure 7 Three of four northern housing blocks overlook UPS’ 24-hour working yard. The easternmost also overlooks the recycling centre (Mountford Pigott 2314-A11-MP-DR-F010-P01 Ground Floor Masterplan Option 2).

6.16

¹⁰ The KTPF states that: “Regis Road should create a new civic route between the two important community centres, prioritising pedestrian and cycle movement.”

¹¹ LP Guidance Housing Design Standards Core Doc 8.10.

With the density of homes illustrated, ground floors of the blocks would have to accommodate bin storage, cycle parking etc, which would be unlikely to produce a satisfactory environment.

6.17

The residential development would be unlikely to create a humane and high-quality neighbourhood. It would not meet CLP and LP standards and would have challenging delivery issues.



Figure 8 Amenity spaces between 10-16 storey blocks would have problematic microclimates with little sun on ground. These are challenging spaces, unlikely to comply with London Plan standards (Mountford Pigott 2314-A11-MP-DR-F010-P01 Ground Floor Masterplan Option 2).

REASON FOR REFUSAL 2

7.1

By reason of its height, mass, footprint and detailed design, the Appeal Scheme would fail to make best use of its site or respect the design aspirations for the GA. The design is heavily branded and generic, with minimum effort to address contextual issues or contribute to expectations of wider urban regeneration and improvement.¹²

7.2

Comparison with existing

¹² Policy D3 of the KTNP sets out criteria that applications for the development of new buildings should meet: "a) Proposals must be based on a comprehensive understanding of the site and its context... b) Proposals must be well-integrated into their surroundings and reinforce and enhance local character... c) Proposals must identify and draw upon key aspects of character, or design cues from the surrounding area. Appropriate design cues include grain, building form (shape), scale, height and massing, alignment, modulation, architectural detailing, materials, public realm and boundary treatments... e) Design proposals must be of the highest quality and sustainable, using materials that complement the existing palette of materials in the surrounding buildings." *KT Neighbourhood Plan - Core Doc 5.2*

With the ambitions for positive change on this important site clearly signalled in KTNP, CLP and KTPF, proposals should improve the existing environment, yet the Appeal proposal would significantly worsen it, compared to the existing modest industrial building. Its footprint extends to the north, with a saw-tooth arrangement rendering introduction of a northern service route impossible, thereby undermining the ambition to improve the environment and perception of RR, particularly for walking and cycling.

- It worsens the building / street relationship.
- Its footprint does not perpetuate enclosure of the substation, adding to street clutter and a fragmented edge to the public realm along RR.
- It introduces an incoherent palette of materials and fussy detailed design compared to the relatively calm enclosure of the existing building. As a much larger building, in combination with the proposed height and massing, this would have a particularly negative impact.

7.3

Relationship with Public Realm¹³

The current building has eight large windows facing the street, providing some animation. The proposals worsen this relationship by creating a dead building line with no activation, fronted by a verge with poorly integrated changes of level, boundary walls and railings.

7.4

The design does not create a clear frontage or hierarchy of entrances or facades. Elements such as entrances or fire exits are dictated by internal operational logic rather than by a clear architectural approach.

¹³ Local Plan Policy D1 requires that development:

“integrates well with the surrounding streets and open spaces, improving movement through the site and wider area with direct, accessible and easily recognisable routes and contributes positively to the street frontage”. It says, “Views into buildings provide interest to passers-by and views out of buildings provide safety through passive surveillance or ‘eyes on the street’. Positive factors for frontages are entrances, shop fronts and windows. Negative factors include long blank facades, high boundary walls, solid roller shutters and service entrances and yards.”

7.5

The proposal lacks ground floor activation to the street and establishes the main entrance to the building on the flank elevation, hidden behind the existing tree, a retained wall and a change of level. As such it would not be legible from the street. It would, instead, sit behind a gate accessed via steps or a ramp.



Figure 9 Street elevation of Appellant's proposal has much less ground floor activation than existing building and presents a cluttered and confusing frontage (Mountford Pigott 2314-P09A Proposed Elevation S).

7.5

While there is an office entrance on the RR elevation, its expression as a single leaf door within a 50m elevation, into an unoccupied lobby, would be unwelcoming. This lack of visual permeability would exacerbate the hostile street frontage.

7.6

The lack of animation would have a negative impact on the streetscape and would be inappropriate for this extensive street frontage in a prominent location within the GA.

7.7

Footprint: Relationship with the Plot

The proposals prioritise visitors arriving in vehicles into the car park, rather than supporting the Council's ambition to introduce a finer grain of street-based urbanism. This is particularly unfortunate when active transport is prioritised in policy at all levels. It would perpetuate the character of RR as a busy estate road dominated by commercial vehicles, rather than a mixed street.

7.8

The building typology is derived from a retail park or industrial estate setting, as a detached building set evenly within a plot. It has not been adapted to address the street, nor does it permit

optimisation on neighbouring sites. Achieving increased development density is likely to require plot boundaries to establish 'built 'party wall conditions, with blank elevations.



06 Design

Illustrative photomontages

Illustrative photomontages

This image demonstrates how the design of the western elevation would interface with the adjoining land, in the event that it becomes visible as consequence of the consortium's redevelopment proposal.

The west elevation has been designed to achieve a good level of visual interest, articulated with the combination of glazed bays and yellow cladding as a central feature framed by brown brick. This level of subdivision achieves a good visual balance as a backdrop to the potential open space next to the site.

Although there is no design for the hypothetical residential environment, as previously highlighted, in the contemporary London residential vernacular brick has again become a very prominent material. The proposed use of brown brick on this elevation will act as a visual link to the potential residential buildings to the west.



View from Regis Road looking east in the emerging context
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Figure 10 Photomontage from Appellant's DAS illustrates how poorly proposals are integrated into the context of a changing Regis Road, as required by Local Plan Policy D1.

7.9

Loss of potential for the northern service route would frustrate the development of a comprehensive strategy for servicing industrial uses.

7.10

Elevations / External Envelope

The combined effect of the proposal in terms of height, mass, and detailed design is overbearing and poorly integrated into its setting.

7.11

The relationship between internal arrangements and external envelope is incoherent, including fenestration that does not relate to internal use. The drawings show a mismatch between plans and elevations. The plans illustrate a blank western end, with only openings around the staircase, while the elevations show extensive glazing into the storage area.

7.12

The partially-glazed elevations risk creating additional constraints on development of adjacent plots – particularly to the west.

7.13

On the south and east elevations, above the blank ground floor, there are three fenestration bands, of which only the lower two relate to the proposed office spaces, while the third-floor band opens onto open-plan storage.

7.14

Materials – Detailed Design

The existing building has a palette of two materials – including the roof covering – and a simple repeated glazing motif and calm enclosure. The materials are of relatively good quality and have weathered well.

7.15

The proposal has timber cladding, horizontal yellow metal panels, horizontal grey metal panels, vertically profiled metal cladding, microrib panels, fenestration with louvres, *brise soleil*, ventilating louvres, grey and light grey spandrel panels, a white 'feature frame', a light grey metal roof, brickwork, and a variety of doors, rainwater downpipes and gutters, curtain walling, shutters, doors, and other fenestration. This extended palette, together with all the junctions and flashings, creates a fussy, intrusive, and over-dominant presence through its detailed design¹⁴.

7.16

¹⁴ D3 of the KTNP: "Design proposals must be of the highest quality and sustainable, using materials that complement the existing palette of materials in the surrounding buildings". Core Doc 5.2.

Sections indicate that three of the five floors are demountable. They are shown 'for indicative purposes' – this appears to include the floors to the office spaces and may mean that intensification of floor area on this plot is not delivered.

8.0 CONCLUSION

8.1

I agree with the Council that the proposals prejudice comprehensive redevelopment of the area and fail to promote the optimisation of land, including the provision of a mix of land uses and supporting infrastructure.

8.2

I agree with the Council that the proposals fail to make the best use of the site or respect the design aspirations for the RRGAs.



GLOSSARY FOR PROOFS OF EVIDENCE PRODUCED BY LONDON BOROUGH OF CAMDEN

FOR PUBLIC INQUIRY COMMENCING ON
21st May 2024

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Term	Definition
ACPS	Appropriation and Compulsory Purchase Strategy: Combined strategy authorised by Cabinet Member for New Homes, Jobs and Community Investment and The Executive Director for Supporting Communities on 19th April 2024
ASoC	Appellant's Statement of Case
BARA	Bartholomew Area Residents Association
CLP	Camden Local Plan
CLSA	Conditional Land Sale Agreement
GLA	Greater London Authority
IIDS	Industrial Intensification Delivery Strategy
JH	Joseph Homes
KTNF	Kentish Town Neighbourhood Forum
KTNP	Kentish Town Neighbourhood Plan
KTPF	Kentish Town Planning Framework. Adopted 2016.
KTRA	Kentish Town Residents Action
LBC	London Borough of Camden
LP	London Plan
LBC	London Borough of Camden

NPPF	National Planning Policy Framework
PPA	Planning Performance Agreement
PTAL	Public Transport Accessibility Level
RRGA	Regis Road Growth Area
RSRR	Regeneration Strategy for Regis Road. Formally titled as “Regeneration Strategy for the Kentish Town Regis Road Growth Area” in report SC/2022/23 agreed by Cabinet on 16th November 2022
SoC	Statement of Case
SoCG	Statement of Common Ground
SPG	Supplementary Planning Guidance
YC	Yoo Capital

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APPENDICES

1. Reasons for Refusal
2. My Qualifications and Experience
3. The Masterplan Approach to Industrial Intensification & Co-location

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Appendix 1

Reasons for Refusal

1.2

Reason for Refusal 1.

The proposal, by representing piecemeal development, prejudices the comprehensive redevelopment of the area and fails to promote the most efficient use of land, including the provision of a mix of land uses and supporting infrastructure, contrary to policies G1 (Delivery and location of growth), E1 (Economic development) and H1 (Maximising housing supply) of the Camden Local Plan 2017 and policies SP2 (Kentish Town Potential Development Area) and SP2a (KTPDA – General Development Criteria) of the Kentish Town Neighbourhood Plan 2016.

1.3

Reason for Refusal 2.

The proposed development, by reason of its height, mass, footprint and detailed design, would fail to make the best use of its site or respect the design aspirations for the Regis Road Growth Area, contrary to policies G1 (Delivery and location of growth) and D1 (Design) of the London Borough of Camden Local Plan 2017 and policies D3 (Design principles) and SP2a (KTPDA – General Development Criteria) of the Kentish Town Neighbourhood Plan 2016.

Appendix 2

My Qualifications and Experience

2.1

My name is Tom Holbrook. I am Director of 5th Studio, an architecture and urban design practice. I qualified as an architect in 1995. I am an RIBA chartered architect and registered with the ARB.

2.2

I direct design work at 5th Studio on projects including complex masterplanning, urban design, space for industry and logistics, infrastructure, and sustainability. I have 27 years of experience in that role.

2.3

I am a Design Advocate for the Mayor of London, advising on Good Growth in the city. I have extensive experience of design advice, including serving on the London Review Panel and the HS2 design panel. I was a founding member of the London Legacy Development Corporation's Quality Panel for Queen Elizabeth Olympic Park. I am a member of Camden Council's independent Design Review Panel.

2.4

My academic qualifications support my understanding of urban design and masterplanning. I have a PhD from RMIT University and a Diploma in Architecture from the University of Cambridge. From 2015 to 2023 I was Professor in Architecture at RMIT University and I am currently an Adjunct Professor.

2.5

From January 2020 to July 2021, I directed work on a pilot study on Regis Road, jointly commissioned by Camden Council and the GLA, entitled *Kentish Town Pilot Area – Industrial Intensification through Co-location*.

Appendix 3

The Masterplan Approach to Industrial Intensification & Co-location

The London Plan (together with associated best practice guidance) marks a shift from two-dimensional zoned land designation towards design-led spatial masterplanning, to support a growing need for industrial intensification & co-location.

This shift acknowledges the excessive loss of industrial land in the capital with a no-net-loss position (LP-E7) while recognising that key sites are under pressure to deliver multiple outcomes, in addition to that retained capacity, including housing, public realm, and green infrastructure.

Traditional planning – with its diagram-based administrative methodologies of separation of functions through zoning – is struggling to use land efficiently in these complex settings.

Rather than separating different uses through zoning, the masterplan approach acknowledges that a three-dimensional spatial masterplan has the capability to identify and resolve conflicts between different uses. Intensification and co-location aims to improve efficient land use, while resolving conflicts between different uses through careful design.

The approach is fundamentally collaborative and rests on working in an integrated, cross-disciplinary way to identify and resolve conflicts and barriers to delivery, addressing overlooking, servicing, disturbance and noise, urban greening, sustainability, and viability.

The GLA's *Industrial Intensification & Co-location Study Design and Delivery Testing*, Section 4, offers urban scale guidance on the following headings relevant to the appellant's proposal: Deliver an efficient site layout; Provide positive street frontage; Create a hierarchy of movement and manage HGV access; Promote active transport; Separate access for different uses; Optimise yard space; Manage parking; Create better places; Avoid residential overlooking and minimise noise issues.