



PLANNING SERVICES

**TOWN & COUNTRY PLANNING (DETERMINATION BY INSPECTORS)
(INQUIRIES PROCEDURE) (ENGLAND) RULES 2000**

**PROOF OF EVIDENCE
Kristina Smith BA(Hons) MSc**

**FOR PUBLIC INQUIRY COMMENCING ON
21st May 2024**

APPEAL SITE

Alpha House, 24-27 Regis Road, London, NW5 3ER

APPELLANT

Big Yellow Self Storage Company Limited

SUBJECT OF APPEAL

Appeal against London Borough of Camden's refusal of Planning Permission for the
*'Demolition of the existing building and the construction of a self-storage facility (Use Class
B8) and office space (Use Class E(g)(i)), together with vehicle and cycle parking and
landscaping'*

COUNCIL REFERENCE:

2023/0093/P

PLANNING INSPECTORATE REFERENCE:

APP/X5210/W/24/3337347

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1.0 INTRODUCTION

- 1.1 I identify and examine the policy framework for both substantive RfRs. For RfR1, I show how the proposal is contrary to policy and guidance and would harm the Council's ("LBC's") ability to deliver its key policy objectives. For RfR2, I provide the relevant policy context at national, regional and local levels. I then address the policy-based grounds for appeal in the Appellant's Statement of Case ("SoC"), finally, addressing planning balance.
- 1.2 The full policy context, site description and planning history are included in sections 4, 1 and 3 (respectively) in the SoCG and LBC's SoC.
- 1.3 My qualifications and experience are in Appendix A. I was the principal author of the delegated report on the application. I believe the facts set out in my evidence to be true and the opinions expressed are my own.

2.0 ASSESSMENT OF PROPOSALS

RfR 1

- 2.1 I review the policy context behind the requirement for a comprehensive approach and why a piecemeal approach would harm LBC's ability to deliver its key policy objectives. I then address the policy presumption for development proposals, such as the Appeal scheme, to include (or at least explore inclusion of) housing as part of a mix of uses and demonstrate why exclusion of housing is contrary to policy.
- 2.2 Regis Road ("RR") is designated as a Growth Area ("GA") in the Council's strategic planning Policy G1. As such, RR (together with five other GAs and select other locations) will accommodate a concentration of development that will help deliver LBC's priorities, namely 16,800 homes (self-contained housing being the Council's priority land use) and 695,000 sqm of office floorspace over the Plan period. To accommodate a significant uplift in residential and commercial floorspace, LBC expects development to be done differently in GAs compared to non-designated areas, as explained in Policy G1, *'the Council will require development in the growth areas... to be consistent with the area priorities and principles set out below [in the supporting text]'*.
- 2.3 Supporting paragraph 2.32 cites area priorities as: higher density industrial provision, a substantial increase in homes and jobs and improved movement around and through the area.

It continues, *'Redevelopment will only be considered where this is employment-led and part of a comprehensive scheme.'*

2.4 Principles for delivering the scale of growth envisioned by Policy G1 are summarised as:

- high density to make the most efficient use of Camden's land;
- mixed-use including an expectation that development proposals in GAs will contribute towards meeting Camden's housing need;
- multi-site in recognition of the greater benefits that can be delivered through proposals across a number of sites in terms of affordable homes, open space, community facilities and employment benefits¹.

2.5 The Appeal scheme fails to meet these principles. It is low-density, comprising only two permanent floors (it is likely but cannot be assumed that the indicative floors will materialise) within a bulky building on a relatively large plot with significant open car parking. The scheme is largely a B8 use with a small element (approx. 289 sqm) of short-lease office floorspace. It provides no residential and the supporting materials fail to meaningfully explore and discount the potential for housing. Finally, the proposal fails to realise the benefits that a multi-site approach could offer. The Appeal Scheme would frustrate a multi-site approach across the rest of the GA. By their own admission², the Appellant turned down a proposition from Yoo Capital to locate them elsewhere in the GA on a site where they could achieve more floorspace and be fast tracked as part of a first phase.

2.6 The draft new CLP explicitly refers to the requirement for a comprehensive approach in Policies DS1, IE2, C1 (through reference to KTPF) and Site Allocation C2. The Site Allocation, which has been through three rounds of public consultation, states: *'Proposals should be progressed through a comprehensive masterplan process, informed by the Kentish Town Planning Framework'*. The new plan is a clear expression of LBC's direction of travel, informed by wider policy changes and events on the ground since adoption of CLP. It is at Regulation 18 stage³ with adoption expected mid-2026. The draft new CLP has considered the most recent changes to the NPPF, as explained in Appendix C.

2.7 KTNP was adopted in 2016, marginally pre-dating CLP. It was the first component of the development plan to propose a comprehensive approach. It reflects how the community

¹ CD 4.2- Paragraphs 2.7 – 2.15

² CD 11.2 - Appellant's SoC paragraph 4.16

³ Public consultation ended on 13th March 2024

recognise the benefits of comprehensive development. KTNP states⁴, '*new development will enhance the existing neighbourhood and will bring long term benefits from increased industrial floorspace and the provision of new residential development.... the local community has said that the Industry Area does not feel like part of Kentish Town and it wants to see a comprehensive and co-ordinated approach taken to the potential redevelopment of KTPDA*'.

2.8 KTNP Policy SP2a contains 'General Development Criteria' for development at RR. These criteria are wide ranging and include expectations about land use, affordable housing, provision of routes and connections, views, social infrastructure, public spaces, parking and environmental improvements. KTNP treats the site as an area that will be subject to comprehensive development as these criteria do not easily relate to a piecemeal development scenario. For instance, public open space (vii), community leisure facilities (viii) and environmental improvements (ix) are not typically items that could effectively be delivered outside a comprehensive development context.

2.9 To support comprehensive development of RRGAs, KTPF was adopted in July 2020 after three rounds of public consultation. It sets out a vision and strategy to guide future development within the Kentish Town area, based on the principles and priorities for the area set out in the development plan at the time of its adoption. It articulates why comprehensive development is crucial for delivering the GA development objectives and warns that piecemeal planning applications will not be acceptable and will be resisted. For reasons covered by Dr Holbrook and Mr Sexton, piecemeal development harms LBC's ability to achieve key objectives of KTPF.

2.10 Further limitations of a piecemeal approach to development are found in the LP requirement (Policy E3) to take a no-net-loss approach to industrial floorspace. If land parcels were to come forward outside a comprehensive development context, then all existing industrial floorspace would need to be re-provided at the plot level resulting in industrial floorspace spread across the RRGAs. As Dr Holbrook demonstrates, this would have harmful consequences for the redevelopment of the area in terms of housing, transport strategy and public open space provision. A comprehensive approach, however, could achieve industrial intensification alongside the other objectives of the KTPF, including delivery of a significant amount of high-quality housing.

⁴ CD 5.13 - Pg.43, Kentish Town Planning Framework (2020)

Housing

- 2.11 As set out in its SoC⁵, Camden has not met its housing target for several years. Increasing housing delivery is a top Government priority and NPPF was revised in December 2023 to further promote it. Recent Government announcements⁶ emphasise the importance of housing delivery and have introduced potential measures for underperforming councils including a 'brownfield presumption' for large urban areas. Writing to the Mayor of London earlier this year⁷, the Secretary of State sets out policy changes aiming to unlock housing delivery in the capital, particularly on brownfield sites.
- 2.12 LP Policy H1 states that, to meet housing targets, boroughs should optimise potential for housing delivery on all suitable and available brownfield sites through their development plans and planning decisions. Suggested potential sources are: sites with PTAL ratings between 3-6 / located within 800m of a station / town centre; and industrial sites (subject to other policies). The Appeal site meets both criteria. LP Policy E7 LP does not preclude incorporation of housing on the site; it meets part C because it has been allocated in an adopted Local Plan and there is scope for industrial, storage or distribution floorspace to be provided as part of mixed-use intensification. There is no reason why the criteria of Policy H1 (d) could not be met; they would be most effectively met via a comprehensive approach. RR was chosen as one of GLA's six pilot locations for development of Industrial Intensification Delivery Strategies. The Strategies were intended to build planning confidence of partners to deliver housing alongside industrial intensification and in accordance with Policy E7⁸.
- 2.13 CLP Policy G1(c) expects provision of a mix of uses where appropriate including an element of self-contained housing where possible. The site is highly accessible by public transport and close to a town centre. The proposed use is relatively benign and could be co-located with housing, as the Appellant has demonstrated on other BY sites⁹. I therefore consider inclusion of housing within proposals to redevelop the Appeal Site to be both

⁵ CD 8.1 - Paragraph 6.10

⁶ CD 8.22 and CD 8.23 - Michael Gove 'The Next Stage in Our Long-Term Plan for Housing Update' (statement dated 19/12/2023); Michael Gove 'Build on brownfield now, Gove tells underperforming councils' (press release dated 13/02/2024)

⁷ CD 8.24 - Letter from Rt Hon Michael Gove to Rt Hon Sadiq Khan 'London Plan Review' (dated 12/02/24)

⁸ CD 8.25 - Paragraph 2.1 [DD2532 London Business Rates Pool -Industrial Intensification Delivery | London City Hall](#)

⁹ CD 9.1 and CD 9.2 - For example, a completed scheme at Kingston-upon-Thames, RB Kingston-upon-Thames (LPA reference: 05/12156/FUL) and a recent permission in Wapping, LB Tower Hamlets (LPA reference: PA/21/02513/A1)

appropriate and possible in principle. The Appeal proposal not only excludes housing but fails to explore the potential to incorporate it.

2.14 CLP Policy H1 regards self-contained housing as the priority land use of the CLP and, where sites are underused or vacant, expects provision of the maximum reasonable amount of housing compatible with other uses required on site (part d). The Appeal Site is currently underused and vacant and none of the exemptions in paragraph 3.30 apply, so the assumption is that redevelopment should include a housing element. Policy H2 supports the aims of Policy H1 and states, 'in all parts of the borough, the Council will encourage the inclusion of self-contained homes in non-residential development.'

2.15 Site Allocation C2 (Regis Road, Holmes Rd Depot) in the draft new CLP includes as allocated uses 'permanent self-contained homes with an indicative capacity of 1,000 additional homes'. Part a of 'development and design principles' reads 'intensify industrial [uses]....through co-location with housing...'

2.16 KTPF expects housing as a priority use and encourages innovative typologies that co-locate industry and residential to boost housing numbers whilst retaining industrial floorspace. The 5th Studio Study explored co-location and demonstrated that, with a comprehensive approach, industry can be planned allowing for placement of lighter, innocuous industrial uses next to residential. By carefully managing interfaces between different uses, housing provision can be increased and improved.

RfR2

2.17 NPPF was updated in 2023 to place greater emphasis on beauty and place-making. It states: '*the creation of high quality, beautiful and sustainable buildings and places is fundamental to what the planning and development process should achieve.*'¹⁰.

2.18 At regional, local and neighbourhood levels, Policies D3 and D5 (LP); Policy D1 (CLP); and Policy D3 (KTNP) are relevant. Dr Holbrook demonstrates why the proposal is not in conformity.

¹⁰ Paragraph 96, NPPF

3.0 APPELLANT'S POLICY-BASED GROUNDS OF APPEAL

- 3.1 This section will address the policy-based grounds in the Appellant's SoC (to which all paragraph references relate), summarising each point before providing a response.
- 3.2 Paragraph 4.4 argues that the policies included in RfR1 do not require comprehensive development of the entire GA or prohibit piecemeal development.
- 3.3 Taken together, there is a clearly communicated policy objective to the effect that a comprehensive approach is expected to deliver the development outcomes envisaged by the GA designation. Where the requirement is not explicit, it is implicit. The growth expectations, together with the required infrastructure, can only be achieved with a comprehensive approach, as Dr Holbrook and Mr Sexton demonstrate. The draft new CLP, including the Site Allocation, expressly continues the direction of travel by requiring comprehensive development and stating the unacceptability of a piecemeal approach.
- 3.4 Paragraph 4.6 stresses that explanatory text to CLP Policy G1 is not policy and cannot create additional policy requirements. I accept this as a generality, but here there is an express link within the Policy to supporting text, requiring compliance with 'the area priorities and principles set out below'. Supporting text is material and, in this instance, carries particular weight in relation to application of Policy G1; specifically, paragraphs 2.5, 2.6, 2.14, 2.15, 2.18, 2.22 and 2.32 – 6 clearly enunciate the comprehensive approach and signpost further Council guidance.
- 3.5 Paragraph 4.7 refers to the mention in supporting text to Policy G1 of working with stakeholders to 'further investigate the opportunity of comprehensive development'. CLP was drafted over 7 years ago and this was a snapshot in time. LBC are now at a more advanced stage with the regeneration strategy for the area, as Mr. Sexton demonstrates.
- 3.6 Paragraph 4.8 argues that CLP, including Policy G1, is out-of-date because it has not been reviewed within 5 years and has been overtaken by events on the ground. Whilst local plans must be reviewed every 5 years, NPPF does not state that adopted policies must be disregarded. Paragraphs 224-5¹¹ deal with the weight of pre-NPPF development plan policies. I consider Policy G1 to be consistent with NPPF policies, in particular:

¹¹ Paragraph 224, NPPF - The policies in this Framework are material considerations which should be taken into account in dealing with applications from the day of its publication. Plans may also need to be revised to reflect policy changes which this Framework has made.

Paragraph 225, NPPF - However, existing policies should not be considered out-of-date simply because they were adopted or made prior to the publication of this Framework. Due weight should be

- para 128. - “Planning policies and decisions should support development that makes efficient use of land...”
- paragraph 129. - “... a) plans should contain policies to optimise the use of land in their area and meet as much of the identified need for housing as possible...
- c) “local planning authorities should refuse applications which they consider fail to make efficient use of land”
- paragraph 110. - “Planning policies should: a) support an appropriate mix of uses across an area, and within larger scale sites...”

3.7 The growth locations in the second part of the policy are still current together with the principles in supporting text. Camden’s current target is set out in LP¹².

3.8 Paragraph 4.41 states that RR is the only GA not identified in LP as an ‘opportunity area’ or ‘area for intensification’ and is therefore not subject to LP delivery targets. Though RR is not designated in LP, it is subject to the delivery targets of KTPF and Site Allocations (draft new CLP).

3.9 Paragraph 4.44 points to Policy G1(d), providing that a mix of uses can be provided ‘*either on site or across multiple sites*’ which the Appellant interprets to mean that a mix of uses is not expected on each plot. That is consistent with my interpretation, but the key issue is how a mix of uses is to be secured if each land parcel is brought forward according to what each landowner wants. without regard to policy expectations. If a piecemeal approach is to achieve the objectives of the development plan and KTPF, it must contribute comprehensively including towards housing (and affordable housing), industrial floorspace, open space and infrastructure. There are significant difficulties with achieving this effectively on each plot and the Appeal Scheme does not do this.

3.10 Paragraph 4.58 states that Policy E1 does not require single comprehensive development and the proposed land uses comply with E1.

3.11 I agree with the Appellant, though I would add that the aims of Policy E1, insofar as harnessing the benefits of economic growth are concerned, could be more readily achieved through a comprehensive approach.

given to them, according to their degree of consistency with this Framework (the closer the policies in the plan to the policies in the Framework, the greater the weight that may be given).

¹² CD 4.1 - Table 4.1, pg. 163 - 10,380 additional homes from 2019/2020 to 2028/29

3.12 Paragraphs 4.61 – 4.62 refer to Policy H1’s housing delivery targets before claiming that the Appellant’s indicative masterplan shows how RR would make a significant contribution towards meeting the policy target. The Appellant’s indicative masterplan, to achieve its proposed housing numbers, relies on the whole GA coming forward for comprehensive development, transcending plot boundaries, except the Appeal Site. There is therefore implicit acceptance that comprehensive development is necessary to achieve the policy objectives but the Appellant offers no evidence to show how it would deliver its theoretical masterplan, notwithstanding its assumptions about what those other sites will have to produce if the Appeal is allowed.

3.13 Paragraphs 4.64 and 4.66 state that Policies SP2 and SP2a of the KTNP do not contain a comprehensive development requirement. The requirement is implicit as many of the objectives of the Plan (e.g. new footpaths and cycleways, community leisure facilities, public squares) could not be brought forward without a comprehensive approach.

RfR2

3.14 Dr Holbrook responds to the Appellant’s design case.

3.15 Paragraph 4.74 assumes there is no conflict with LP Policy D3 or the NPPF as they were not referenced in the RfR. LBC does not accept this, as Dr Holbrook shows.

4.0 PLANNING BALANCE

4.1 The Appeal Scheme would harm LBC’s ability to engage collaboratively with landowners and assemble land so as to optimise redevelopment of the GA. It would impede delivery of much needed housing, public open space and a servicing road. It would also harm the existing streetscape and character of the area and fail to achieve the design objectives of policies and guidance, as a result of its poor architectural quality.

4.2 Public benefits include direct employment creation of 3-4 jobs, a small amount of affordable workspace and an employment skills and training plan¹³, including requirements for construction-phase employment and apprenticeships. In reflection of their minor scale, I attach limited weight.

¹³ Both secured by S.106 obligation

4.3 A less quantifiable benefit is the proposal's employment support function. The Appellant claims the scheme would create or retain between 145-205 jobs (excluding mezzanine levels). However, the Economic Statement¹⁴ does not demonstrate how jobs were created specifically by BY or that a BY facility is essential to their continuance. It relies on the accuracy of survey information provided by BY's customers; data for questions 6-8, which are particularly pertinent to BY's case, are not provided. The response rate is low at 8%, averages are deduced and an employment density metric generated. Only 40% of space in BY's London locations is used by businesses, so this percentage should be applied to employment generation, resulting in 58-82 jobs. Indirect employment benefits are beyond the Appellant's control and vulnerable to external influences (self-storage market, local economy etc); moreover, planning permission would not be personal to BY. I therefore afford indirect employment benefits very limited weight.

4.4 Other public benefits identified in the Appellant's SoC¹⁵ include provision of a sustainable building, biodiversity enhancement and reduction in vehicle trips. For reasons in Section 8 of the Council's SoC, I attach negligible weight to them.

4.5 The scheme represents considerable permanent harm to LBC's strategic aims for delivering transformative development of a key GA, as well as to the character and appearance of the area to which I attach significant weight.

4.6 The harm is therefore not outweighed by public benefits.

¹⁴ CD 1.16 - Paragraph 3.14, Appellant's Economic Statement prepared by Quod

¹⁵ CD 11.1 – Paragraph 5.3

APPENDIX A - My Experience and Qualifications

- 1.1 I, Kristina Smith, have prepared this proof of evidence for presentation at the Public Inquiry into the appeal. I am a Deputy Team Leader in the Development Management service at the London Borough of Camden where I have worked for close to nine years.
- 1.2 During my career as a planning officer, I have gained extensive experience of working on a wide variety of major development proposals including many in the Kentish Town area which has resulted in a valuable familiarity with the locale.
- 1.3 My academic qualifications include a 2:1 Bachelor of Arts degree in Geography from Durham University followed by a Master of Science post-graduate degree (Distinction) in Urban Regeneration with Spatial Planning from the Bartlett School of Architecture at University College London.
- 1.4 The evidence that I have provided for this appeal is accurate to the best of my ability and I confirm that all the factual material is true to the best of knowledge and that any professional opinions expressed are my own.

APPENDIX B – Consultation Responses

Overview

1.1 The Council issued 346 notification letters to local residents and landowners in addition to notifying local groups and Ward Councillors. The Council has received 16 responses from residents and landowners. Of these, 15 are objections to the Appeal Scheme and one is a letter of support. In addition, objections have been received from the following local groups: Kentish Town Neighbourhood Forum, Bartholomew Area Residents Association, Inkerman Residents Association and Kentish Town Road Action.

Objections

1.2 A summary of the objections from local residents includes the following:

- Undermines benefits of comprehensive redevelopment including new housing, businesses, environmental improvements and business environments;
- Application fails to meet the goals of Council policy and guidance;
- If allowed, would give other landowners incentive to carry out piecemeal development;
- Would result in unacceptable levels of traffic in an already congested area with high levels of air pollution;
- Kentish Town and the surrounding area already includes several storage warehouses, don't need another;
- Storage facility would bring a small number of low pay, low skills jobs to the area.

1.3 A key stakeholder in the area, the Kentish Town Neighbourhood Forum, has written in objection to the Appeal Scheme. Their representation can be summarised as follows.

- Poor consultation efforts by the Appellant. KTNF, or other local groups, received no consultation from Big Yellow contrary to assertions made in submission and in stark contrast to the engagement efforts of another landowner who has actively sought to hear the views of KTNF.
- The site was acquired a year after the adoption of the KTNP and so would have been known to BY during its acquisition.
- BY's planning activity is particularly unacceptable as it is taking place at a time when there is increased likelihood a masterplan will go ahead in next 6-12 months.
- Development of the Regis Road estate has been a pressing wish in the KT community for at least 15 years and is at the core of the KTNF and KTNP.

- The need for a “comprehensive and co-ordinated approach” is referenced throughout the KTNP. Likewise, a piecemeal plan is opposed, which would be the outcome of allowing the appeal.
- KTNP policies emerged from intensive engagement with the local community to understand the sort of development people living and working in the area wanted and needed.
- KTNP is quite specific about its vision of a mixed-use space and envisions some residential buildings incorporating active commercial uses at ground level.
- KTNP believes that refusal of planning permission is justified under a) and b) of paragraph 49 of the NPPF (relating to prematurity) because the effect of the larger depot-style building in the centre of the new development area would undermine the plan-making process, location or phasing of any new more comprehensive development.
- The proposed building, due to its massing with minimal articulation, becomes strikingly influential within the context of a mixed-use strategic development, where residential, business and (creative) industry must co-exist.
- With reference to the Appellant’s Statement of Case, KTNP does not agree that 6.5 years is a reasonable period to dismiss the ideal of comprehensive redevelopment given the pandemic and subsequent stabilising of the economy.
- There remains potential for negotiation and use of compulsory purchase powers.
- KTNP fears that a successful appeal would influence other landowners to push for further piecemeal applications which would further limit possibility for a co-ordinated development.
- Piecemeal development would affect shared maintenance payments for public infrastructure and green infrastructure, and result in less.
- Piecemeal approach is inherently problematic for creating welcoming, safe and interactive biodiverse networks rather than isolated spaces of greenery and biodiversity i.e. creating nature recovery networks that link up with existing biodiverse spaces.
- Employment figures are highly inflated. The Quod survey is not independent, is mis-calculated (40% not applied to floorspace and based on floorspace to be built out using PD rights) and is by BY’s own admission, an estimate as difficult to say what percentage would exist without BY’s storage facility.
- Photos of workspaces included in Customer Case Studies (Appendix A) shows no windows, providing substandard of design contrary to criterion ix of SP2a (KTNP, p.44)

- The proposed building has been designed in isolation from its surroundings. A lack of contextual approach is revealed through its massing, architectural typology and materials, the use of green space and its relationship with the street.
- Massing is blocky with limited articulation, suited to an out of town industrial site but lacks any sensitive response to the street, site permeability or the urban grain of a mixed-use inner suburb development.
- Building is cut off from the street due to blank frontages, provides no visual interest or sense of safety.
- The green strip to the front along the pavement abuts the blank wall of the east elevation providing limited value to users or residents and workers of KT. It softens but is unusable.
- The approach sets a dangerous precedent – each new development assumes that others in the site will take up the less profitable requirements, as shown in the Illustrative Photomontage which shows the adjacent plot without any building and providing the open space requirements.
- North elevation is entirely opaque which assumes no requirement for a meaningful facade as the IPS depot will remain in its current position and form. Any alternative scenario would be faced with this elevation.
- The appeal site's location at the centre of the development site alongside the main access into the area means this plot is influential to the character of the development area. The appeal scheme would further segregate the area into an industrial north zone and finer grained residential south.
- The proposals do not enhance local character and increase barriers experienced by users (built, visual, environmental)
- Design and a comprehensive approach are co-dependent – high-quality design will only be possible as part of a comprehensive plan.

1.4 Kentish Town Road Action (KTRA) have objected on the following grounds:

- KTRA was not consulted about this application.
- It is vital that before any development happens, a comprehensive masterplan is designed for the whole area with input from all stakeholders, as specified in the adopted Neighbourhood Plan. This is far too important a site for piecemeal development which could ruin the change of a well-designed new neighbourhood.
- Proposed development will add to the density of traffic on the already overburdened Kentish Town Road. Clear that the Appellant is planning an

increase in parking spaces contrary to policy SP1a of the KTNP which requires car-free.

1.5 Bartholomew Area Residents Association (BARA) have objected on the following grounds:

- Principal ground for objection is the attempt by a single owner to redevelop their land alone will jeopardise comprehensive redevelopment of the entire site. Comprehensive development is the stated objective of the KTNP, the KTFP with which we have been engaged with over the last 12 years.

1.6 The Inkerman Residents Association objected on the following grounds:

- We have worked with other stakeholders towards a comprehensive plan for the development of the industrial sites. These are large and important areas where good development could enhance the whole area in terms of employment, housing and the environment. This planning application undermines that goal by proposal a bulky, out of keeping building in a crucial position.
- We have not before had an opportunity to comment contrary to developer's claims.
- The application fails to meet the goals of the Kentish Town Neighbourhood Plan, the Camden Local Plan and the Kentish Town Planning framework.
- The developer dismisses the existing building as out of date, but does not address the possibility of retrofitting it, as required in the Local Plan.
- The scale and bulk of the planned development is wrong for the site and does not have a positive relationship with the surrounding built and natural environment, as developer claims.
- The development contravenes national, local and London wide policies which emphasise the need for a housing / commercial mix.
- The employment claim is dubious.

1.7 Yoo Capital have made a representation on the Appeal that seeks to provide an accurate base of understanding in response to various references to Yoo Capital and the status of the masterplan for the RRGGA made by the Appellant in their Statement of Case. The representation also provides information and updates on progress, consultation events and a programme of activity. Together with Mr Sexton's evidence, this demonstrates a commitment to delivering comprehensive redevelopment through a masterplan-led approach.

1.8 There is considerable objection to the Appeal Scheme locally both from residents and local groups. Nearly every objection refers to how the proposal represents piecemeal development and risks prejudicing the recognised benefits of comprehensive development. The objections reveal the strength of feeling in the local community for a transformative approach to the redevelopment of the RRGAs as crystallised in the KTNP, the result of *'intensive engagement with the local community to understand the sort of development people living and working in the area wanted and needed'*.

1.9 There is palpable enthusiasm in the consultation responses around the plans for a Film Quarter and new housing in contrast to the appetite for another storage facility which several local residents claim there are already several of in the local area.

1.10 A concern relating to traffic generation is the only recurrent objection that I would refute as the impact is commensurate with a use of this nature and the planning submission demonstrated a slight reduction in trips compared to the existing lawful use, a conclusion that my colleague in the Council's Transport team agreed with.

Support

1.11 One letter of support was received from a local resident, summarised as follows:

- The Council's complaint about piecemeal is trivial. All development is piecemeal e.g. King's Cross used repeatedly to exemplify good modern planning, was built out site-by-site.
- The whole site cannot be redeveloped at once and so piecemeal development is inevitable.
- The developer hasn't produced a masterplan yet or given precise timing for the delivery of one.
- Concerns that Camden's role as LPA and regeneration partner of YC are not properly separated. The LPA should recognise there are several ways to achieve improved masterplanning of the RR area.
- Block to piecemeal development is an artificial restraint on free market activity and the ability of the private sector to develop business to meet public demand.

1.12 I respond as follows:

- Piecemeal development is not defined by development that is built out site-by-site, rather development that is unsystematic and carried out as and when sites come forward. Comprehensive re-development can be constructed over a

series of phases, but crucially it is planned and managed. King's Cross is in fact an example of comprehensive development whereby an outline planning permission was obtained for the entire area with individual plots coming forward as Reserved Matters.

- A PPA¹⁶ has been agreed with the LPA that includes key milestones for the preparation and adoption of a masterplan.
- Comprehensive and transformative redevelopment of the RRGAs is a strategic priority for the Council and enshrined in independently examined planning policy, as well as Council guidance.

¹⁶ CD 8.21

APPENDIX C – Policy Statement

Draft New Local Plan update

19/04/2024

The draft new Local Plan has considered the most recent changes to the National Planning Policy Framework (NPPF). The most recent version of the NPPF was released on 19 December 2023, the day before the draft Plan was approved by Cabinet (i.e. 20 December 2023). Cabinet also approved delegation of minor changes to the plan to the Director of Economy, Regeneration and Investment, in consultation with the Cabinet Member for New Homes, Jobs and Community Investment. Subsequently, minor changes to the Plan were signed off through a Non-Key Executive Decision on 26 January 2024. This provided the Council with an opportunity to make minor changes to the plan in response to the December 2023 version of the NPPF if necessary, although it was considered that none were needed as the draft Plan was consistent with that version of the Framework. The changes made to the NPPF in December 2023 were relatively limited and broadly as expected following previous government consultation.

The indicative timetable for future stages of the preparation of the Local Plan, as set out in the [Local Development Scheme](#), is:

- | | |
|--|----------------------|
| • Consultation on pre-Submission draft | Winter 2024/25 |
| • Submission for Public Examination | Spring 2025 |
| • Independent examination hearing sessions | Autumn - Winter 2025 |
| • Adoption | Summer 2026 |

Proposed masterplan update

The following steps will be required as part of the adoption of the master plan.

- Stage 1 – Preparation of addendum document and consultation material (approx. 6 weeks)
 - Receipt of agreed masterplan from Yoo Capital
 - Cabinet Member briefing
 - Preparation of addendum document in Camden corporate style
 - Production of consultation material
 - Publicity
 - Consultation events
 - Commonplace website set up
- Stage 2 - Consultation (6 weeks)
- Stage 3 – Adoption (approx. 6 weeks)
 - Consultation results analysed
 - Consultation report produced and published

- Single Member Decision to adopt as addendum to KTPF

When adopted the masterplan will be a material consideration when assessing planning application and in decision-making.

Ends.



GLOSSARY FOR PROOFS OF EVIDENCE PRODUCED BY LONDON BOROUGH OF CAMDEN

FOR PUBLIC INQUIRY COMMENCING ON
21st May 2024

APPEAL SITE

Alpha House, 24-27 Regis Road, London, NW5 3ER

COUNCIL REFERENCE: 2023/0093/P

PLANNING INSPECTORATE REFERENCE: APP/X5210/W/24/3337347

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. Adopted 2016.
KTPF	Kentish Town Planning Framework. Adopted 2020.
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