

## Summary of Kristina Smith's Proof of Evidence

My proof of evidence sets out the relevant planning policy and guidance context at a national, regional and local level relevant to Reason for Refusal 1 and interprets it in relation to the proposal. For Reason for Refusal 2, it sets out the relevant policy context and references Dr Holbrook's evidence for the Council's design case. My evidence then covers the planning balance of the proposal and demonstrates that the considerable harm to the Council's strategic objectives, as well as the character and appearance of the area, would not be outweighed by the limited public benefits. It also addresses the consultation responses to the Appeal Scheme which comprise 19 objections (15 residents/ landowners and 4 local groups) and one support.

Policy G1 of the Camden Local Plan (CLP) relates to the delivery and location of growth and is central to my case. It designates Regis Road (RR) as a Growth Area (GA) and makes clear the expectation that Growth Areas will accommodate 'the most significant growth'. To achieve this, the policy makes direct reference to principles and area-based guidance that will enable GAs to contribute towards achieving the strategic objectives of the CLP. In this instance, the policy cannot be applied without reference to the supporting text, providing it particular weight in decision-making. The principles include high density development to make the most efficient use of land; mixed-use developments that contribute towards a recognised housing need; and multi-site proposals that harness the benefits of development proposals across a number of sites rather than individual schemes. Area-based guidance for RR expressly states, '*Redevelopment will only be considered where this is employment-led and part of a comprehensive scheme.*' Its priorities for the RRGAs are higher density industrial provision, a substantial increase in homes and jobs and improved movement around and through the area. Assessed against these principles and guidance, the Appeal Scheme is not in conformity. It is low-density, provides no residential and not only relates to a single site but would frustrate a multi-site masterplanned approach that is actively being worked up for the rest of the GA. Policy G1 should be afforded due weight as it remains consistent with NPPF policies, and the locations of growth remain relevant. The draft new CLP is a clear expression of LBC's direction of travel and explicitly refers to the requirement for a comprehensive approach in several policies and Site Allocation C2. The Site Allocation, which has been through three rounds of public consultation, explicitly states: '*Proposals should be progressed through a comprehensive masterplan process, informed by the Kentish Town Planning Framework.*'

The ambition of comprehensive development for RR is shared by the local community including the Neighbourhood Forum who secured the principle in the Kentish Town

Neighbourhood Plan. They recognise comprehensive and coordinated development as crucial to enhancing the existing neighbourhood and the realisation of long-term benefits for those who live and work in Kentish Town. Several of the objectives of policy SP2a, for instance new sustainable travel routes and public squares, are reliant on a comprehensive approach to development.

A clear vision and development strategy for the area is provided by the Kentish Town Planning Framework (KTPF), adopted in July 2020 following three rounds of consultation. It articulates why a comprehensive and coordinated approach is crucial to deliver the development objectives (including new homes, employment benefits, industrial intensification, sustainable transport connections, a new bridge link with Murphy's Yard and new public realm and green spaces) and makes it clear that piecemeal planning applications will be resisted. It is a material consideration in the assessment of development proposals. The Appeal scheme would significantly harm LBC's ability to achieve key KTPF objectives.

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 all industrial floorspace were to be re-provided at the plot level it would be dispersed across the RRGAs with harmful consequences for 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.

Self-contained housing is the Council's priority land use which is consistent with the importance given to housing in the NPPF, London Plan and reflected in recent government announcements, all of which seek to unlock housing delivery. Camden is under-performing in terms of housing delivery, placing even greater weight on housing in decision-making. A large proportion of Camden's new homes will be located in Growth Areas with Regis Road identified as having capacity for 1,000 new homes in the draft Site Allocation and Kentish Town Planning Framework. The Appeal site is very well suited to housing and meets the criteria of both the London Plan and Local Plan insofar that it is under-utilised brownfield land, in a highly accessible location and with scope for industrial floorspace to be provided alongside as part of a mix of uses. The GLA chose Regis Road as one of its six pilot studies for intensifying industrial provision alongside housing delivery. The Kentish Town Planning Framework (KTPF) supports this approach through exploring how housing can be co-located alongside industrial intensification.

The London Plan (policy H1) requires boroughs to look to brownfield sites, particularly industrial sites (subject to other provisions) as well as highly accessible sites, as potential areas to optimise housing delivery. Policy E7 presents no issue here as the site has been allocated and there is scope to include industrial floorspace as part of mixed-use intensification.

The CLP (policies G1 and H1) expects housing to be provided as a mix of uses where possible with H1 requiring the maximum amount of housing where sites are underused or vacant, provided it is compatible with other required uses. The proposed use is relatively benign and could be co-located with housing as Big Yellow has achieved on other sites, and as the KTFP advocates through its focus on co-locating through innovative typologies.

The indicative masterplan submitted by the Appellant claims to achieve the Council's objective of 1,000 homes yet these are dependent on the whole GA coming forward for comprehensive development with no regard to any plot boundaries save those of the Appeal site. There are many shortcomings of the indicative masterplan but what it demonstrates is how a masterplan-led comprehensive approach is required in order to achieving the Framework objectives. For a piecemeal approach to deliver what is expected of the area, it would need to contribute comprehensively towards housing (including affordable housing), industrial floorspace, open space and infrastructure. There are significant difficulties with achieving this effectively on each plot and the Appeal Scheme certainly does not do this.

In terms of the planning balance of the proposal, I assign limited weight to the alleged public benefits which largely comprise economic benefits including direct employment creation (3-4 end use jobs), temporary construction-phase employment (including apprenticeships) and a small amount of affordable workspace. I consider the indirect employment benefits to be highly inflated due to dubious and opaque methodology. They are also largely outside of the Appellant's control.

The public benefits fail by a significant margin to outweigh the considerable harm the scheme represents to both the Council's and the community's vision and objectives for the RRGAs, as well as the harm derived from a poorly designed building on the character and appearance of the area. Establishing a piecemeal approach to the redevelopment of the RRGAs would have severe and permanent consequences for the Council's ability to deliver on its strategic aims.