

PLANNING SERVICES**TOWN & COUNTRY PLANNING (DETERMINATION BY INSPECTORS)
(INQUIRIES) RULES 2000****PROOF OF EVIDENCE**

of **GAVIN SEXTON BEng MA**

FOR PUBLIC INQUIRY COMMENCING ON 21 MAY 2024

APPEAL SITE

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

APPELLANT

Big Yellow Self Storage Company Limited

SUBJECT OF APPEAL

Appeal Statement in Support of the Council's decision to refuse Full Planning Permission application (ref: 2023/0093/P) on 25th August 2023 for:

"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. INTRODUCTION

- 1.1 I, Gavin Sexton (BEng, MA), have prepared this proof of evidence for presentation at the Public Inquiry into the appeal. My qualifications and experience are set out in Appendix A. The evidence that I have provided for this appeal is accurate to the best of my ability and I confirm that any professional opinions expressed are my own.

2. Scope of my evidence

- 2.1 I will address the effect of the proposal when considered in isolation as part of the Regis Road Growth Area (RRGA) on the development strategy for the area, relating to the Council (“LBC’s”) first Reason for Refusal (“RfR1”)¹.
- 2.2 I will summarise the development strategy for the area and focus in particular on the importance of comprehensive consideration of redevelopment in the RRGA. I will then address how the Appeal proposal would harm that strategy and how it would significantly hamper delivery of LBC’s aims for the Area.
- 2.3 I have framed my evidence in the form of a response to each of three questions:
- i. **What is the development strategy?**
 - ii. **Does the development strategy need to pursue a comprehensive approach?**
 - iii. **What would be the effect of the proposal on the development strategy?**
- 2.4 I will show how the Council (“LBC”) is making progress with stakeholders on a masterplanned approach to the RRGA.
- 2.5 Then I will set out the importance and validity of the Council’s requirement for a comprehensive approach.
- 2.6 Finally I will examine the weaknesses of the Appellant’s scheme and illustrative masterplan in relation to the development strategy.

¹ Core Doc 8.1 LPA Statement of case para 5.1.1

3. APPEAL SCHEME

- 3.1 The Appeal Scheme comprises office and warehouse uses in a 17m high building, with vehicular access via the existing link to RR.

4. What is the development strategy?

4.1 The Regeneration Strategy for Regis Road (RSRR) is LBC's development strategy for the RRGAs². A wide range of workstreams and initiatives support the implementation of the Strategy, with key ones expanded upon below:

- A. LBC land sale as a catalyst to deliver regeneration
- B. Masterplanning approach to prepare adoptable addendum to KTPF
- C. Service re-provision strategies
- D. Appropriation and CPO strategy

A. *Camden land sale as a catalyst to deliver regeneration*

4.2 Through the development strategy LBC has committed land³ and resources⁴ to help unlock the potential of the RRGAs and transform the site into a new thriving neighbourhood. Appendix B identifies key obligations of the Conditional Land Sale Agreement (CLSA) with Yoo Capital (YC). YC are carrying out public facing activities in compliance with the obligations of the CLSA⁵, including:

- a) preparation and delivery of a comprehensive Masterplan in a collaborative approach with key stakeholders and landowners' and
- b) working towards achievement and implementation of planning permission for a meaningful Phase 1⁶ of the Camden Film Quarter.

4.3 These activities are complemented by YC's other programmes of work for delivering the Camden Film Quarter (CFQ), which include attempts to acquire further land within RRGAs, negotiations to secure occupiers of the CFQ⁷, planning for re-provision of housing and Council services as part of Phase 1

² Appendix C for a summary of activities in support of comprehensive delivery of RRGAs

³ CD 8.12 Joint press release by LB Camden Yoo Capital 18/03/23

⁴ CD 8.6: Budget for Regeneration strategy for the Kentish Town Regis Road Growth Area project.

⁵ CD 13.5 Updated and amended Appeal statement by Camden Film Quarter to Planning Inspectorate re Appeal by Big Yellow with Appendix. Dated 22/04/24

⁶ Section 'Submission of Planning Application' & attached Plan in CD 13.5 Appeal statement by CFQ to PINS 22/04/24

⁷ Core Doc 8.18 press article 02/04/24, 8.19 press article 25/03/24 and 8.20 press article 01/02/24

and individual engagement with local stakeholders and landowners as part of the masterplanning approach⁸.

B. Masterplanning approach to prepare adoptable addendum to KTPF

- 4.4 LBC has agreed a Planning Performance Agreement (PPA) with YC⁹ to provide a project management framework for preparing and progressing a masterplan for the RRGAs plus relevant adjoining sites (fig 1)¹⁰, delivering Phase 1 planning permissions.
- 4.5 The PPA sets out how YC will lead preparation of this masterplan and expects YC to collaborate with Joseph Homes (“JH” – see below).
- 4.6 Subject to appropriate statutory requirements for engagement¹¹, review and endorsement, LBC intends to adopt this masterplan¹² as supplementary planning guidance (SPG) in the form of an addendum to the KTPF.
- 4.7 The PPA requires a programme of pre-application work prior to submission of planning applications which will need to comply with policy and the newly adopted masterplan SPG.

⁸ Core Doc 13.5 item 4 page 2 “local area land owners engagement and local area stakeholder engagement”

⁹ Core Doc 8.21 PPA dated 23/04/24

¹⁰ Core Doc 13.5 Appendix.

¹¹ The Town and Country Planning (Local Planning) (England) Regulations 2012 Part 5 Supplementary Planning Documents

¹² See Ms Smith Proof Appendix C

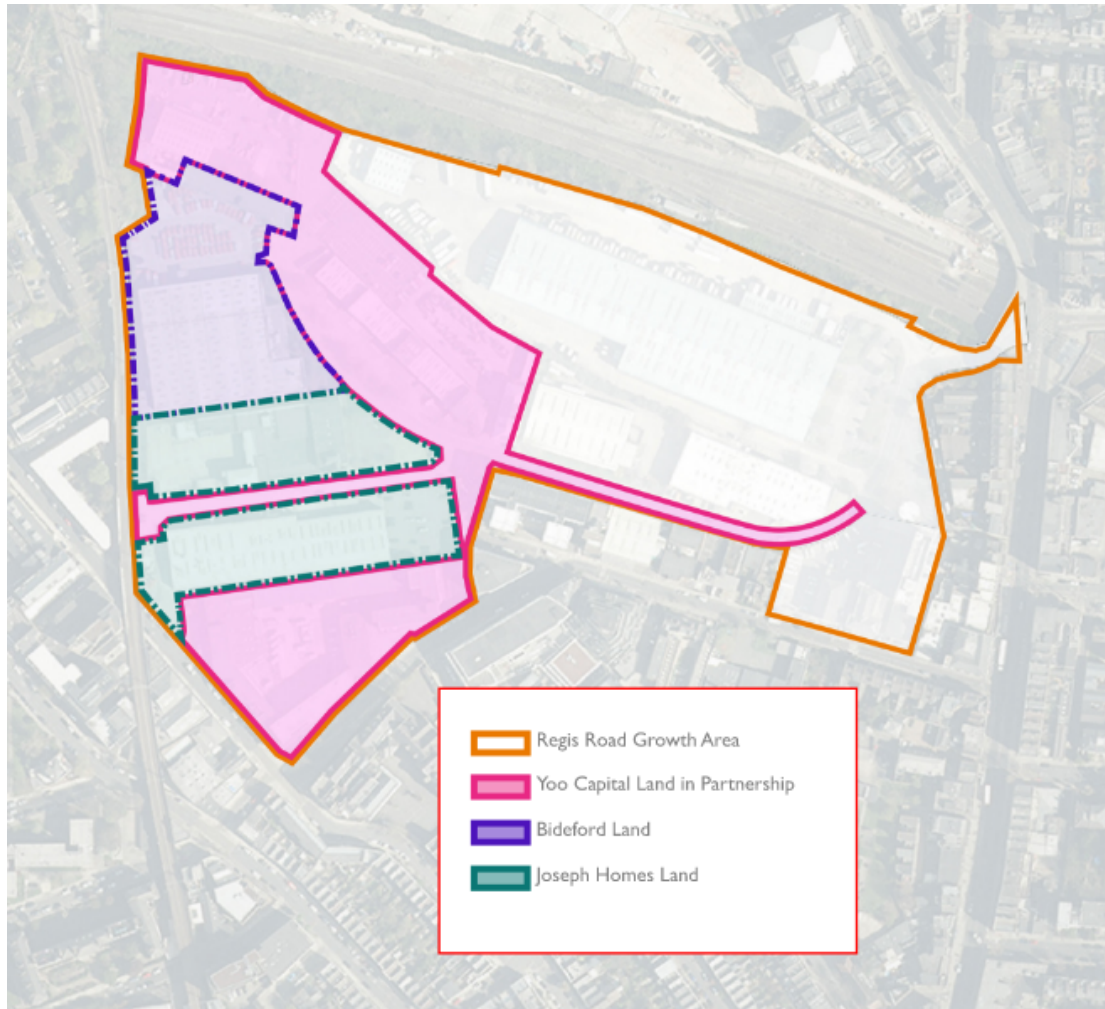


Figure 1: Masterplan and Planning application areas covered by PPA

4.8 The Council is also negotiating a PPA with JH, relating to planning proposals for their landholdings in a manner which is consistent with YC's masterplan approach. The PPAs expect the two developers to co-ordinate their respective proposals, which need to take account of engagement with other key stakeholders including other landowners and the community.

C. Service re-provision strategies

4.9 My Appendix C, 'Post-exchange activities by LBC', identifies a range of activities being carried out by LBC to prepare service re-provision and housing re-location strategies¹³ to ensure 'seamless' re-provision of the Recycling Centre, housing and Council services, at the appropriate time. Location and

¹³ Appendix C and Code Doc 8.1 LPA Statement of case paras 6.22 and 6.23

design of depot and car-pound re-provision will influence the masterplan and Phase 1 delivery and are therefore being considered at a strategic level by LBC¹⁴.

D. Appropriation and CPO strategy

- 4.10 The November 2022 Cabinet decision¹⁵ included delegating authority for decisions in relation to appropriation of land and in-principle authorisation for the exercise of LBC's powers of compulsory acquisition.
- 4.11 In March 2024 YC requested that LBC confirm that appropriation powers shall be used for the Holmes Road Depot site and the Regis Road Recycling Centre site. As the masterplanning approach proceeds it is evident that the Council is likely to need to continue its enabling role to support comprehensive delivery to ensure that Council priorities for the RRGAs¹⁶ are achieved.
- 4.12 These factors have highlighted the need for a cohesive strategic approach which will ensure that the best regeneration outcomes can be formulated. A combined Appropriation and CPO Strategy (ACPS) will be prepared alongside the YC-led masterplan activities. This will align it to the emerging guidance, enable it to influence the emerging masterplan and be best placed to facilitate Council policy objectives for RRGAs. Authorisation for the ACPS has been agreed by the Cabinet Member¹⁷ and senior officers. The ACPS confirms the Council's strategic commitment to considering use of CPO powers to deliver housing, economic intensification and a transformed environment in the RRGAs.

¹⁴ Core Doc 8.14 LBC Depot Strategy by Proun: A review of current specified depot sites and possible ongoing strategy

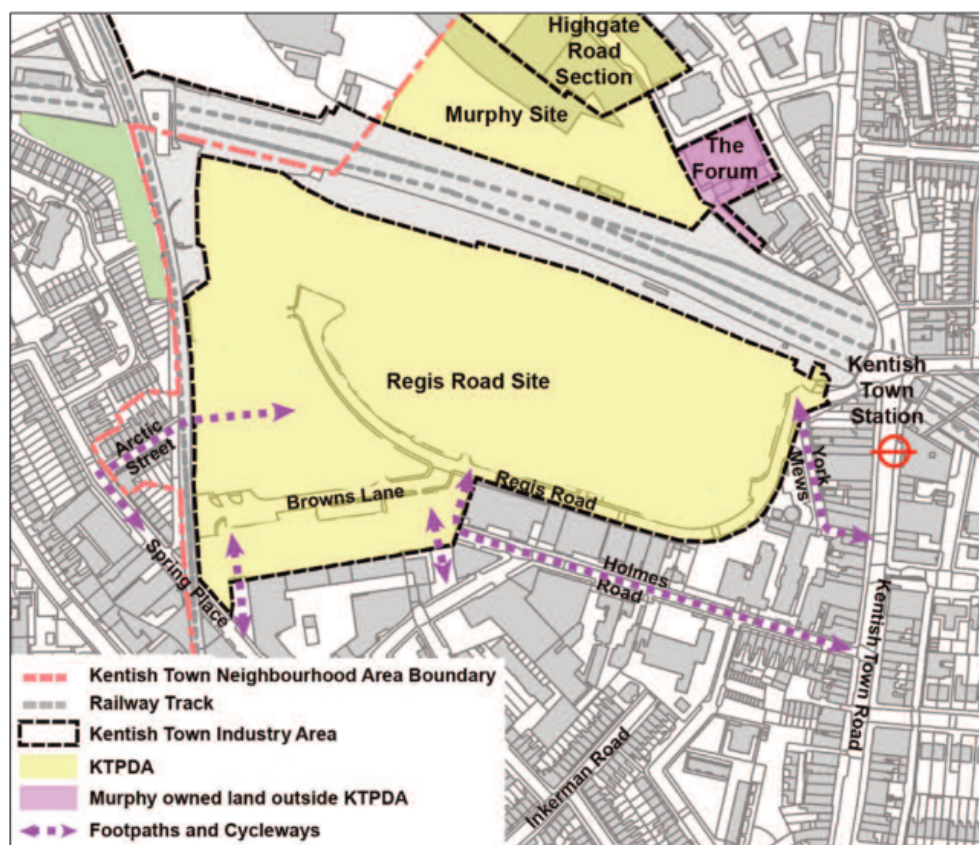
¹⁵ Core Doc 8.5 Cabinet report 16/11/22 Regeneration Strategy for Regis Road

¹⁶ Core Doc 4.2 Camden Local Plan July 2017 Policy G1 para 2.32-36 Kentish Town Regis Road Priorities/Principles

¹⁷ Core Doc 8.7 Strategy for the Potential Use of Legal Powers

5. Does the development strategy need to pursue a comprehensive approach?

5.1 A comprehensive approach to development across the RRGa is needed in order to achieve development in line with policy and the KTPF, as explained by Dr Holbrook and Ms Smith.



▲ Map 10: Provision of new footpaths and cycleways into Regis Road Site

Figure 2: MAP 10 supporting policy SP2a in KTNP

5.2 KTNP Policy SP2a¹⁸ includes expectations about the delivery of community and public facilities, new public open space and affordable housing within the 'significant development opportunity'¹⁹. The Policy Specific Criteria focus on creating new and improved routes and connections to the wider area. CLP's priorities²⁰ reinforce KTNP SP2a, requiring 'the overall design of the area' to

¹⁸ Core Doc 5.2 Kentish Town Neighbourhood Plan: Policy SP2a General Crite

¹⁹ Core Doc 5.2 Kentish Town Neighbourhood Plan : p43 (SP2 supporting text) :

"Policy SP2 promotes an increase of industrial floorspace in KTPDA. The Neighbourhood Forum recognises that there is a significant development opportunity in the Potential Development Area. Policy SP2 therefore supports the redevelopment of this area whilst acknowledging that the appropriateness of the policy considerations may vary in different sections of it"

²⁰ Core Doc 4.2 Local Plan July 2017 Policy G1 Kentish Town Regis Road priorities paras 2.32-36

create / reinstate pedestrian / cycling connections, provide substantial new open space and secure improved public realm, facilitate and allow links to future development of adjoining sites and fully explore opportunities for comprehensive wider development. KTPF's spatial vision²¹ for RRGa identifies a transformed neighbourhood, with new social and physical infrastructure supporting intensified and diversified uses. These wider site requirements necessitate a comprehensive approach.

- 5.3 The comprehensive approach was endorsed by the GLA²² and was intrinsic to the joint LBC/GLA brief for 5th Studio to examine the design options for the area.
- 5.4 Through various initiatives to support delivery at RRGa²³ LBC has remained committed to pursuing a comprehensive approach²⁴. The value of maintaining this course was demonstrated by the pilot Industrial Intensification Delivery Strategy (IIDS) study into development scenarios in the RRGa. The Study²⁵ identified that the limitations of the plot-by-plot approach would deliver significantly fewer new homes and less public open space than the comprehensive scenarios which were explored. The Study outputs also showed how the plot-by-plot approach would fix elements such as Regis Road in place, thereby limiting the scope for the transformative and qualitative improvements needed to support a distinct new neighbourhood, in particular to deliver public benefits such as public realm improvements, creating pedestrian & cycling route connections²⁶.
- 5.5 These issues mean that the non-comprehensive approach, exemplified by the appeal proposals, would fail to promote the quality of connections and place-making which the Council's policy and Framework principles require.

²¹ Core doc 5.12 Kentish Town Planning Framework

²² Core Doc 8.8 : GLA Report DD2435 19 12 19 IIDS appointment of design team for Regis Road para 2.1: *"the objectives of the Regis Road , Kentish Town, Pilot Area IIDS, as agreed by the GLA and the LBC are to : deliver the comprehensive employment-led redevelopment of Regis Road in accordance with the aspiration of LBC's draft SPD for Kentish Town"*;

²³ Core doc 8.5 Cabinet Report 16/11/22 RSRR Appendix 2

²⁴ From the Neighbourhood Plan, through the Local Plan to the guidance in the Kentish Town Planning Framework, the LPA has recognised the wider value which can be achieved from the comprehensive consideration of redevelopment.

²⁵ Core doc 8.9 Regis Road Study report by 5th Studio July 2021

²⁶ Core Doc 4.2 Camden Local Plan Policy G1 Kentish Town Regis Road policies and priorities 2.35..

- 5.6 Such fixes would also mean that the optimal locations for delivery of significant physical or social infrastructure may result in unequal distribution of expectations on individual sites. The absence of any consideration of a strategic mechanism for delivery of wider facilities and infrastructure is an endemic weakness of the piecemeal approach.
- 5.7 The study identifies the UPS site as a key challenge in realising the full extent of the comprehensive aspirations for the RRGAs. UPS were sufficiently engaged in the IIDS work to share sensitive information to allow consideration of options that respond to their need for operational continuity while intensifying use of their site within a wider masterplan. Their active participation paused with the completion of the study, but that does not preclude potential intensification of their site in a later phase. While the Study confirmed the complexity, constraints and challenges of the project, it resolved that a masterplan should be prepared in order to deliver the objectives of comprehensive development.
- 5.8 These considerations show that illustrating comprehensive development in a masterplan can only lead to a fully realisable redevelopment when undertaken as part of a collaborative or co-ordinated exercise, requiring input from key stakeholders to help resolve key issues and obstacles²⁷. This is particularly important in a context where the wider site is in multiple ownership. CLP and KTNP²⁸ recognise that the process involves multiple parties and will require collaboration.

²⁷ Core Doc 8.9 Regis road Study 5th Studio Report: p5 'next steps' :

'The process of masterplanning can be instrumental in building a unifying and resilient strategic narrative to achieve buy-in, consensus and guide coordinated positive change'.

²⁸ Core Doc 4.2 Camden Local Plan July 2017 para 2.32 and Core Doc 5.2 Kentish Town Neighbourhood Plan multiple references as follows:

- Introduction (p8) *'Another policy is the coordinated redevelopment of the Kentish Town Potential Development Area..'*;
- Spatial policies 7b p13 *'KT Neighbourhood Plan will promote a coordinated redevelopment of the Kentish Town Potential Development Area'*;
- Spatial policy preamble p38 *'The Spatial Policies set out the framework within which proposals should be considered and together with the Project, seek to ensure a coordinated approach to the multiple strands of action required to realise the potential of the area'*;
- SP2 supporting text p43 *'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'.*

- 5.9 The Cabinet report recommending adoption of the RSRR notes four possible delivery options²⁹, from a laissez-faire approach to using Compulsory Purchase powers and/or the GLA Land Fund to support wholesale assembly of land. The identification of options demonstrates that the Council is alive to the challenges of bringing forward the RRGAs site, and committed to the flexible exploration of options to find practical and viable means of delivery. The RSRR also identifies the collaboration as key to achieving a comprehensive approach, which underpins the first two objectives of the Regeneration Strategy³⁰.
- 5.10 The Appellant has suggested that the LBC's preference for a single application to secure a comprehensive scheme for development of RRGAs presents a key obstacle to the realistic prospect of securing comprehensive development³¹. While a single planning application would, perhaps, be the clearest route to securing planning certainty of eventual outputs, the RSRR raised the possibility of flexibility and acknowledged that more than one planning application may be required in order for redevelopment to take place³². However, the RSRR maintains the emphasis on the need for a comprehensive approach via a masterplan and associated delivery proposal to be prepared in collaboration and/or partnership with landowners and developers³³. The process for achieving an agreed comprehensive development approach to the Growth Area described above is a clear sign of LBC's willingness to take a pragmatic and practical approach to achieving its policy objectives. This does not mean that LBC endorses the Appellant's plot by plot approach, which is clearly not in

²⁹ Core Doc 8.5 Cabinet Report Regeneration Strategy for Regis Road Section 3 "Options Appraisal" paras 3.1 to 3.6

³⁰ Core Doc 8.5 Cabinet Report RSRR Section Para P2.2:

1. *enable and catalyse the comprehensive regeneration of the Regis Road Growth Area;*
2. *enable the comprehensive delivery and masterplan-led approach to deliver the objectives of the Kentish Town Planning Framework – to create a new innovative mixed-use neighbourhood of up to 1,000 new homes including affordable homes, employment space and jobs, open space and connections with surrounding communities such as Gospel Oak;*

³¹ Core Doc 7.1 Appellant Statement of Case – para 4.9, 4.28.

³² Core Doc 8.5 Cabinet report para 5.2:

"Engagement has also taken place with landowners and this forms part of an ongoing dialogue. For redevelopment to take place, a planning application, or applications, will be submitted and, in advance of any submission, extensive local engagement will be required as the redevelopment proposals evolve."

³³ Core Doc 8.5 Cabinet report para 2.9key workstreams include

"A masterplan and delivery proposal through collaboration and/or partnership with landowners and potential developers including consideration of the enabling role of Council's land assets;"

accordance with the conclusions of 5th Studio's Study and the provisions of the development plan and KTPF.

- 5.11 The stakeholder and wider engagement work currently being undertaken by YC³⁴ in preparation of a masterplan demonstrates a commitment to action. YC have committed to ensuring that planning permission is sought for a meaningful Phase 1, comprising applications for more than 50% of the land within the RRGAs. Development proposals for subsequent phases will be strongly encouraged by LBC, so long as they are demonstrated to be in accordance with the masterplanning outcomes.
- 5.12 It is evident from the scope and extent of live activities listed above, that the Council has made and continues to make significant advances in bringing forward a masterplan for the RRGAs. YC's success in and ongoing commitment to land assembly³⁵ and the collaborative masterplanning process³⁶, and the Council's agreement to prepare an ACPS demonstrate the shared commitment to a masterplan, as anticipated by the development strategy, which together will respond to the policy aspirations and the practical considerations of land ownership, phasing, viability and deliverability.

³⁴ See camdenfilmquarter.com and associated commonplace website for details of engagement in w/c 15th April 2024

³⁵ Core Doc 8.13 Press release by YC

³⁶ Core Doc 13.5 CFQ Letter to PINS

6. What would be the effect of the proposal on the development strategy?

- 6.1 The Appellant instructed BYSS to prepare illustrative masterplans³⁷ although no information is provided about the process of preparation. Given the Appellant's statements on the role of other landowners³⁸, their misunderstandings about the motivation of Bideford Ventures and Joseph Homes³⁹ and their own resistance to pursue offers of either alternative sites and/or more floorspace⁴⁰ as part of a masterplan, it seems likely that no stakeholders were meaningfully involved in the activity. The Council was not consulted, either as LPA or as landowner.
- 6.2 Multiple ownerships within the RRGAs add complexity to delivering comprehensive development and a masterplan is an essential means to respond to this constraint. Despite acknowledging this⁴¹ the Appellant's indicative masterplan⁴² gives limited consideration to the role of site ownership other than their own.
- 6.3 A masterplanning approach which brings consultation, co-operation and collaboration to problem solving the practical issues of comprehensive development and which is supported by evidenced plans and strategies, is essential to creating a robust and deliverable masterplan which is capable of achieving its key aspirations⁴³.
- 6.4 On the other hand, presenting a plan-based⁴⁴ illustrative masterplan without supporting evidence which demonstrates how it could be delivered and without demonstrable input or support from at least some of the affected landowners or key stakeholders, is a paper exercise of very limited value. Notwithstanding

³⁷ Core doc 7.2 Appellants Design Statement para 3.9

³⁸ Core Doc 7.1 Appellants SoC p4.11: "Several landowners have expressed their unwillingness to collaborate in the development of comprehensive masterplan" and 4.12 : "it is the Appellant's understanding that there are other key landowners that are unwilling to collaborate"

³⁹ Core Doc 7.1 Appellants SoC para 4.17 "we understand that Bideford Ventures, Joseph Homes and UPS are not currently interested"

⁴⁰ Core Doc 7.1 Appellants SoC para 4.16 "the appellants confirmed to Yoo Capital that they were not interested in either and that remains the case".

⁴¹ Core Doc 7.1 Appellants SoC section Landownership Constraints para 4.10-4.19.

⁴² Presented in Core Doc 7.1 Appellants SoC para 4.33-4.38; and discussed in Core Doc 7.2 Appellants Design Statement 4.33 to 7.24 "we have developed this masterplan to suggest one way that a comprehensive development could be brought forward over the Regis Road area while achieving the goals set out in the KTPF".

⁴³ For example ability to deliver the qualities of 'Regis Road' expected by the KTPF principles

⁴⁴ See Core Doc 8.4 Proof of Evidence of Dr Tom Holbrook Appendix 3 for further details of plan-based land designation vs design-led spatial planning.

the statement that *'the purpose of the masterplanning exercise was to show that the Council's aspirations for the wider site could still be delivered...'*, the absence of any indication as to how it would co-ordinate practical development means that it cannot be considered to be a deliverable masterplan.

- 6.5 The Appellant's illustration of the Appeal Scheme within an undeliverable and un-coordinated masterplan does not demonstrate that their proposal is anything other than piecemeal. It is subject to the same faults and weaknesses as the plot-by-plot scenario examined in the Study by 5th Studio⁴⁵.
- 6.6 Overall, the appeal scheme would significantly hamper the intentions of the development plan and the aspirations of the KTPF for RRGAs, by fixing elements in place which would hinder the ability of a masterplan to transform the quality and character RRGAs⁴⁶, by failing to take account of the wider considerations for optimising land and co-locating land uses, social and physical infrastructure⁴⁷, and by failing to properly consider the interfaces with future neighbours⁴⁸. These issues fundamentally undermine the Appellant's assertion⁴⁹ that *"the appeal scheme would sit comfortably within and complement any future comprehensive redevelopment of the Growth Area"*.

⁴⁵ Core Document 8.9

⁴⁶ See Dr Holbrook Proof 5.4-5.5 and para 5.4-5.6 of my proof

⁴⁷ See Dr Holbrook Proof 6.5-7, 6.9, Ms Smith proof section Housing, and para 5.5 of my proof

⁴⁸ See Dr Holbrook proof 7.8

⁴⁹ Core Doc 7.1 Appellants SoC para 4.33

7. Conclusions

- 7.1 In my proof I have summarised how a comprehensive approach is required to create the transformative change needed to deliver the quality and scope of public benefits expected of the RRGAs. I have set out how LBC has made facilities and homes available for redevelopment through a conditional land sale to YC in order to catalyse the comprehensive regeneration and support the Council's commitment to a new future for the RRGAs. I have summarised how LBC has agreed a masterplanning approach which will direct future development, with support from YC and JH. Meanwhile, the Regeneration Team is progressing key workstreams to support and complement the masterplanning approach.
- 7.2 The Council's development partner YC has secured development partnerships across one-third of the RRGAs (see Figure 1) and is in discussion with other landowners about further development potential⁵⁰. LBC has shown leadership and pragmatism in its development strategy, by agreeing to a conditional land sale, agreeing to a process for adopting a masterplan, committing significant resources to implementing the RSRR and making preparation for potential use of its land appropriation and compulsory purchase powers. LBC is actively working to achieve the significant public benefits that would accrue from a comprehensive approach to development across the RRGAs.
- 7.3 LBC expects YC's masterplan approach to be inclusive and involve key stakeholders, which include the appellant. If the appellant were to collaborate in the masterplanning approach alongside other landowners and LBC, it would provide an opportunity for a development proposal on their site which responds to the development plan and the development objectives of the KTPF, and which and contributes to the quality and ambitions of an agreed and deliverable masterplan.
- 7.4 The Council is confident that the agreed process for demonstrating how the KTPF aspirations can be achieved will deliver a masterplan, paving the way for

⁵⁰ Masterplan principles, slide 4 of 12 in Yoo Capital public engagement material 16/04/24: , <https://camdenfilmquarter.commonplace.is/proposals/cfq-masterplan-vision/step4>

planning applications and subsequent delivery. Therefore the appellants assertion that *“the only realistic means of achieving the Council’s aspirations for the Growth Area is to allow individual schemes to come forward...”* is incorrect and under-estimates the value and importance of the comprehensive approach and the commitment of key stakeholders to its preparation.

- 7.5 YC’s acquisition⁵¹, negotiation and engagement activities demonstrate that they are an active catalyst to development at RRGa. Their vision for the Camden Film Quarter has captured local interest and has secured commitments from business and film industry interests to play a role in the development⁵². Landowners are showing signs of being responsive to YC’s masterplanning approach⁵³. However the process of building trust requires further relationship-building with stakeholders and in particular with landowners, and extensive and complex negotiation.
- 7.6 If the appeal were to be allowed, it could be perceived by landowners as an endorsement of the Appellant’s commitment to a contrary piecemeal approach and their resistance to playing a constructive role in a masterplan approach⁵⁴. This would risk stalling or even undermining of the process, and jeopardise delivery of the Council’s aims and aspirations for the RRGa.
- 7.7 For the above reasons, the Inspector is respectfully requested to dismiss the Appeal.

⁵¹ Core Doc 8.13 Press Release by Yoo Capital 15/03/24.

⁵² Core Docs (Press articles from Camden New Journal) 8.18, 8.19 and 8.20

⁵³ Core Doc 13.5 CFQ Letter to PINs 22/04/24

⁵⁴ Core Doc 7.1 Appellants Statement of case para 4.16

LIST OF APPENDICES

Appendix A	Qualifications
Appendix B	Appendix B: key obligations of Conditional Land Sale Agreement
Appendix C	Summary of activities in support of comprehensive delivery of RRGAs

GLOSSARY FOR PROOFS OF EVIDENCE PRODUCED BY LONDON BOROUGH OF CAMDEN

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. Adopted 2017.
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

Appendix A. Qualifications

- 1.1 I hold a Bachelor of Engineering in Electronic Engineering, and a Masters of the Arts in Town Planning from Dublin City University and London South Bank University respectively.
- 1.2 I am Area Regeneration Manager in Regeneration and Planning, at London Borough of Camden (LBC). I have worked at LBC since July 2005, when I started as a planner for the local planning authority (LPA). Between 2005 and 2023 I worked on a range of planning responsibilities, including major developments across a mix of uses. Since 2018 I have led the Council's planning involvement in masterplanning the future of over-site development at Euston. Since the autumn of 2023 my main responsibility has been leading the Council's implementation of the Regeneration Strategy for Regis Road (RSRR) as part of the Area Regeneration Team.

Appendix B: key obligations of Conditional Land Sale Agreement

- *To collaborate with LB Camden to deliver a Masterplan Vision over the full extent of the Regis Road Growth Area and develop a Masterplan that facilitates the delivery of the Camden film Quarter.*
- *To undertake the delivery of the Masterplan Vision, branded as 'Camden Film Quarter'.*
- *To engage local landowners regarding the Masterplan Vision and provide technical assistance/guidance to encourage landowners to bring forward sites for development in accordance with the Masterplan.*
- *Use all commercially reasonable endeavours to acquire further sites within the Regis Road Growth Area.*
- *Secure satisfactory policy compliant planning permission to be achieved in line with the principles of the Planning Framework*
- *Completion of build-out of the proposed scheme by a specified long-stop date, with the Council able to take the land back if this is not achieved*
- *Significant provision of new homes of which at least 50% must be affordable housing (in addition to the re-provision of existing homes of Council tenants at the Holmes Road Depot site)*
- *Re-provision of the existing facilities currently on the two Council owned sites, including the existing homes*
- *Agreed target dates to be achieved to ensure that regeneration is carried out in a timely manner`*
- *Freehold to be retained by the Council*
- *A capital receipt delivered to the Council which has been professionally assessed as amounting to "best consideration" market value."*

APPENDIX C: Summary of activities in support of comprehensive delivery of RRGAs

Timeline	Activity	Comments/observations
Jan 2012	First KTNF AGM	
2008 to 2010	Camden Core Strategy Adoption in Nov 2010.	Safeguards employment designation of Kentish Town Industry Area
2013 to 2017	Camden Local Plan Engagement 2013 to 2014. Draft local plan February 2015. Submission Draft consultation Feb – April 2016 Adopted 03/07/2017	<p>The Local Plan split the designation of Kentish Town Industry Area into</p> <ul style="list-style-type: none"> • Regis Road Growth Area and • Kentish Town Industry Area <p>Local Plan policy G1 (Delivery and Location of Growth) requires development in [Kentish Town Regis Road] growth area to be consistent with the area policies and principles</p> <p>KTRR priorities and principles include:</p> <ul style="list-style-type: none"> • Employment-led as part of a comprehensive scheme; • Planning Framework to be prepared; • A mix of uses; • Retention of existing businesses; • Significant number of new homes; • Development to facilitate and links to future development of adjacent sites;
2013 to June 2017	Kentish Town Neighbourhood Plan (KTNP) Preparation by KT Neighbourhood Forum.	<p>The Neighbourhood plan recognised the potential of the KTPDA for a <u>mixed use</u> development;</p> <p>Plan gave commitment to the benefits of a comprehensive approach.</p>

Timeline	Activity	Comments/observations
	<p>Engagement 2013-2015.</p> <p>March 2015 Draft KTNP presented to community.</p> <p>Adopted by LBC 19 Sept 2016</p>	
Feb 2018 to July 2020	<p>Kentish Town Planning Framework</p> <p>Preparation Feb 2018 to 2020</p> <p>Adopted 17th July 2020</p>	<p>The Kentish Town Planning Framework 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.</p>
Jan 2020 to July 2021	<p>Collaboration with Housing & Land Directorate at the GLA on pilot study for Industrial Intensification Delivery Strategies programme.</p> <p>Led to completion of study 'Regis Road Kentish Town Pilot Area – Industrial Intensification through Colocation' in June 2021 by 5th Studio.</p>	<p>In supporting the Council, the GLA attempted to utilise the Mayor's Land Fund to acquire sites and Regis Road to facilitate land assembly. However, when sites have become available, it has not been possible to meet market expectations and GLA have so far not made any acquisition for land assembly</p> <p>Report by 5th Studio carried out as part of IIDS pilot study which sought to provide a deliverable framework and design proposition for how sites on industrial land (designated and non-designated) can be intensified and consolidated to protect and enhance capacity, whilst allowing for release in parts to accommodate housing delivery to meet multiple objectives.</p> <p>The design work was intended to provide a deliverable masterplan for the currently fragmented Regis Road Growth Area that reflects the ambitions of the Kentish Town Planning Framework, and policy E7 of the London Plan.</p>
June 2021	Acquisition of Alpha House by Big	As recorded by Kentish Town Neighbourhood Forum in letter to PINs

Timeline	Activity	Comments/observations
	Yellow	18.3.24
August 2023	Joseph Homes announce purchase of Fairfax Meadow site	
2016 to March 2021	The London Plan March 2021 Adoption by GLA	
16 November 2022	Regeneration Strategy for the Kentish Town Regis Road Growth Area SC/2022/23	<p>Cabinet agreed the regeneration strategy to ensure the Council is taking a pro-active and holistic approach to the growth area, creating a catalyst for the regeneration.</p> <p>Key objectives:</p> <ul style="list-style-type: none"> • enable and catalyse the comprehensive regeneration of the Regis Road Growth Area. • enable the comprehensive delivery and masterplan-led approach to deliver the objectives of the Kentish Town Planning Framework – to create a new innovative mixed-use neighbourhood of up to 1,000 new homes including affordable homes, employment space and jobs, open space and connections with surrounding communities such as Gospel Oak. • enable ‘seamless’ reprovision of the Recycling Centre and other Council service provision as necessary to support the Regeneration Strategy. • support land assembly and coordination within and between land parcels and ownerships; and • to deliver ‘best consideration’ capital receipt in the event of land disposal.
10 March 2023	Implementation of the Regeneration Strategy for the Kentish Town Regis	Single Member Decision approving the Council entering into the conditional land sale agreement with the authority to dispose of the two Council sites (subject to planning) including the heads of terms.

Timeline	Activity	Comments/observations
	Road Growth Area (SC/2023/15) Cabinet Member approval.	
3 April 2023	Call-in – Implementation of the Regeneration Strategy for the Kentish Town Regis Road Growth Area (SC/2023/15) Agreed by Culture and Environment Scrutiny Committee	The matter was considered at a special meeting of the Culture and Environment Scrutiny Committee – approving the original decisions of the Cabinet Member, with the decision taking effect from the date of the meeting.
4 April 2023	Implementation of Regeneration Strategy for Regis Road and Kentish Town Growth Area - Approval of terms of conditional land sale agreement Approval by Executive Director Supporting Communities.	Executive Director approval (in consultation with the Cabinet Member for New Homes, Jobs and Community Investment) to the final terms of the conditional land sale agreement
5 April 2023	Conditional Land Sale Agreement exchanged with Yoo Capital.	Sale of Council service sites and homes to catalyse and enable development.
August 2023 to March 2024	LBC commission preparation of Depot Strategy	Proun's brief is to deliver a comprehensive review of LBC's existing depot assets, including compiling the research which identifies the sites, their use, the stakeholders using the sites and an assessment of the efficiency with which sites are being used. The compiled research will inform a borough-wide strategy for the rationalisation, inclusive of costs, of LBC's depot assets.

Timeline	Activity	Comments/observations
		Consideration of options for the re-provision of existing Council depot facilities at Holmes Road and the car pound on Regis Road is a key driver for the depot strategy.
23 Nov 2023	Budget for Regeneration Strategy for the Kentish Town Regis Road Growth Area project. Decision approved by Executive Director Supporting Communities	Non-key executive decision officer agreement of a 5-year budget for resource and consultancy funding to progress the Regeneration Strategy
Nov 2023 to March 2024	Camden engagement with residents of 76/78 Holmes Road	Purpose of engagement: Provide more details about Yoo Capital's role and encourage residents to participate in YC engagement; Find out more about resident's circumstances and housing needs/preferences in order to start preparation of housing options and strategy to achieve vacant possession; Answer questions from residents.
December 2023	Yoo Capital public engagement commences	Three drop-in events were held in the Greenwood Centre, Highgate Road to commence a programme of consultation events with stakeholders and local residents
2023 – ongoing	Yoo Capital engage in an on-going basis with landowners in the RRGAs and with local stakeholders	
Jan 2024	LBC secure external consultancy to advise on Appropriation/CPO matters.	
March 2024	Yoo Capital exchange on the	Acquisition doubles the area of land owned by YC in the Growth Area.

Timeline	Activity	Comments/observations
	purchase (subject to planning) of land at Regis Road plus related sites.	
14 March 2024	Yoo Capital request that Camden Council confirm that appropriation powers shall be used for the Holmes Road Depot site and the Regis Road Recycling Centre site	Request informs decision to seek approval to prepare combined Appropriation/CPO strategy.
19th April 2024	<p>Strategy for the Potential Use of Legal Powers to Support the Regeneration of the Regis Road Growth Area</p> <p>19/04/24: Agreed by Cabinet Member and Chief Exec.</p>	Agreement to prepare a strategy and make preparations for potential use of the Council's land appropriation and compulsory purchase powers and associated actions to progress the Regis Road Growth area development.
16th April 2024	Yoo Capital public engagement commences	Second round of engagement activity focused on masterplan is due to commence spring 2024
April 2024	Planning Performance Agreement between Yoo Capital and LB Camden	
April 2024	Planning Performance Agreement between Joseph Homes and LB Camden	