

PLANNING SERVICES

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

SUMMARY 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

Introduction

- 1.1 I, Gavin Sexton (BEng, MA), have prepared this summary to accompany my proof of evidence for the Public Inquiry into the appeal.
- 1.2 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.
- 1.3 I am Area Regeneration Manager in Regeneration and Planning, at London Borough of Camden (LBC). 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.
- 1.4 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.

Appeal scheme

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

Scope of my evidence

- 1.6 I have framed my evidence in the form of a response to each of three questions:

- A. **What is the development strategy?**
- B. **Does the development strategy need to pursue a comprehensive approach?**
- C. **What would be the effect of the proposal on the development strategy?**

A. What is the development strategy?

- 1.7 The Regeneration Strategy for Regis Road (RSRR) is Camden's development strategy for the Regis Road Growth Area. Four key workstreams which support the implementation of the Strategy are discussed below.

Camden land sale as a catalyst to deliver regeneration

- 1.8 Through the development strategy Camden has committed land and resources to help unlock the potential of the RRGAs and transform the site into a new thriving neighbourhood. The sale of two council sites to Yoo Capital (YC) is subject to the conditional land sale agreement (CLSA). YC are active in the preparation and delivery of a comprehensive Masterplan, collaborating with key stakeholders and landowners, and working towards planning permission for Phase 1 of the Camden Film Quarter.
- 1.9 YC are also attempting to acquire further land within RRGAs, negotiating with future occupiers of the CFQ, planning for re-provision of housing and Council services and carrying out engagement with local stakeholders and landowners as part of the masterplanning approach.

Masterplanning approach to prepare adoptable addendum to KTPF

- 1.10 The Council has agreed a Planning Performance Agreement (PPA) with YC which will set out how YC will lead the preparation and progression of a masterplan for the RRGAs and will deliver Phase 1 planning permissions, as shown in figure 1. The PPA expects YC to collaborate with Joseph Homes ("JH").
- 1.11 Subject to appropriate statutory requirements the Council intends to adopt this masterplan as supplementary planning guidance (SPG) in the form of an addendum to the KTPF.

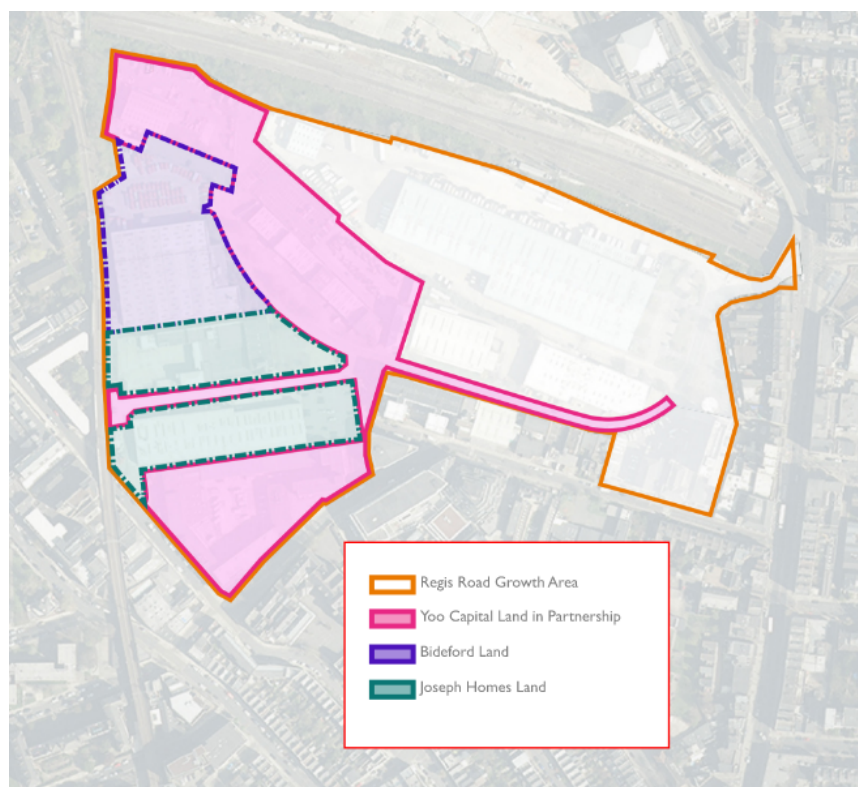


Figure 1: Masterplan and Planning application areas covered by PPA

Service re-provision strategies

- 1.12 LBC is preparing service re-provision and housing re-location strategies to ensure ‘seamless’ re-provision of the Recycling Centre, housing and Council services. Future depot and car-pound re-provision is being considered at a strategic level by LBC.

Appropriation and CPO strategy

- 1.13 Camden’s Cabinet delegated authority for decisions relating to appropriation of land and in-principle authorisation for the exercise of the Council’s powers of compulsorily acquisition at the RRG. As masterplanning 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 RRG are achieved.
- 1.14 There is a 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. The ACPS will align to the emerging guidance, influence the emerging masterplan and facilitate Council policy objectives for RRGAs.

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

- 1.15 As part of the development plan, the KTNP expects delivery of community and public facilities. It includes a focus on new and improved routes and connections to the wider area. Camden's Local Plan reinforce these expectations and place requirements on 'the overall design of the area'. KTPF's spatial vision for RRGAs identifies a transformed neighbourhood, with new social and physical infrastructure supporting intensified and diversified uses.
- 1.16 These wider site requirements necessitate a comprehensive approach.
- 1.17 A joint LBC/GLA brief engaged 5th Studio to examine the design options for the RRGAs. The resulting study showed that the limitations of the plot-by-plot approach would deliver significantly fewer new homes and less public open space than comprehensive scenarios. The piecemeal approach was also shown to limit scope for the transformative improvements needed to support a distinct new neighbourhood, such as public realm improvements and pedestrian & cycling route connections.
- 1.18 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.
- 1.19 The absence of any consideration of a strategic mechanism for delivery of wider facilities and infrastructure is a further weakness of the piecemeal approach.
- 1.20 These considerations show that the masterplan approach must be a collaborative and co-ordinated exercise in order to lead to a fully realisable redevelopment, particularly where the wider site is in multiple ownership.
- 1.21 LBC is willing to take a pragmatic and practical approach to achieving its policy objectives, but this does not mean endorsement of the Appellant's plot by plot approach, which is clearly not in accordance with the conclusions of 5th Studio's Study and the provisions of the development plan and KTPF.

- 1.22 YC's engagement activities in preparation of a masterplan demonstrates their commitment to action. YC will seek planning permission for Phase 1 which will comprise 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.

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

- 1.23 The Appellant instructed BYSS to prepare illustrative masterplans although it seems likely that no stakeholders were meaningfully involved in the activity.
- 1.24 The Appellant's indicative masterplan gives limited consideration to the role of site ownership other than their own.
- 1.25 Masterplanning needs to bring consultation, co-operation and collaboration to solving the issues of comprehensive development and to create a robust and deliverable masterplan which is capable of achieving its key aspirations.
- 1.26 The absence of any indication as to how the appellant's illustrative masterplan would co-ordinate practical development means that it cannot be considered to be a deliverable masterplan.
- 1.27 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.
- 1.28 Overall, as addressed in the Local Planning Authority's three proofs, 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 RRGAs, by failing to take account of the wider considerations for optimising land and co-locating land uses, social and physical infrastructure, and by failing to properly consider the interfaces with future neighbours. These issues fundamentally undermine the Appellant's assertion that *"the appeal scheme would sit comfortably within and complement any future comprehensive redevelopment of the Growth Area"*.

Conclusions

- 1.29 The Council's development partner YC has secured development partnerships across one-third of the RRGAs and is in discussion with other landowners about further development potential. 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.
- 1.30 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 contributes to the quality and ambitions of an agreed and deliverable masterplan.
- 1.31 YC's acquisition, negotiation and engagement activities demonstrate that they are an active catalyst to development at RRGAs. Their vision for the Camden Film Quarter has secured commitments from business interests to play a role in the development. Landowners are showing signs of being responsive to YC's masterplanning approach. However the process of building trust requires further relationship-building with stakeholders and in particular with landowners, and extensive and complex negotiation.
- 1.32 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 approach. This would risk stalling or even undermining of the process, and jeopardise delivery of the Council's aims and aspirations for the RRGAs.
- 1.33 For the above reasons, the Inspector is respectfully requested to dismiss the Appeal.

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