

EXAMINATION IN PUBLIC OF CAMDEN'S LOCAL PLAN

HEARING STATEMENT PREPARED BY DP9 LTD ON BEHALF OF REEF + PARTNERS LIMITED

13 March 2025

Matter 3, Question 25 and Matter 10, Question 1 parts F, G and R

Introduction

1. This Hearing Statement has been prepared by DP9 Ltd on Reef + Partners Limited ("Reef"), specifically in response to Questions raised to both Matters 3 and 10, issued by the Inspector.
2. Reef are a major developer and key stakeholder in the Borough, and this Statement has been made in relation to Reef's most significant active site in the Borough, being the former Parcelforce site at 24-86 Royal College Street ("the Site") which is allocated in the draft Plan at S7 '24-86 Royal College Street'. Reef are also in the process of building out the nearby Tribeca development (ref. 2021/2671/P) delivering a significant quantum of research and development floorspace.
3. This Hearing Statement is submitted following Reef's earlier representations to the Regulation 18 and 19 stages of the draft New Local Plan. This Hearing Statement seeks to reinforce the points made in the previously submitted representations and requests modifications to ensure the policies are justified, effective and consistent with national and regional policy.

Matter 3, Question 25:

4. In particular, this section of the Hearing Statement focusses on the following aspects of Question 25, for Matter 3:

How does the requirement for residential development within non-residential schemes affect the economic objectives of South Camden and the CAZ?

5. The requirement for residential development within non-residentially led schemes could have the potential to negatively impact the economic objectives of South Camden and the CAZ. This is because the wording of Policy H2 is prescriptive and formulaic in its approach and this wording could present a significant challenge to delivering comprehensive development at major sites across the borough. In relation to Reef's Site, this policy, as drafted, could generate a requirement for a quantum of housing that exceeds the indicative site allocation figure.



6. The current wording of Policy H2, as written in the Local Plan (2017), applies to the Central London Area and identified town centres (and excludes the Site). The Draft Local Plan proposes to extend that boundary within the new South Camden sub-area to include the Site. This expansion has not been adequately explained nor justified in the proposed policy.
7. The challenges and costs associated with delivering residential developments in the current market are well understood. The requirements of Policy H2 have the potential to hinder schemes deliverability, on both large and small sites, and jeopardise key sites ability to deliver against other strategic priorities of the Plan (for example, the delivery of specialised commercial uses in the Knowledge Quarter). It is understood that larger sites have an important role in contributing to the borough's housing needs, but there is concern that applying a blanket requirement for 50% of all uplift in floorspace could affect sites deliverability and impact the economic objectives of South Camden.
8. Given the Site's location being within a significant growth area for research and development, and its role in supporting the Knowledge Quarter as a major innovation district, the importance of acknowledging the Site's potential for economic growth and the clustering of this key sector should not be overlooked.
9. In order to protect the economic objectives of South Camden specifically, in the context of Policy H2, locational requirements should be reinstated to the Central London Area/CAZ and identified town centres. The appropriate balance of uses on sites that are outside of these current areas should be identified proactively through site allocations or through the planning application process.

Matter 10, Question 1 parts F, G and R:

10. This section of the Hearing Statement focusses on the following aspects of Question 1, parts F, G and R for Matter 10:

For each proposed development site, please set out:

f. For employment proposals, the estimated floorspace and whether it is justified;

g. For any mixed-use proposals, the anticipated housing capacity and estimated floorspace of non-residential uses and whether it is justified; and

r. Clear evidence of whether the site is viable and developable at the scale of development expected within the plan period.

Part F

11. Site Allocation S7 states that new proposals for the Site should intensify employment uses to ensure no net loss of employment floorspace. Reef agrees with this wording and the flexibility within it to allow a design-led process to determine the appropriate quantum of employment use, given that the Site is uniquely positioned to provide a significant contribution to the



growth of the Knowledge Quarter through the delivery of high quality, purpose built research and innovation led floorspace.

12. The Site sits at the heart of the Knowledge Quarter and is capable of making a nationally significant contribution to the provision of high quality, purpose built laboratory and research space. This form of employment floorspace is recognised across national, regional and local policy as a critical growth sector, with the Government's consultation on the revised NPPF and the London Growth Plan both emphasising the importance of scaling up laboratory capacity within world leading clusters. It should be noted that Reef do not control the entirety of the area within the site allocation, with the part of the site referred to as the ATS Tyres site in separate ownership.

Part G

13. Reef supports the principle of a mixed-use allocation, however, the evidence base does not clearly explain how the indicative housing capacity has been derived, and figure is to 280 homes in the current draft. The Site is expected to deliver both intensified employment floorspace and new housing. Therefore, striking the appropriate balance between these uses will be essential to achieving a successful, deliverable scheme.
14. Reef considers that the quantum of both residential and non-residential floorspace should be determined through a design-led process rather than through prescriptive figures in the allocation. Key design considerations—including public realm distribution, new routes and connections, townscape impacts, and the relationship between residential and employment uses—will influence the appropriate capacity of housing. While the housing figure is acknowledged to be indicative, the allocation should recognise that final capacity must be established through detailed design and discussions with the Council which seek to balance all of the priorities within the Plan, particularly given the absence of spatially defined employment growth targets within the Plan. Therefore, the housing figure target should be removed or reduced.

Part R

15. The Site is capable of delivering a comprehensive mixed-use redevelopment within the plan period, but the allocation must provide sufficient flexibility to balance employment and residential priorities to enable its delivery.
16. The Site's location, within a major growth cluster for research and development and life sciences, provides strong market justification for significant investment in employment floorspace. This, combined with the Site's scale and accessibility, supports its developability. However, prescriptive requirements, particularly in relation to housing quantum, could constrain the ability to deliver the high quality research and development floorspace in the Knowledge Quarter that national and regional policy identifies as essential to economic growth.
17. Reef therefore considers the Site to be deliverable provided that the allocation allows for a design-led approach to determining quantum and massing, and that policy requirements are



applied flexibly and in the round. The draft allocation's recognition that the Site may be appropriate for tall buildings is welcomed, though heights should not be treated as an absolute cap, as additional height may be justified through detailed townscape and design analysis.

Conclusion

18. While Reef is broadly supportive of the strategic direction of the draft New Local Plan and the aspirations for Site Allocation S7, modifications are required to ensure that the Plan is justified, effective and consistent with national and regional policy.

Modifications sought to Policy H2

19. Reef requests that Policy H2 be amended to ensure it is justified, effective and consistent with national and regional policy. Specifically, Reef seeks the following changes:
 - a. Refinement of the policy's locational scope, reinstating its application solely to the Central London Area/CAZ and designated town centres. The expansion of the policy to the wider South Camden sub-area is not supported by proportionate evidence and is considered unjustified.
20. These modifications are necessary to ensure that Policy H2 does not inadvertently impede the delivery of high value employment floorspace within the Knowledge Quarter and wider South Camden growth area.

Modifications Sought to Site Allocation S7 (24–86 Royal College Street)

21. Reef supports the principle of a mixed-use allocation for Site S7 but considers that modifications are required to ensure the allocation is sound. Reef therefore seeks the following changes:
 - a. Removal of the indicative housing capacity figure, which is 280 homes in the current draft. The final quantum of housing should be determined through detailed design analysis rather than fixed numerical expectations.
 - b. Explicit recognition that the balance between residential and employment floorspace must be established through a design-led process, taking into account public realm, connectivity, townscape, site layout, and the functional relationship between uses. Prescriptive floorspace figures risk constraining the delivery of high quality research and innovation space.
 - c. Retention of flexibility regarding building heights, ensuring that the reference to tall buildings is not interpreted as an absolute cap. Additional height may be justified through detailed townscape, design and visual impact assessment.



22. These modifications will ensure that Site Allocation S7 remains viable, developable and capable of delivering a nationally significant cluster of research and innovation floorspace alongside new housing.

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