

## Kentish Town Neighbourhood Forum

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29<sup>th</sup> January 2021

### **Murphy's Yard Planning Application no. 2021/3225/P**

Dear Mr McClue,

Thank you for your email dated 5<sup>th</sup> January, informing us that Outline Planning Application for Murphy's Yard, has been registered with Camden Council. In our formal capacity as consultees, we are now submitting the Kentish Town Neighbourhood Forum's, (KTNF), response to the application submitted for Murphy's Yard by Folgate Estates Ltd, application no. 2021/3225/P.

As you know from our 'Kentish Town Neighbourhood Plan', and the work we have done with you and your colleagues, during your planning department's preparation of the 'Kentish Town Planning Framework' document, we want to see the Murphy site redeveloped to become an exciting comprehensive mixed development incorporating, new housing, of which 35% is affordable, new office and industrial workspace, some leisure and community facilities, and generously landscaped public space providing a traffic-free route between Kentish Town and Hampstead Heath. The scheme proposed in this application attempts to achieve these objectives, but does not yet illustrate an adequate application for KTNF to support. There are a number of important matters we would like to see resolved before final consent is granted, and we set these out below.

We recognise that this particular application is for outline consent and that some of our concerns may only be resolved when detailed design is submitted seeking Reserved Matter Approval, (RMA), but we have attempted here to list all our principal concerns now, so that you are aware of them, and you can give consideration to which require attention under this submission, and which will remain of concern under the RMA process.

## **1. Camden's Design Review Panel Meeting 23/7/2021**

KTNF were shocked to read the minutes of this meeting which took place after the planning application was deposited. The minutes, which run to 12 pages in length, set out a long list of constructive criticisms that require further design consideration, and the KTNF is at pains to understand how the application in its current form can be consented while so many important matters remain unresolved. On many of these matters we concur with the comments made by the Design Review Panel, (DRP). We have made many similar comments to Murphy by letter during the consultation process, and also in correspondence to your planning department at Camden Council. The list of proposed changes made by the DRP is extensive, and KTNF consider that there are so many issues still to be resolved that consideration should be given to the application being withdrawn at this time, and resubmitted after further design work is done.

## **2. Tower Heights.**

Whilst many concerns have been expressed about the effect of 17–19 storey towers on the site, we appreciate that to achieve the amount of housing in the brief demanded by the London Borough of Camden, and the GLA, tall buildings are required. We are not unduly concerned about the concept of towers as these towers are set well back in the site, and away from the important views from Kentish Town Road and Gordon House Road. We are more concerned about the view of the site seen from Parliament Hill and Hampstead Heath, and we note the DRP comment that the tallest ones would be better if reduced by 2 storeys. We would like to see a study done to identify the effect on the number of housing units that would be provided if these storeys were cut down as suggested by the DRP. If the 750 housing units proposed could not be achieved when the tower heights are lowered then KTNF would like both the London Borough of Camden, and the GLA, to relax their insistence on such a demanding residential brief, so that the buildings are less tall and less bulky. Does the effect of an apparent change in the GLA's density policy change the need for such tall towers?

### **3. Massing of Buildings along the Railway.**

KTNF have expressed concern for some time over the proposed massing of buildings on plots FGH and I, which appear as a 'wall' of building when seen from Kentish Town. As in Paragraph 2, 'Tower Heights' above, we appreciate that to achieve the quantity of accommodation set by the brief, large buildings are required to meet the demands of the brief, and so again we question whether the demands set by the brief are too great to be achieved on this particular site?

### **4. The Car Wash Site. (369-377 Kentish Town Road)**

KTNF insist that no consent be given to this application unless, and until, there is a condition imposed that no construction on the application site can commence until the Car Wash site is built, and a clear route with a new ramp to be built alongside the railway lines, is also complete. The reason for this requirement by KTNF is because the Car Wash site, and the proposed ramp, illustrated in the 'Design and Access Statement', page 271, ( KTNF want the width of this ramp to be increased from 5m to 6m), provides the physical and visual entrance to the entire scheme proposed in this application, and consequently are essential to its success. Murphy informed KTNF, at a recent meeting, that they intend to build out the approved Car Wash site scheme before they commence any of the buildings on the current application site. KTNF require that Camden planners make it a condition that the completion of the Car Wash site, and the ramp suspended over the railway land, must be built before the current application site commences on site.

### **5. Links to Other Adjoining Sites.**

KTNF also require commitments to be given by the developer to ensure that an adequate arrival point for a bridge link from the Regis Road site is allowed for in any consent given for this application. A single drawing is included in the 'Design and Access Statement', page 272, to show where this link might occur.

However, it may be more appropriate, depending upon the layout of buildings on the Regis Road site, to bring the bridge across the railway between building plots I and H, for which some provision should be allowed. No width is shown for this bridge on Fig 569, but we suggest to accommodate pedestrians and cyclists this should be 6m wide.

## **Cycle Routes.**

Whilst we are generally in agreement with the design concerns expressed by the DRP in respect of the cycle routes through the site, we are more concerned that too high a priority is being shown to cyclists, and not enough is shown to pedestrians walking through the site. KTNF is concerned that cyclists often present significant danger to pedestrians, particularly those pedestrians that are young, old, or disabled, and we are concerned that insufficient attention has been given to the protection and safety of these groups. We are also concerned about the increase in use of electric scooters, and electric bikes, which when occupying cycle routes, can present danger to pedestrians. We strongly recommend that further work is required to increase the widths of all pedestrian routes to a minimum of 3 metres to enable a pair of people walking in one direction to avoid another pair of people walking in the opposite direction from having to step aside. We also consider it essential to provide adequate separation of cyclists travelling in one direction to be clearly separated from cyclists travelling in the opposite direction, and we consider that cyclists must be physically prevented, from encroaching on pedestrian routes. (similar to that achieved between Agar Grove and Camley Street).

## **6. Community Facilities.**

KTNF are dissatisfied with the non-specific reference to community uses being incorporated within the Healthcare building, and elsewhere on the site. We need a clear commitment on what community uses are to be provided for residents and visitors both within the Healthcare building, and elsewhere within the development. Specific space allocations and locations are needed for different age groups, such as play space for infants, leisure and sporting activities for adolescents, flexible use arts and community space for adults, and facilities for the elderly.

## **7. The Health Care Building.**

We are concerned that there is no clear description within the application that sets out what the Health Care building is to be used for, and what purpose it is designed to serve. At one time it was suggested it might be a convalescent facility for patients leaving hospital, but not yet fit enough to go home. We also understand it may be intended for medical research. It might be used for minor injuries, a doctors' surgery, nurses' accommodation, or for other uses. It

is a large building and we would like its use to be explained, so as to be assured of its suitability in its setting. Have Camden planners established whether the large number of new residents being introduced on the development site will require a new doctor's surgery to be provided?

## **8. Greening and Landscape.**

We support the DRP's proposals for improving the opportunity for the provision of green roofs. Whilst greenery is illustrated on roofs on the aerial CGI, there is no commitment to the provision of green roofs in the application parameter drawings or design codes. KTNF stress the requirement to see the buildings on the site incorporate as much green finish on the buildings as possible. Green Roofs will also soften the impact of the built development seen from the higher ground of Parliament Hill and Hampstead Heath, and could be used as gardens for office and other workers. KTNF support the DRP's comments on the need to lock into this outline application the requirements for green planting; we feel not enough trees are shown on the drawings, and that there is insufficient green landscape generally in the scheme, which has given too much public space to areas of paving. Due to the site being the route for entrance to Parliament Hill and Hampstead Heath, we want more greenery incorporated along the 'Heath Line' route.

## **9. Housing Quantity to be Fixed.**

The KTNF are very concerned that we have always understood that the brief set by Camden and the GLA was for 750 residential units, but now this application is seeking consent to permit this figure to be raised to 825 units. We are already concerned, see paragraphs 2 and 3 above, that the amount of accommodation is too dense for the site, and that the problems of height and massing thrown up by the proposed scheme illustrate its overdevelopment. We fear that any consent to enlarge the residential accommodation beyond 750 units will either force the buildings to become bigger, or for the units to be made smaller; we consider neither of these solutions are acceptable. KTNF want 750 residential units to be the maximum permissible on the application site.

## **10. Shed 3 and Plot I.**

We are concerned about the apparent lack of space between shed 3 and the neighbouring building occupying Plot I. We recognise that both buildings are bulky because of the need for extensive internal floor areas, but the distance between them seems too tight to for either building to achieve adequate daylight or external views. We question whether the roof form on Shed 3 is appropriate, and indeed whether the roof is necessary. We suggest it could be either entirely, or partially, removed to provide an external roof garden instead.

### **11. Impact on surrounding Services.**

Whilst we recognise that the location of the site is advantaged by having access to two overground railway stations, an underground station, and several bus services, KTNF are concerned to establish whether sufficient attention has been paid to the impact, on existing local services, of the large increase in numbers, of both residential occupants on the site, and those employed and working on the site. All will add considerable load on the local road and rail network. We are also concerned about the quantity of delivery vehicles that will be delivering goods to those on the site when the buildings are occupied. We would like to see a more detailed study to assess the impact of the population increase on the surrounding transport network, to confirm that it can cope, or whether additional services may be required.

### **12. Security and Management control.**

We note that reference is made to the incorporation of a management control centre which will monitor CCTV throughout the site. However, it is not clear as to whether all of the site is to be adopted by the local authority, or if the entire development area, including the public route from Kentish Town to Parliament Hill, (the 'Heath Line'), is to remain in private ownership. KTNF would prefer that the main public route from Kentish Town to Parliament Hill is adopted, but if it is to be privately owned we need more information on how maintenance, cleaning, and security are to be managed and controlled, and how continuing maintenance of these services are to be paid for.

### **13. Lessons from Grenfell Tower.**

Whilst the final results of the Grenfell enquiry are awaited, the KTNF are concerned that lessons that can be learned from the Grenfell tragedy are

applied to the design and building of the tower blocks, which are due to be constructed in a later phase during a decade of building.

#### **14. Phasing.**

We note the suggestion made in the DRP report for the construction work associated with the existing shed buildings, (Sheds 2 and 3), to be in the first phase of building work. KTNF see no need for this change to the building phases proposed by the applicant, which sets out that building phases progress from Kentish Town Road towards Gordon House Road.

#### **15. Maintaining a Temporary Route During Construction.**

We have repeatedly requested that the consent be conditioned on the basis that a temporary pedestrian and cycle route is maintained across the site, from Kentish Town Road to Gordon House Road, throughout the entire construction period. The purpose of this is to establish the connection for pedestrians and cyclists at the outset of the construction and enable its use before the final phase is complete, which would otherwise delay its provision for many years. The route will also provide an opportunity for the general public to enjoy observation of the construction progress on site during the various building phases. (similar to the temporary route provided during the Kings Cross redevelopment).

#### **17. CIL Benefits.**

Reference is made in the application for the provision of CIL money to be used to pay for the costs of building the entrance ramp from Kentish Town Road into the development. Whilst we consider the ramp to be absolutely essential, we do not consider that the planning consent should include such a provision. The application of CIL money is a matter of agreement between the developer and the London Borough of Camden based upon an agreed financial viability assessment, and should not, in our opinion, be linked to the planning application, or its consent. We are also concerned that CIL money is set aside where applicable to assist if needed for the provision of the Bridge link to the Regis Road site, for the formation of the Kentish Town Square, and for lifts and other improvements to the overground station at Kentish Town, all as described in the Kentish Town Neighbourhood Plan.

## **18. Affordable Housing.**

KTNF are concerned that despite schedules being included within the Design and Access statement the outline application appears to have no commitment to the provision of a specific breakdown of types of affordable housing accommodation. We consider this commitment essential within the outline consent to avoid the possibility of reduction as the scheme develops on site.

## **19. Delivery Partner.**

The DRP suggests under their heading 'Routes and Connections' that a 'delivery partner' is required to ensure all links to the site can be provided. We have been unable to understand what is meant by this and would welcome an explanation from Camden, or the DRP.

## **20. The Viewing Corridor.**

It is a disappointment to KTNF that the view of Hampstead Heath, as seen from outside Kentish Town station, as required in our Neighbourhood Plan, has not been realised, but understand that the amount of accommodation set by the brief conflicts with the viewing corridor. The narrow view now illustrated in the CGIs accompanying this application can only be glimpsed over the extended roof of Shed 2, and we would like to see the design of this roof redesigned to reduce its height and reveal more of Hampstead Heath beyond. We also recommend that the northern end of the roof of Shed 3 be redesigned to reduce its height, or, as suggested in item 11, 'Shed 3', above, this roof is removed in its entirety, so as to provide a better view of Hampstead Heath. We reiterate our desire, as expressed in item 9, 'Greening and Landscape', above, that more trees, roof gardens, and green walls are incorporated in the detailed design of buildings as they become submitted for Reserved Matter Application, to help compensate in part for the loss of the viewing corridor.

## **21. Sustainability.**

KTNF concur with the comments made by the DRP that the Sustainability report, (by Hoare Lee), is too general in setting out objectives but not specifying sufficient detail. Questions remain over how materials from existing

buildings are to be reused, how materials are to be sourced, how carbon assessment is to be applied, and how existing facades are to be retained.

## **22. Parameter Plans.**

The parameter plans are deeply disturbing as they indicate both height and massing of buildings can be enlarged to the maximum extent, (see the red lines), to the point where the scheme would not bear any truthful relationship to the illustrative images, as illustrated in the CGIs, and the scheme which we have been discussing with the design team, and which has been exhibited during the consultation process over the last two or three years. It is entirely unacceptable to KTNF to agree to the enlarged 'maximum' parameter drawings; we are only prepared to commit to the 'black line' massing and we need to establish that all lift motor rooms, mechanical and electrical plant, and other rooftop projections are contained within the 'black line' boundary, otherwise there is no proper control on building heights and building massing.

## **23. Construction Traffic on Surrounding Roads.**

KTNF are concerned that the main roads bordering the site, Kentish Town Road, Highgate Road, and Gordon House Road, which are already heavily used by traffic, particularly during rush hours and school entry and exit times are not overwhelmed by the addition of construction traffic. Can we be given further assurance this matter has been properly considered? Has any consideration been given to the use of the adjoining railway tracks for the delivery and removal of some of the construction materials?

## **24. Consultation and Design Reviews for RMAs.**

As formal consultees, KTNF confirm their requirement for continuing dialogue with the design team, and with Camden Council, to ensure that the objectives consented in the outline application are included in the subsequent Reserved Matters Applications, (RMAs), and consents.

## **Conclusion**

The matters we have listed above are ones which we consider are important to incorporate in the development proposals before planning consent is granted. All these are matters that will improve the quality of the comprehensive development of this important site. However, we understand that this is an outline application, and as many of the matters we have raised will be dealt with under Reserved Matters Applications, (RAMs), when the individual buildings develop at detail design stage. When the matters we have listed above are dealt with and resolved, then we will support the application, as then the proposed application will reflect the main aims, and the vision we set out in our Neighbourhood Plan, which were later confirmed in the London Borough of Camden's 'Kentish Town Planning Framework' document. In its current form, KTNF object to this application being granted consent.

Please would you confirm your receipt of this letter and that it is accepted as KTNF's formal response to the outline application no 2021/3225/P.

Yours sincerely,

Henry Herzberg RIBA

Chair of the KTNF Murphy's Yard Working Group

And signed on behalf of the Kentish Town Neighbourhood Forum

Copy: Bethany Cullen, London Borough of Camden