DARTMOUTH PARK NEIGHBOURHOOD FORUM

OBJECTION TO APPLICATION 2021/3225/P - MURPHY'S YARD REDEVELOPMENT

FEBRUARY 2022

Introduction

Dartmouth Park Neighbourhood Forum (DPNF) recognises the outstanding opportunity for the site, most of which is in our Neighbourhood Area, to host an exemplar development that adds to the wider area, rather than detracting from it.

It is hugely disappointing that this opportunity has been so badly squandered and the flaws are so fundamental that there is an irrefutable policy argument for this application to be refused.

Many of the problems stem from a level of unjustified over-development. As recognised by the Camden Design Review Panel, this leads to design outcomes that have unacceptable impacts on, amongst other things:

- housing mix and affordability
- townscape and views
- quality of life
- climate emergency

Refusal would present Murphy with a chance to regroup, return to the drawing board and work with the community, Camden Council and other concerned stakeholders on a new proposal that we can all get behind.

We suggest that the most sensible course of action would be for the application to be withdrawn so that work can progress on working together in a way that has so far been lacking.

About this Objection

We note that a very large number of Camden residents and both local and national organisations have already submitted comments on (mainly Objections to) to the application. Many of these contain material reasons for refusal. We do not attempt to repeat these here. Instead, we focus on a number of policy areas, from the Neighbourhood Area to national level.

Whilst we acknowledge that the Design Code is one of the documents sought for approval, we have chosen not to provide comments on it. This is because of the fundamental problems that exist within the other two documents sought for approval – Parameter Plans and Development Specification – that need to be fixed before the Design Code is finalised; Camden Council will not be able to approve a Design Code which is for a scheme that does not meet basic policy requirements.

After an introduction to the Dartmouth Park Neighbourhood Plan, this Objections highlights six fundamental issues with the application. It then references a number of other areas of concern. Any single one of the fundamental issues and some of the other areas of concern are valid grounds for refusal. Put together, the case for refusal is watertight.

The fundamental issues that we focus on are:

- 1. Amount of development
- 2. Housing mix
- 3. Affordable housing
- 4. Design
- 5. Views
- 6. Engagement

Dartmouth Park Neighbourhood Plan

The Dartmouth Park Neighbourhood Plan (DPNP) was 'made' (adopted by Camden Council as part of the Local Plan) in March 2020. The process of producing the Plan started in 2012 and included an unusually high degree of community engagement; the Independent Examiner concluded that "the process has been appropriately thorough, and I consider that the opportunity has been available for all interested parties to contribute to the content of the DPNP" and "it is clear that there has been significant community involvement in the preparation of the DPNP. I was particularly heartened to see that a 'community walkabout' was arranged early on in the process, that local schools have been encouraged to participate and that a wide range of opportunities to engage the community have been taken" (see Examiner's Report at https://www.camden.gov.uk/dartmouth-park-neighbourhood-forum). We were heartened to read this independent expert agreeing that the DPNP is the community's plan.

The DPNP includes a section on Murphy's Yard, which is one of the Specific Neighbourhood Sites in Chapter 9. For the Specific Neighbourhood Sites, the DPNP sets out i. expectations on community engagement, including producing a Development Brief jointly with the community prior to submitting a planning application, and ii. site-specific development principles. Whilst these are not policy (because they are about process), they are aspirations and the Examiner agreed that "the DPNF is justified in seeking to set out its aspirations in a positive and unambiguous way". The development principles were endorsed by the Examiner with the comment that "with regard to Murphy's Yard I asked the DPNF for additional justification for its approach towards the future of the site and I am satisfied that the response, dated 11 June 2019, clearly sets out the reasoning behind the community aspirations for this area of land."

We review the how the application performs against the DPNF policies, alongside other policies, under various themes below. Alongside the DPNP, the key policy documents are the Kentish Town Neighbourhood Plan (KTNP), the Kentish Town Planning Framework (KTPF) and the Local Plan – collectively the statutory Development Plan.

Fundamental issue 1: Amount of development

Many of the widely identified failings of the application stem from the fact that simply too much development is being squeezed into a relatively small site. We will return to these failings below, but first it is crucial to establish that there is no policy justification for the specific amount of development being applied for.

The **KTPF** acts as the Planning or Development Brief for the site and is the only source of unit/floorspace requirements by use. It specifies these to be:

- 1. **Housing**. Page 63 says "it is anticipated that the Murphy site could deliver **in the region of 750 homes**, although this will be dependent on a number of factors".
- 2. **Employment**. Page 63 of the KTPF also says that the site will "retain the existing quantum of industrial floorspace (B1c, B2, B8 and sui generis of a similar nature), but re-provided in a more efficient and sustainable format that allows for intensification and co-location of industrial and other uses".
- 3. Other uses. The KTPF anticipates cultural uses around the historic railway sheds.

According to the planning application, all of the buildings currently on site have a GEA of **19,373 sqm**. So the policy for the site is for around 750 homes and around 20,000 sqm of employment floorspace. The application is for up to 825 homes and up to 95,000 sqm of non-residential (mainly employment) uses.

We understand from discussions with the applicants that the source of the employment floorspace is a policy from the draft London Plan relating to 65% plot ratio. The policy was withdrawn from the London Plan before adoption after an instruction from the Secretary of State and agreed by the Mayor of London. **Nothing relating to the 65% plot ratio has any relevance to this planning application**, despite incorrect and misleading references to London Plan policy H5 and the Fast Track Route in section 6.4 of the Applicant's Planning and Regeneration Statement.

We note that "no overall net loss, of industrial, storage and warehousing" – not increasing it by five times as well as 825 homes – is also the position taken in Camden's emerging Site Allocations Local Plan.

The **National Planning Policy Framework** (NPPF) states that planning decisions should support development that makes efficient use of land, taking into account factors including: the identified need for different types of housing and other forms of development (see fundamental issue 2 below); the desirability of maintaining an area's prevailing character and setting (including residential gardens), or of promoting regeneration and change (see fundamental issue 4); and the importance of securing well-designed, attractive and healthy places (see fundamental issue 4). Against these measures, the proposed density is too high.

Our view is that the development quanta in the KTPF should be the basis for a reworking of the scheme. Something along the lines of 750 homes and 20,000 sqm of other uses could be achievable without the fundamental issues explored below that are, in part, driven by a development specification that has no basis in policy and is not justified.

Fundamental issue 2: Housing mix

Driven by over-development and net housing densities of around 600 dwellings per hectare, the application is unable to provide anything like the housing mix that policy requires. Instead, we are offered a **mix that does not meet identified need**.

Local Plan policy H7 says that "we will seek to ensure that all housing development, including conversion of existing homes and non-residential properties:

a. contributes to meeting the priorities set out in the Dwelling Size Priorities Table; and

b. includes a mix of large and small homes." [large is defined as 3-bedrooms and above]

The Dwelling Size Priorities Table is reproduced here:

Table 1: Dwelling Size Priorities

	1-bedroom (or studio)	2-bedroom	3-bedroom	4-bedroom (or more)
Social-affordable rented	lower	high	high	medium
Intermediate affordable	high	medium	lower	lower
Market	lower	high	high	lower

88% of the proposed 825 homes will be 1-bed and 2-bed flats. As a proportion, this is **twice as many** as Camden's own Strategic Housing Market Assessment (SHMA) says is needed throughout the Borough. Just 14 of the 825 homes will be family (4-bed) houses. The table below compares the proposed mix with the Camden SHMA, which provides the evidence base for policy H7.

Need (SHMA) v proposed, all homes

	1 bed	2 bed	3 bed	4+ bed
Need in LB Camden SHMA	8%	37.5%	37.5%	16%
Proposed development	38%	50%	10%	1.5%
Over (+)/under (-) supply	+30%	+12.5%	-27.5%	-14.5

If large sites like Murphy's Yard do not attempt to meet the desperate need for family housing (note that Carlton School right next door has recently closed because of lack of pupils), what hope is there on any other sites? It is impossible to argue that this mix is in any way policy compliant, and to accept it would be a clear signal that Camden has given up on providing housing for families.

DPNF policy H1 on meeting housing need is also relevant, requiring a wide mix of housing types.

Fundamental issue 3: Affordable housing

The main advantage of developing Murphy's Yard is the opportunity to provide affordable housing. Based on the planning application, we are not at all reassured that a meaningful, or policy compliant, amount of affordable housing will be provided.

DPNP policy H2 requires developments to maximise the inclusion of affordable housing.

Local Plan policy H4 includes a 50% target for affordable homes on developments with a capacity for 25 homes or more. The application aims for just 35%. An attempt in the Planning and Regeneration Statement to justify 35% on the basis of policy H5 of the London Plan, which applies to situations that are not evident here, is wholly unconvincing and should be entirely ignored. A tortuous attempt in the Planning and Regeneration Statement to justify a lower than 50% provision on the grounds that some of the site is or was owned by Network Rail is also entirely irrelevant unless, as per London Plan paragraph 4.4.7, it can be demonstrated that Network Rail is providing 50% affordable housing across its portfolio of sites (which would mean some sites providing more than 50% affordable to make up for the shortfall at Murphy's Yard), which it is not.

The above illustrates that **there** is no policy case for provision of affordable housing at less than **50%**, so, to reduce the provision, we would expect the developer to resort to the games on viability that LB Camden is trying hard to resist elsewhere.

The application's Financial Viability Appraisal claims that, even in an area with some of the most expensive housing in the country and with the land already owned by the developer, the scheme is not viable with even 35% affordable housing. Unfortunately, the Financial Viability Appraisal does not attempt to test what level of affordable housing would be judged to be viable.

It is highly concerning for Camden and its residents that, having declared that 35% is not viable, the Planning and Regeneration Statement (para 6.4.27) says that "the Applicant's ability to provide 35% affordable housing is subject to ongoing discussions and agreement with LBC relating to the allocation of Community Infrastructure Levy funds and other matters". This appears to suggest that CIL can be negotiated down or away. This is one of several misleading assertions in the application as CIL is non-negotiable. This means that it is the affordable housing that is most likely to be attempted to be negotiated down.

It can be deduced from the Financial Viability Appraisal that the model is run on an assumption that a 2-bedroom flat in the towers would cost just below £1million. This does not appear to be an unreasonable assumption but puts the private stock out of reach of the vast majority of the population.

Which all begs the question: who really benefits from this development?

Fundamental issue 4: Design

The standards of design proposed objectively fall well below the standards that are required. Whilst we cannot comment on the detailed design of buildings or spaces as this will be subject to subsequent planning applications, many of the well-understood and -documented basics of good design are nowhere near to being met in the matters that are the subject of this application.

DPNP policy DC3 sets out a requirement for good design, requiring that all developments demonstrate good quality design, responding to and integrating with local surroundings and landscape context. The policy clarifies that in the Neighbourhood Area (that includes most of the site), good design means achieving high quality design that respects the scale, mass, density and character of existing and surrounding buildings and preserves the open and green character of the area. Despite claims in the planning application that the scheme sensitively responds to its wider context, it offers no convincing justification and is wholly unable to demonstrate how it respects the scale, mass, density and character of existing and surrounding buildings and preserves the open and green character of the area as required by the policy.

Local Plan policy D1 on design states that the Council will require that development a. respects local context and character and b. preserves or enhances the historic environment and heritage assets. In this latter respect, we note that the site is adjacent or very close to five Conservation Areas, including, in our Neighbourhood Area, the Dartmouth Park Conservation Area. The DP Conservation Area includes Lissenden Gardens, which the wireframe images in the Townscape and Visual Impact Assessment (TVIA) show will be significantly impacted by the development (see, for example, View 1). We return to the validity of the conclusions drawn by the TVIA below.

Regarding design and character, the **KTPF** requires that the development must be "seamlessly integrated with surrounding neighbourhoods". It stipulates that it will build up to a general height of eight storeys with some buildings going above this in appropriate locations. It clarifies that buildings above eight storeys will be considered tall buildings and will be subject to the additional considerations in Policy D1 of the Local Plan. It says that any taller buildings will need to create a human scale at street level and be elegant in longer views. None of these requirements are met by the proposals here.

The **National Design Guide** (NDG) has been published since (we understand) design work started on the Murphy's Yard proposals, although its influence is imperceptible. The NDG is structured around ten characteristics of good design. The first of these is **context**, responding to which is a fundamental cornerstone of successful places. It notes that well-designed places are: based on a sound understanding of the features of the site and the surrounding context; integrated into their surroundings so they relate well to them; influenced by and influence their context positively; and responsive to local history, culture and heritage.

Other characteristics in the NDG include **identity** ("Well-designed new development is influenced by an appreciation and understanding of vernacular, local or regional character, including existing built form, landscape and local architectural precedents"), **built form** ("Well-designed places use the right mix of building types, forms and scale of buildings and public spaces for the context") and **nature** ("Well-designed places integrate existing, and incorporate new natural features into a multifunctional network that supports quality of place, biodiversity and water management, and addresses climate change mitigation and resilience, and prioritise nature").

Regarding tall and bulky buildings, which together are the defining characteristic of the Murphy's Yard proposals as defined in the Parameter Plans, the NDG notes that "proposals for tall buildings (and other buildings with a significantly larger scale or bulk than their surroundings) require special consideration. This includes their location and siting; relationship to context; impact on local character, views and sight lines; composition - how they meet the ground and the sky; and environmental impacts, such as sunlight, daylight, overshadowing and wind. These need to be resolved satisfactorily in relation to the context and local character").

The NDG is an expression of the basic components of quality, liveable and popular places that are well understood within the urban design community. In too many ways, the approach taken at Murphy's Yard is the opposite of this: with its extremely bulky industrial buildings and tall residential buildings, with its reliance on city centre-type set piece public spaces and with its rejection of the 'grain' and typologies that characterise the wonderful surrounding neighbourhoods, the proposals would represent a design philosophy that has nothing to do with established good practice and local context and everything to do with cramming as much development in as possible.

The planning application includes extensive analysis of local conditions that does demonstrate some understanding of context and the area's special qualities, but this effort has been wasted as it is impossible to see how this analysis has actually informed the proposed design. This is shown in the very narrow range of options explored in the Design Evolution section of the Design and Access Statement (DAS), suggesting a preconceived architectural approach.

We very much share the views of the Camden Design Review Panel, September 2020, which reported "as noted in the previous review, the bulk, height and massing of residential blocks is excessive and...have a significant and unacceptable impact on important views from Parliament Hill to the north. The amount of accommodation should be reduced or redistributed, potentially through reduction of other uses on the site." The DAS shows that the scheme reviewed in September 2020 is essentially the same scheme that has been submitted, although the tallest tower has actually grown in height since – not a response that suggests lessons were learned. This should have been grasped as an opportunity to revisit first principles of the design, rather than to ignore the experts' advice.

A Design Review Panel with a different make up was used for the July 2021 session (after the planning application was submitted). The panel member whose company produced the NDG was absent as was the previous chair, replaced as chair by an employee of the Old Oak and Park Royal Development Corporation, where very tall buildings are proposed. This Panel was asked for advice on: "heights and massing; views and townscape impact from surrounding areas, including those with and without neighbourhood plans; future-proofing through delivering a zero carbon neighbourhood; ensuring a liveable place for residents; and on how the parameter plans and design code can provide a clear understanding of what will be built." It is a shame that the Panel report is silent on views, townscape impacts and ensuring a liveable place. It did, though, conclude that "the three central towers...appear too high in views from Parliament Hill and should be lowered, and also considers Plots F, G, H and I to be excessively bulky. It is concerned that the Design Code includes maximum parameter volumes that permit even higher development of this and other blocks, and alterations to massing, which would not be acceptable. It also feels it is essential that maximum parameter volumes do not permit building volumes to be filled out, creating excessive massing...The panel presses the team to increase sustainability ambitions." We agree with all of this.

The **National Planning Policy Framework** (NPPF) is very clear that "development that is not well designed should be refused, especially where it fails to reflect local design policies and government guidance on design" (para 134). Design is one of several reasons why this application should be refused.

As a result of the Government's strengthening of design policy, and the new London Plan's more cautious approach to tall buildings, schemes like Murphy's Yard are commonly being refused. For example:

- The Secretary of State for Housing has thrown out a very similar scheme at <u>Anglia Square</u>, <u>Norwich</u>, on heritage and character grounds;
- The Secretary of State has backed the Planning Inspector's refusal of a development of towers at the <u>old London Fire Brigade HQ</u> in Lambeth on grounds including design, heritage impact and overshadowing.
- The Mayor of London is turning down schemes that he thinks are over-development, such as Stag Brewery in Wandsworth (which is much less dense than Murphy's Yard proposals); and
- The Planning Inspector has backed Barnet Council's <u>refusal of redevelopment of Homebase in</u>
 <u>North Finchley</u> because of out of scale design (half as high as Murphy's Yard proposals and in a far less sensitive site).

In line with all of the design policies noted above, before offering our support, we will need to see a scheme that is based on building massing and layout that i. responds to the local context, and ii. creates a liveable, human-scale place for a mixed population to thrive in. Camden is renowned for low-rise, high-density development and, along with other local organisations and design experts, we believe that this should be the starting point for a re-think, alongside a more realistic assessment of site capacity.

Fundamental issue 5: Views

One of the main impacts of the over-development of the site and the way that it has been designed with almost no perceptible appreciation of context is on views. The visual impact on views from and of Hampstead Heath, on the surrounding Conservation Areas and residential neighbourhoods, and on amenities such as Kentish Town City Farm are quickly dismissed in a set of documents that do not appear to give an accurate or balanced assessment.

The relevant policies include those mentioned under 'design' in the preceding section, in addition to those highlighted in Historic England's strong rejection of the application. Because Historic England has set out the argument on views from Hampstead Heath so clearly, we do not repeat them here. We wholly endorse Historic England's position. We would also note that it is not just the protected views from Parliament Hill that will be affected – the view of the City and beyond from around the bandstand – a view that anchors Parliament Hill as part of London - will be particularly ruined, with the new development suddenly *becoming* the view.

Neighbourhood Plan, with a clear policy about the viewing cone itself and a peripheral zone. At the time of the KTNP being made, it was cited by the Chair as being the Plan's most important and popular policy. The way that it has been treated by the design team is symptomatic of their general approach to the project. Early in the process they declared that the view was actually from the wrong place and decided to unilaterally impose their own view. And then they produced a scheme that almost entirely blocks their own view! This is clear from the wireframe images shown for view 12a (the protected KTNP view) and view 12b (presumably the alternative) in the applicant's TVIA. It doesn't matter if they respect the view or think they know better; what matters is that, after 1717 local people voted 'yes' in the KTNP referendum, the view is protected in policy.

The methodology of the TVIA has been correctly questioned by Historic England. The report itself does not claim to use the industry standard 'Guidelines for Landscape and Visual Impact Assessment', produced by the Landscape Institute with the Institute of Environmental Management and Assessment, preferring to be "based on the principles of" instead.

The TVIA comes to some very odd conclusions. The impact of the virtual blocking of the protected KTNP view is assessed as being "a change of moderate magnitude to a view of low-medium sensitivity. The significance is moderate (significant). The effect is beneficial". It is not credible that the TVIA also concludes that the effect of the development on several other views, including a number from Parliament Hill that have alarmed the public and statutory agencies (such as views 1, 25, 27, 28 (a protected London View Management Framework view)) to be beneficial. Other eyebrow-raising 'beneficial' assessments are given to the view of the grade II listed Christ Apostolic Church which is silhouetted against the sky (view 8) and the view from the City Farm (view 19).

The cavalier approach to views, including specifically protected ones, must be a fatal blow to the planning application.

Fundamental issue 6: Engagement

The **NPPF** asserts that "applicants should work closely with those affected by their proposals to evolve designs that take account of the views of the community. Applications that can demonstrate early, proactive and effective engagement with the community should be looked on more favourably than those that cannot" (para 132). It says that "neighbourhood planning groups can play an important role in identifying the special qualities of each area and explaining how this should be reflected in development, both through their own plans and by engaging in the production of design policy, guidance and codes by local planning authorities and developers" (para 127).

DPNF has had meetings with and attended presentations by the applicants over a few years, but we can categorically state that we do not feel that we have been engaged in a proactive and effective way. Despite our requests, there has not been a single co-design exercise. We feel that we have been making constructive suggestions throughout, on the understanding that a better scheme emerges with effective engagement but cannot tell that our volunteer time has had any influence on the proposed design outcomes, any more than the advice of the Design Review Panels did before submission. The approach can be characterised as 'consultation' at best, with no real attempt at participatory engagement.

Worried about the quality of development that was emerging and the answers that were being given in design team presentations, we wrote to Murphy in February 2021 with the following questions:

Character

- 1. There is a range of policy documents, from the NPPF ("Planning policies and decisions should ensure that developments... are sympathetic to local character and history, including the surrounding built environment and landscape setting") and National Design Guide through the Camden Local Plan and Kentish Town Planning Framework ("seamlessly integrated with surrounding neighbourhoods") to the Dartmouth Park Neighbourhood Plan that require design as being rooted in its context. David West said in the DM Forum presentation that the design is a "natural evolution of the surrounding neighbourhoods". Please can you explain how the wall of 7 towers of between 11 and 18 storeys has anything to do with the character of any of the surrounding neighbourhoods? This is a question about character and quality of place of the new development, not views of it or the impact on the 5 adjacent Conservation Areas, which will be a separate and important planning consideration.
- 2. To give us an idea of what the place will feel like, which successful neighbourhoods have inspired the design of the housing area? None of the CGI images showed any buildings higher than 6 or 7 storeys so it's hard to envisage from those.
- 4. Do the plans achieve the **appropriate grain** for a successful place? Somewhere that feels homely, with interwoven streets rather than big piazzas, and integrating with the streets (and nature reserve) around?
- 5. What would Neave Brown do with this fantastic opportunity?

Housing mix and zoning

- 6. What will the housing mix be and who are all the flats for? Don't we need more family housing we now have primary schools closing in Camden because housing policy and prices are forcing families out, including Carlton School immediately over the railway currently under consultation? We need stable, rooted communities, with a range of types and tenures. The lack of family housing is at odds with Robert Jenrick's demolition of the London Plan and does not comply with Local Plan policies H6 and H7 on housing mix, and the Camden SHMA which shows that housing need is for 31% 3-bed homes (for private; 29% across tenures).
- 7. Why such a hard **split between housing and employment zones**? Previous proposals integrated these elements much more throughout the site with residential units above the work units mixed use sites with studios for creatives. This all appears to have been lost in this proposal.

We did receive a polite response acknowledging the challenges posed by the questions, but never answers.

Our February 2021 email continued to offer some helpful advice about how to design a scheme that would be less likely to be rejected, including a number of exemplar examples of new high density development that is designed with people in mind.

We concluded with an offer:

"Nobody is fighting development here and we understand that a development needs to achieve certain densities. We worry the opportunity to create a place that responds to the area's special urban character, and that draws on a serious understanding of the lessons of what makes for a successful city neighbourhood, is being squandered. People are keen to help shape the Murphy's development through a creative exercise, and there are lots of skills to offer.

We appreciate that we have been consulted but it would be wonderful to be able to influence, to come together to engage in a creative, collective way. There is a wide pool of interested talent in the area. A meaningful programme of co-designing from first principles, based on a shared understanding of the parameters you need to achieve, could chart a new way forward."

This programme never happened. The result is a submitted planning application that has **united local people**, **shocked at what is being presented**, and which should be rejected.

Other issues:

There are a number of other important issues that also concern us but are being covered by other respondents. These include:

- **Climate emergency and resilience**: including the embodied carbon in tall buildings, overheating, single aspect flats, biodiversity
- Overshadowing of homes, spaces and community assets
- **Traffic and transport**: with local roads extremely busy and on-line shopping increasing, the conclusion that the development will result in less traffic than present use requires scrutiny

- **Construction traffic**: the over-development increases the amount of construction traffic to the tune of "approximately 1,500 construction HGV vehicles accessing the site per month", with worrying impacts on constrained streets such as Gordon House Road.

Concluding remarks

We are unsure how this scheme has progressed in this form to this stage.

According to local, regional and national policy, any single one of the six fundamental issues described above are grounds for refusal. Cumulatively, the case for refusal is overwhelming.

If the application is not withdrawn before determination, it should be refused.

We, and the wider community, remain willing to work with the applicant to produce a legacy for Murphy that we can all be proud of.

APPENDIX: COMMENTS POSTED ON OUR WEBSITE

Because the application runs to thousand of pages, many hard to read on a screen, we prepared a 4-page summary of the key points. This can be seen at https://dpnf.org.uk/index.php/murphys-yard-development/.

Below we present the 28 comments received from local residents at the time of writing. We have replaced names with initials but you can see the full names on the website. Please also take these individual comments into account.

1. LA

Views of Parliament Hill from Kentish Town should not be obstructed.
 There should be affordable housing provision for families as well as single people (which should include accessible housing for elderly with direct access to open space.)
 There should be provision for super-efficient transport links throughout the site.(also suitable for elderly)

2. **JL**

• The current proposals have too much dense development in the space allowed. There are too many single bed dwellings when more family dwellings are required. It is also not clear what facilities will be available for the elderly.

The 13-17 story and 19 storey buildings are too high, visually intrusive and inappropriate for this site.

They will block all views of Parliament Hill from Kentish Town. These views must be preserved.

Likewise, views of the city from Parliament Hill will be largely obscured.

This level of high rise development must NOT be allowed to happen.

It is a historical fact that high rise dwellings often create more social problems than they are intended to solve.

The developers and their designers are missing an real opportunity here to create well designed, lower rise dwellings surrounded by more pleasant garden space around the buildings in their drive to create more housing than the borough actually needs. There must be a re-think for a better design solution instead of this greedy plan.

3. **PS**

Completely agree with the above comments.
 Disappointing that the developers are rowing back on their original promises.

4. **PP**

• I completely agree with JL (comment above). The view from Parliament hill must be protected and there are not enough family homes being built.

5. **AF**

I can't believe that developers aren't following good environmental design practice. The
height of the proposed housing. Development will have a negative impact on light that
neighbouring buildings receive. This area also needs affordable housing for families.
Anyone who has tried to buy a family home here will tell you that. The development
seems extremely dense, an attempt to squeeze as much profit from the site as possible
rather than an attempt to add anything of cultural or civic value to the area.

6. **LH**

Daylight and sunlight to the Lido and Hampstead Heath should not be diminished.

7. **SA**

Parliament hill lido will have obstructed sun in the summer and an unpleasant atmosphere
of noise and cranes over the next 9 years. This will reduce the number of customers and
worsen the experience the swimmers that do come.

8. **FK**

• NO more big buildings – let us breathe

9. **AD**

• This Building is overpowering will cut out light and sunlight with a dark shadows to this beautiful spot. Overshadowing Gardens allotments and peoples homes why do they have to be so tall? I totally disagree.

Also how are any of our children ever going to get to buy property when these homes will be out of most peoples reach.

10. **MB**

• I object to the scale and height of this proposed development. The view from Parliament hill must absolutely be protected and there are not enough family homes being built.

11. AN

• The current proposals have too much dense development in the space allowed.

There are too many single bed dwellings when more family dwellings are required. It is also not clear what facilities will be available for the elderly.

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The developers and their designers are missing an real opportunity here to create well designed, lower rise dwellings surrounded by more pleasant garden space around the buildings in their drive to create more housing than the borough actually needs.

12. **DL**

• This is terrible. It doesn't meet the needs of the community. The worst part is the awful effect on the view from the heath and Parliament hill, which is one of my favourite places to go. One of the few breathing spaces in this incredibly crowded city, gone. Please think again before taking that away.

13. **NW**

• If Hampstead Heath is in any way impacted then I am wholeheartedly against this development.

14. **T**

• I object to the this proposed development. There are not enough family homes being built. The view from Parliament hill must absolutely be protected and the sunlight must be allowed to shine on the park and lido

15. **R**

• The view from Kentish Town to the Heath is hugely important. It needs to be better protected. The view from the Heath to the City and Canary Wharf is a major draw – despite the St Pauls view being partially obscured by the Shard. It's not clear why the height is needed. High density for single accommodation flats at such high costs is not meeting any locally driven community demand. Far better to have more social housing and extend the sense of community which is pretty strong in this area by having more family friendly accommodation – which also appears to be the greater need. I also think a proper traffic impact assessment is needed. The roads in the area are impassable at various points of the day and while this site has very good access to public transport inevitably servicing any number of new homes will increase the traffic flow. But was is a sustainable impact?

16. **KL**

I am against the development if it's going to affect the neighbourhood in a negatively.

17. **MM**

- This proposal is entirely the wrong scale for the area. A 'Kings Cross' corporate estate style
 development will destroy the unique character of our neighbourhood and seems unlikely
 to benefit the existing community, either through (affordable or appropriate) housing
 provision or increased employment opportunities.
 - The high-rise element of some of the proposed buildings is of particular concern. Erecting 19 story buildings in a dense corridor will not only obstruct protected views from both Parliament Hill and Kentish Town, it will fundamentally, irreversibly and detrimentally

effect the entire surrounding area. Increased traffic, particularly during the construction period is of huge concern given that there are congestion issues already due to the large number of schools in the immediate area. As it stands this proposal is entirely unacceptable, and I hope that the planning authority will recognise this.

18. **RK**

 I object to this development. It seems to be more about profit for Folgate estates over such a long time period and less about affordable housing for families and single people.
 To obscure the winter sun over the lido is tantamount to criminal damage. Reconsider please!

19. **KM**

• I 100% object to this development and how it will negatively impact the environment and the surrounding residential community areas. There seems to be know consciousness about considered planning, just about profit! Please do not allow this to go ahead.

20. **AS**

• I strongly object to this development on all of the grounds people have already outlined. I'm just filing an email response to Camden.

21. DR

• I agree that the current views should not be obstructed and, while it is true that more social housing is needed, 2-bed flats for £1m each will only benefit a tiny portion of the population. This really is an opportunity to think outside the box and produce something which works for everyone.

22. **R**

 The current proposals are very frightening considering Camden is a supposedly labour council

The tower blocks will be mainly small flats with available affordable housing not what's needed

The development will be far too dense changing the whole character of the area The council must be persuaded to reconsider

23. RD

As a resident in Mansfield Cons Area, concerned about the impact of this development on our shared environment and communities, I agree and support the views expressed. In addition, access by road and on foot to and from the egdes of the site needs to be considered fully at this Outline stage. We should not accept the developer's assertion that traffic generated will result in a net reduction(!) at rush hour peak times, which frankly is not credible. And how would the proposals deal with increased pedestrian access needed at Gospel Oak Station, with concomitant overcrowding of narrow pavements? This developer should be required to contribute or even bear the cost of infrastructure

improvements, such as the plan proposed. (https://dpnf.org.uk/index.php/gospel-oak-station-hampstead-heath/).

24. **CJ**

Surely there are enough high rise buildings already disfiguring the London skyline as it is
without adding even more in the proposed plans for Murphy's Yard. Surely smaller and
less imposing developments would be the right and proper way of respecting the
surrounding area and the natural beauty of Parliament Hill so close by?

25. NW

• Camden average earnings are £32k so it is hard to believe this will benefit local people. I agree the project is far too ambitious for 16 acres and will negatively impact an already densely populated borough of 32,000 people per square mile. This is twice the density of Tokyo. We must consider the quality of life and the social consequences of overcrowding. The consequences are largely negative. Two bed flats can be purchased in Barnet for 400k – with garden space. This is more realistic. Camden is only 8.5 square miles. It received half a million tourists per week and has a student population churn of 20000 per year. Camden has a lot of social problems already. We do not need to keep adding to these problems with ambitious and unrealistic developments like we've seen in Kings Cross which has taken already 15 years to build. And what for? To increase the overcrowding problems further and to create luxury flats that local people cannot afford. If our labour run council care at all about maintaining family stability in Camden and to stop this constant overseas investment and gentrification, they must think seriously about the data.

26. **DA**

This development will have a negative impact on many of the positive features in this
area. Winter bathers at the lido appreciate the morning sun and there are wonderful
views. London needs these attractions for resident and visitor wellbeing.

27. **JD**

There are major disadvantages with this proposal:
 high-rise, when environmental low-rise dense housing design is so obviously better. The
 whole area is low-rise anyway; the development would be completely out of place and

small flats, when there is urgent need for more family-sized flats loss of view – really damaging to the neighbourhood affordable homes – desperately needed and not to be avoided by developers

28. **WJ**

character

 For the residents living in the shadow of this proposed development, it will be cold, dark & depressing as they will be deprived of sunshine and natural light. They will also have to suffer years of building work and noise pollution.

- The much loved & valued assets of the City Farm & Lido will also be affected.
- The views from Parliament Hill will be ruined and blocked out in part by this monstrous development and from Kentish Town the heath will no longer be visible.
- Where is all the sewage going to go? What plans have been put into place for this with the additional 750 to 825 dwellings? Already water companies can't cope and are dumping sewage into rivers and canals on a regular basis.
- Camden is being over developed & ruined by these developments. Along the camel side, next to train lines and the St. Pancras view development.
- There is a need for more social housing but this development is weighed far too heavy on the private sector and is purely for profit. Local people won't be able to afford the prices & will ultimately be forced to move outside the area.
- Why should the local community suffer and have the area they live in ruined by a greedy developer, who will walk away and move onto the next project.