

Murphy's Yard Outline Planning Application number 2021/3225/P

Representations from EGOVRA

[Elaine Grove and Oak Village Residents' Association]

Our submission is in two parts.

This document outlines our **TRANSPORT and SAFETY concerns.**

The second document deals with broader **COMMUNITY issues.**

EGOVRA represents the residents of the Oak Village cluster of streets, which lies adjacent to Gospel Oak Overground Station and immediately to the South of Mansfield Road.

- We have some specific concerns about the development, which arise from our location in Gospel Oak, immediately to the West of the Murphy's Yard site. We believe these concerns are shared by our immediate neighbours in Kiln Place, Hemingway Close, Meru Close, Lambie Street, Ludham and Waxham Blocks, and Mansfield Road.
- Residents and workers within the wider radius of the entire GoH (Gospel Oak/Haverstock development area), which includes localities to the South and North of Mansfield Road, will also be profoundly affected by this development.

TERMS of REFERENCE

1. We believe the interests of residents of the areas West of Gospel Oak Station have not been inadequately represented and the impact on our area has not been sufficiently considered.
2. We believe there has been a **distortion in the planning framework**, to the disadvantage of our neighbourhoods, **because 'goh'** (Gospel Oak and Haverstock development area) **was not included**.
 - The terms of reference of the development arose from the **Kentish Town Planning Framework** [which we refer to as 'KTPF'], of July 2020. The KTPF did not include the area where we live. It embraced Murphy's Yard itself and a neighbouring area around Regis Road, which was designated for industrial development. It did not include what is now referred to as '**GoH**' (Gospel Oak and Haverstock development area).
 - The KTPF was informed from the earliest stages by consultations with the Dartmouth Park and Kentish Town Neighbourhood Forums. The residents of the GoH area were not in any way consulted until a late stage, when key decisions had already been taken.
 - The planning framework in consequence failed to properly consider the potential impact of the proposed development on residents to the West.
 - A more fundamental concern is that the whole planning process, including projections of social housing need, employment need and need for provision of health, social care, education and leisure services was blind to both the needs and the potential resources of the GoH.

3. We have serious concerns about the impact of overshadowing in GoH caused by the development and about its detrimental effect on our outlook.
 - Our homes are likely to be overshadowed. We have not been provided with any visualisations of how the tower blocks would lie within the landscape, as viewed from the Oak Village side.
 - Recent press coverage of the development plans has been somewhat dominated by concerns about how the proposed towers will block protected views from Hampstead Heath and other locations.
 - We live much closer. Our outlook, though it may not constitute a legally protected view, will be ruined. If the development goes ahead in its present form, then we will no longer enjoy our present view of glorious sunrises on the open horizon to the East of Oak Village.
 - We will be profoundly affected by this development, which will damage the character of our residential neighbourhood.
 - We have moral as well as legal rights which must be considered.

4. We seem to have been passed by in the way the recent planning application notices have been distributed.
 - Two small planning notices have been posted in East Oak Village and one has been affixed to an inconspicuous lamp-post on the southern footpath of Gordon House Road, just East of the site entrance.
 - There is no planning notice at Gospel Oak Station, where a lot of people would see it, nor at the site entrance itself. There are no notices in Long Oak Village nor Elaine Grove, nor along Mansfield Road.
 - The planning notices have not been amended to notify us of the extended consultation deadline of Feb 21st.
 - By contrast, large conspicuous notices, inviting us to participate in the recent GoH vision consultation were posted all along our streets.
 - Does Camden Council consider that our neighbourhood will not be affected by the Murphy's Yard development? We are entitled to complain of a democratic deficit. It does matter, because too many residents of this area have been left unaware or ill-informed about the Folgate development until very recently

We have especial concerns about transport and safety which may not have been raised by other individuals or groups. These are detailed below.

EGOVRA concerns about TRANSPORT and SAFETY

The Murphy's Yard site has very poor access, a difficult topography, with a steep change in levels between the Southern and Northern parts of the site, (the so-called 'Heath Cliff') and an extremely awkward shape, compounded by a difficult pinch-point where an open rail cutting runs through the site.

Murphy's Yard was clearly an attractive brownfield prospect to the GLA and Camden, who spotted this opportunity to provide much needed housing and employment opportunities for Londoners.

We are concerned that the proposed density of development is incompatible with the fixed constraints of the site, and especially the extra pressure this would put on transport links.

1. GORDON HOUSE ROAD-MANSFIELD ROAD: THE SITUATION NOW

1.1. THE GORDON HOUSE ROAD CONSTRAINTS

The Kentish Town Planning Framework acknowledged (p.34) the '*constrained access points to...Murphy's Yard.*'

The KTPF further notes (p.29) that '*The highway network surrounding the development is highly congested, with delays amongst the highest in London on Gordon House Road...'*, resulting in '*some of the highest levels of air pollution in London*'.

As Gospel Oak residents, we risk the hazards of Gordon House Road every day, whenever we venture out of our homes to take journeys via Gospel Oak Station or Hampstead Heath. These risks will be seriously exacerbated by the Murphy's development in its proposed form.

1.1.1. The narrow railway arch beside Gospel Oak station

- Gordon House Road passes under two fixed Victorian railway arches. The arch adjacent to Gospel Oak Station carries the line now known as the 'Overground'. The other arch lies East of the Gospel Oak Station arch and crosses Gordon House Road obliquely, just before the entrance to Hampstead Heath.
- At its narrowest point, under the railway arch adjacent to Gospel Oak Station, the road width is less than 6.5 metres. The pedestrian footpaths alongside the vehicle carriageway are only 1.4 metres (North side) and 1.6 metres (South Side) wide, at the point where the footpaths run under the bridge. Only two people can walk abreast. Owing to water seepage from the railway arch, the Northern footpath has a large puddle whenever it rains and becomes unsafe for pedestrians. Further along, between the two railway arches, Gordon House Road is still very narrow.
- **The constraints of the two rail bridges and their supporting brick structures are absolute. Gordon House Road cannot be made wider.**

1.1.2. Gordon House Road as an essential east-west artery

- The **Murphy's Yard Site** and the **GoH** together form an 'island' bounded to the South by Prince of Wales Road, and to the North by Mansfield Road/ Gordon House Road.
- The North-South arteries which bound the 'island' are Kentish Town/Highgate Roads and Malden Road/Southampton Road. Grafton Road, which formerly offered a N-S way within the 'island', is now closed to motor vehicle traffic. Haverstock Hill/Rosslyn Hill further to the West provides another alternative N-S route.
- Because Hampstead Heath lies immediately to the North of Gordon House/Mansfield Road, there is no alternative east-west route. Gordon House/Mansfield Road offers the only available East-West route for both commuter traffic and commercial vehicles. It must also allow free passage to ambulances, fire-engines, police-cars. Gordon House Road is the main east-west route for ambulances going to or from the Royal Free Hospital and the ambulance station in Cressy Road.
- It is therefore imperative for public safety, as well as for normal daily life, that traffic can flow freely along Gordon House/Mansfield Road.
- At present, numbers of blue-light ambulances pass up and down Gordon House Road/Mansfield road every day. Any delay or blockage on Gordon House Road is a potential threat to life.
- We are alarmed by the implication in the Folgate planning documents that Gordon House Road might under certain circumstances be used as an overflow route to relieve pressure on Kentish Town Road. 'Robbing Peter to pay Paul' is never a solution. The proposal appears blind to the realities of Gordon House Road.

1.1.3. The intersection of Gordon House Road with proposed new south-north route between Murphy's Yard and Hampstead Heath

- At present, Murphy's Yard traffic presents a hazard to vehicles proceeding along Gordon House Road. Vehicle traffic from Hampstead Heath exits onto Gordon House road almost opposite the present vehicle entrance/exit to Murphy's Yard and this adds to the potential for vehicle collisions.
- A core benefit of the proposed development is supposed to be provision of a new short-cut for pedestrians, cyclists and riders of scooters, skateboards, etc., between Kentish Town and Gospel Oak and the Heath.
- The Northern sector of the Murphy's Yard Site forms the narrow apex of a triangle. The Southern access to Hampstead Heath can be visualised as a similar upside-down triangle. The proposed cross-roads are situated at the narrowest possible point, the narrowest 'isthmus' of land where the apices of the two triangles glance past each other.
- It is an absurdity to propose to funnel all the traffic through this narrowest of intersections. It should have been evident from the outset that the junction cannot take any more traffic, even if we were only talking of pedestrians and cyclists. Here again, the proposals appear alarmingly divorced from reality.

1.2. GOSPEL OAK AS A TRANSPORT HUB

Gospel Oak Overground Station has over the past 10-15 years been transformed into a major rail hub. The lines running through the station carry very heavy passenger traffic, especially at peak times. To accommodate the increase in demand, TFL has added more carriages to the overground trains and both overground platforms have been extended over the bridge to accommodate the longer trains. The consequence is that there has been a very large increase in the number of passengers who use Gospel Oak Station every day.

1.2.1. Overcrowding around Gospel Oak station

- The result is overcrowding, particularly at peak times, of the forecourt, adjacent footpaths, and pedestrian crossing over Gordon House Road opposite Gospel Oak School, which were never designed for this number of passengers.
- On summer weekend afternoons, there is a danger of crush injury from the thronging crowd who must funnel through the narrow and hazardous Northern footpath which is the only available pedestrian route from the station to Hampstead Heath.
- The area around Gospel Oak Station was particularly unpleasant and dangerous during the Summer 2020 lockdown, when too many were trying to access Hampstead Heath.
- The area is regularly overcrowded at morning and evening commuter and school peaks.
- Large numbers of pupils from four neighbouring secondary schools pass along Gordon House Road en route to the Rail Station and the C11 bus stop, as well as Gospel Oak Primary School children walking between home and school, often with parents pushing buggies.

1.2.2. Flawed assumption that Gospel Oak station can accommodate more passengers

- The Kentish Town Planning Framework (July 2020) asserted that *'there is some spare capacity at Gospel Oak...Overground Station.'*
- **We believe the assumption that Gospel Oak Station can easily accommodate more passengers is seriously misleading. It ignores the narrow forecourt and constricted pedestrian access.**
- **The developers used this flawed assumption to claim that the proximity of the northern part of the site to the rail junction with supposed 'spare capacity made it suitable for a high-density housing project.**
- We believe that this to be the opposite of the truth. The constrained access should have been regarded as a key limiting factor on how many people can safely live and work on the Murphy's site.
- The KTPF did envisage a new entrance to Gospel Oak Station on the East side, with the presumed aim of providing an alternative pedestrian route to relieve congestion, but this does not feature in the current proposals.

1.2.3. Contrary to assertions in the planning documents, the C11 bus service is neither adequate nor safe

- The frequency of the C11 service is about six buses per hour, that is an average wait of 10 minutes. The intervals between buses are irregular and may be as long as 20 minutes. This can create pedestrian hazards at bus-stops.
- At peak times, the C11 is frequently packed to capacity with teenage schoolchildren and other passengers are left standing at bus-stops.
- Crowding at the bus-stop at Mansfield Road-Oak Village means pedestrians are frequently forced onto the road at this busy blind corner.

1.3. GORDON HOUSE ROAD -MANSFIELD ROAD IS CURRENTLY UNSAFE

This is true along its entire length from the intersection of Gordon House Road with Highgate Road at the Eastern end, to the junction with Savernake Road on the West.

There are multiple hazards, especially to pedestrians and cyclists.

Pedestrians are at risk from:

- Pavements that are too narrow for the volume of footfall;
- being hit by scooters and cycles riding illegally on footpaths or by collision with children's scooter and cycles;
- by colliding with other pedestrians on pavements;
- from crush injuries;
- from being forced into the road.

There is no safe route for pedal cycles, motor bikes, or electric cycles and scooters. The constrained road width means it is impossible to accommodate a separate cycle path. The constricted road width under the arches make these extremely dangerous places for cyclists. We cannot see how increased cycle etc. traffic proposed by the Murphy's Yard development can be safely accommodated.

1.3.1. There is acute traffic congestion every day at peak hours and whenever there are any roadworks. Clogged roads are also unsafe roads.

- For several weeks in Nov/Dec 2021 there were acute delays to Eastbound traffic along Mansfield Road/Gordon House Road where temporary traffic lights regulated traffic turning into Highgate Road, where G-Network cables were being laid.
- Cars were repeatedly trapped in traffic for between 20 minutes and 2 hours. Some passengers were obliged to dismount from taxis and minicabs short of their intended destinations and drag home heavy luggage. One Gospel Oak resident was delayed 20 minutes on his journey between a hospital ICU unit and his home. A heart attack or stroke victim in an ambulance could have died in that time.
- This should not be dismissed as a one-off occurrence. We are concerned that during the Murphy's Yard construction period of approx. 10 years, such delays will be chronic and 'normalised'. This is not an acceptable price for the community to pay. These delays represent chronic dangers to residents and road-users.
- The present closure of Grafton Road to motor vehicle traffic increases the pressure on Gordon House Road and contributes to traffic stoppages.

- Multiple sets of traffic lights, pedestrian crossings and vehicle exits from side roads contribute to the congestion by interrupting traffic flow. Any increase would further slow traffic.

2. THE MURPHY'S YARD DEVELOPMENT WILL INCREASE TRAFFIC

The number of vehicle, cycle/scooter and pedestrian journeys along along Gordon House Road-Mansfield Road will each increase..

2.1.

- Folgate Estates claim that, in 9+ years' time, when the development is complete, there will be a **net overall decrease in vehicular movements during both the am and pm peaks.**
- We dispute this claim. It is based on various questionable assumptions and is highly dependent on theoretical modelling. We call for new real-time measurements of traffic and pollution on both Gordon House and Mansfield Roads and independent scrutiny by Camden Council.

2.2.

- Folgate has not undertaken any real-time audit of current **pedestrian footfall or cycle journeys.**
- The main increase from the development will be in pedestrian movements but, as already noted, this hasn't been factored into the planning at all.
- There will be a huge increase in pedestrian and cycle/scooter journeys, owing to the large number of people who will use the site. We need to take account of:
 - journeys made by inhabitants of the proposed 750-825 housing units;
 - commuting journeys by people who work on site;
 - leisure journeys by those who walk through the site from Kentish Town to Hampstead Heath;
 - leisure journeys made by casual tourists and visitors to the workshops, restaurants and shops in the historic sheds.
- Over the next 10 years, Camden Council aim to build about 2000 new homes in the GoH area. This will further increase pedestrian and cycle/scooter journeys via Mansfield/Gordon House Road and the pressure on the Gospel Oak transport hub.

3. FOLGATE CLAIM TO BE ADDRESSING SAFETY AND ACCESS PROBLEMS, BUT THEIR PROPOSALS ARE INADEQUATE.

3.1.

- Folgate propose an ample forecourt at the Gordon House Road exit, which they say will increase the available footpath width on the South side of Gordon House Road from c. 2.6m to 10m.
- However, this does not solve the pedestrian access problem, because all pedestrians journeying between the Murphy's site and Gospel Oak Station would still have to pass under the rail arch adjacent to Gospel Oak Station, where the footpath width is less than 1.6m.
- Folgate refer to this forecourt as the 'Gospel Oak Character Area' at 'Gordon Gate' (see Parameter Plans, p.7 of 14). This designation, together with some imaginative artists' impressions, convey an illusory impression of space, ignoring the narrow road and brick wall on the far side.

3.2.

- At a transport planning meeting with EGOVRA and other Gospel Oak residents' groups on 15 Dec 2021, Folgate unveiled a proposal to relocate the vehicle exit to Gordon House Road to a position between the two rail bridges and move the existing pedestrian crossing Westwards to a location directly opposite the entrance to Hampstead Heath.
- We think these proposals are potentially unsafe and may create more problems than they solve. There is a need for independent scrutiny and risk-assessment.
- The proposal is a response to a paragraph in the KTPF. This identified problems for vehicles entering or leaving the site from the Gordon House Road vehicle access point in terms of '*poor visibility, high volume of slow-moving traffic in peak hours and local weight restrictions*'. We don't believe the current proposal offers any real solutions to these problems.
- Although the proposal is a response to a KTPF recommendation, we consider it potentially unsafe in the following ways:
 - The exit has been moved to precisely that stretch of road with constrained width.
 - Outgoing vehicles would risk collision with traffic along Gordon House Road.
 - Pedestrians on the southern side would be obliged to cross the vehicle exit.
 - This would add to the hazards of the pedestrian route between the Murphy's site and Gospel Oak Station.
 - There would be an inadequate turning circle for large vehicles and these would block East-West traffic flow.
 - The Murphy's exit, in line with the site boundary parallel to the rail track, is dangerously close to the Gospel Oak Station rail bridge.
- The proposal to move the existing pedestrian crossing to lead directly to the Heath poses other dangers, which have been inadequately assessed. There has been no consultation, so far as we are aware, with the Hampstead Heath authorities or with TFL.

3.3. We do not believe we are being adequately consulted.

- At the 15 Dec 2021 Murphy's Transport Planning Meeting, we were perturbed by the narrowness of Folgate's vision and the way that they only considered the safety issues for their own vehicles. They had not consulted the Hampstead Heath authorities or Camden Council or local schools or sports groups using the Heath about the proposed changes. They appeared totally ignorant of the history of safety issues and past measures on Gordon House Road.
- Folgate conceive the 'Community Partnership Forum' as a channel for fine-tuning of proposals already agreed in principle. **Folgate presupposes that the safety/transport problems along Gordon House Road are soluble without changing their parameters or terms of reference. We disagree.**
- We note that Folgate did not respond to a letter sent to them by EGOVRA in June 2021 until 6 months later in 25 Jan 2022, by which time the planning application had already been submitted. This letter requested detailed information to be supplied by Folgate regards their plans.
- Folgate were dismissive of the traffic holdups from G-Network roadworks in Highgate Road as a 'one-off'. Residents felt this was not an appropriate attitude and would not help to solve the problems of Gordon House Roads congestion.

4. CONSTRUCTION TRAFFIC

- We are deeply concerned about the proposal to route all Phase 4 construction traffic (that is, the construction of Residential Blocks O/M and P, within the Northern sector of the site) via Gordon House Road.
- Folgate estimate that *'During the peak months, there will be approximately 1,500 construction HGV vehicles accessing the site per month and approximately 750 LGV vehicles per month. On this basis, the average number of vehicles in a peak month is approximately 65 to 75 HGV (two way) vehicles per day and approximately 30 LGV (two way) vehicles based on a 5.5 day working week.'*
- **We believe that the projected level of construction traffic is beyond the capacity of Gordon House Road. There is a very real potential danger to life. Ambulances on their way to the Royal Free Hospital, fire engines and other emergency vehicles might not be able to get through.**
- There would also be other grave social and economic costs. We believe that the daily toll of construction traffic would severely damage the quality of life of the surrounding communities.
- Phase 4 is projected to be spread over years 7-9 of the development, i.e. roughly 2029-2032. This may seem far off, but the burden on the community would be intolerable.
- This could lead to a negative spiral, in which people move away from an area which is no longer a good place to live.
- We therefore insist that the access routes within the development are modified, to enable Phase 4 construction vehicles to access the Northern Triangle from a different entry point. This will require radical rethinking of the disposition and massing of many of the blocks.

5. MOTOR VEHICLE, CYCLE AND PEDESTRIAN ROUTES WITHIN THE MURPHY'S YARD SITE.

5.1. Pedestrian, cycle and vehicle routes within the development are inadequately specified.

- We are concerned that cycling is being encouraged, but safety issues have been ignored.
- There is no overall plan for making cycling (or use of electric scooters) safe for pedestrians or for cyclists themselves.
- Cyclists need to be separated from both pedestrians and motor vehicle traffic, in other words a dedicated South-North cycle route on the site is needed.
- As cycling over the Heath is not permitted, cyclists would need to dismount and park their cycles either at the Gordon House Road site exit or in front of the Lido. Extra cycle racks would need to be provided.

5.2. It is potentially unsafe for there to be only one vehicle access-point to the northern residential blocks.

- From the parameter plans, we see that the vehicle service road will run along the site boundary, parallel with the railway track, as far as the proposed 19-storey tower block.
- The main entrance to the Southern part of the site will be from Sanderson Close.
- These two roads do not appear to link up.
- Should there be an explosion, fire, or medical emergency in the Northern Triangle and Gordon House Road was at that time blocked by traffic, fire engines and other emergency vehicles would not be able to get through in time and lives could be lost.
- We therefore believe that a through vehicle route is essential, albeit to be used only for construction traffic and emergency access.

5.3. We believe it will be necessary to widen the vehicle access route along the site boundary, to make space for a footpath and vehicle drop-off points.

- The rationale for this is that Camden's stringent environmental policy of minimising motor traffic may prove incompatible with providing the level of access that elderly and disabled people and families with young children need to their homes.
- The parameter plans do not specify the exact width of the vehicle access road. We understand that it will be wide enough for two vehicles to pass, i.e. for two-way traffic but it appears that there is not space for parking or for loading or unloading of passengers or goods. There is no space for a footpath. The residential blocks appear to be designed so that there are no entrances on this side.
- We therefore think it would be unwise to preclude the possibility of depositing people and goods on their doorstep in certain circumstances, and to do this it would be necessary to widen the vehicle access road.
- This would have the effect of displacing the housing blocks laterally

5.5. It will also be necessary to displace the vehicle access road westwards to leave space for an essential green screen between the new blocks and the railway line.

- Folgate wish to 'thin' the existing screen of Leyland Cypress and replace them with more suitable' deciduous native species which would facilitate greater biodiversity.
- However, it appears from scrutiny of the Gordon House Road plan, that the existing trees are superimposed upon the location of the new service road. It appears that all these trees would need to be removed to make space for the vehicle access road. There would then be no green screen between the new blocks and the railway line
- Gospel Oak residents whose homes overlook the railway track have made it plain that they consider it essential to preserve the density of the existing screen, which should be evergreen, to provide year-round buffering of noise (arising from reflection and amplification of the noise of the trains which would occur if the housing blocks were immediately adjacent) and filtering of pollutants. Indeed, this screening should be increased.
- Displacing the service road Eastwards would again entail displacing the housing blocks, in particular the northernmost Block O-M.

On both counts, we therefore urge that it would be premature to give outline planning permission for the presently proposed footprint of O-M block.

6. CONCLUSIONS AND RECOMMENDATIONS

6.1. We believe that the constraints of Gordon House Road are incompatible with the proposed density of the Murphy's Yard development.

- The development will create a large increase in pedestrian, cycle and motor vehicle journeys which will exceed the capacity of the transport system.

6.2. Gordon House Road does not have the capacity to take the proposed construction traffic.

- **The proposed construction traffic plan, using Gordon House Road as sole access point for Phase 4, would have a disastrous impact on community well-being and potentially creates risk to life as indicated above.**
- We cannot countenance this.
- We believe the only solution will be to **provide a vehicle through-route from Sanderson Close** to the Northern part of the development, for use during construction and as a permanent emergency access route.

6.3. O-M Block is too close to Gordon House Road and to the Western site boundary parallel with the Overground rail track. The proposed new vehicle access route is also too close to the boundary.

- The vehicle access road will need to be shifted laterally, to make space for an essential tree screen to protect residents on the Gospel Oak side of the rail track.
- It also needs to be widened to permit direct vehicle drop-off to the housing units.
- It is not proven that the proposed new vehicle exit to the Gordon House Road is safe. It may be that vehicle exit must revert to its existing location.
- Any new Eastern entrance to Gospel Oak Station would have to be at the currently proposed current location of O-M Block.

For these multiple reasons, it is not safe to give outline planning permission for the current footprint of O-M block.

6.4. The only ways to increase pedestrian and cycle capacity and create safer access and crossing points along Gordon House Road are **an eastern entrance to Gospel Oak station and/or a pedestrian/cycle bridge over Gordon House Road.**

- These possibilities have not so far been given serious consideration and do not feature in the current proposals.
- This must change.