

REDINGTON FROGNAL
NEIGHBOURHOOD FORUM

20 February, 2022

Dear Mr. McClue,

Murphy's Yard 2021/3225/P - objection

Redington Froggnal Neighbourhood Forum objects to this over development on the grounds that it is not sustainable development, and not in accordance with the National Planning Policy Framework (NPPF). Examples of non-compliance with the goal of sustainable development are:

1. Woefully inadequate provision of green space per resident. Camden's Local Plan policy A2 has a requirement of 9 sq. metres per resident. Based on an estimate of 2,000 residents, the development should create 18,000 sq. metres of open space.
2. Harm to Hampstead Heath¹ and its wildlife. The development will be harmful to this existing priority habitat and does not respect the general duty to conserve and enhance biodiversity, as required by the Environment Act, and will not produce an increase in biodiversity. A hard-paved walkway with occasional flowerbeds and isolated trees of negligible ecological value clearly offers no mitigation.

The intensity of use of Hampstead Heath, with 15 million humans and 10 million dogs annually, has already resulted in dramatic reduction in the number of bird species, including sparrows, skylarks and green woodpeckers. Based on an area of 790 acres (3.2 million sq. metres), this implies an average of 4.7 people and 3.1 dogs per square metre per year.

Adding over 2,000 residents here, along with staff at 48,000 sq. metres of industrial space and 70,000 sq. metres of office space, without recourse to other meaningful green space, cannot be considered sustainable development. The proposal is therefore not in conformity with the NPPF: specifically paras. 11, 145, 147, 148, 174, 179, 180, 182.

3. The proposal envisages tower blocks of up to 19 storeys for residential use. This runs counter to findings from the GLA's Planning and Regeneration Committee² that tall buildings will not produce the high-quality homes and neighbourhoods that London needs and Matthew Carmona said that "... in general families are disadvantaged if they are living in tall buildings."
4. The proposal also contravenes the NPPF in that it will not be "sympathetic to local character and history, including the surrounding built environment and

¹ Hampstead Heath is designated Metropolitan Open Land, a Site of Special Scientific Interest (SSSI) and a Site of Importance for Nature Conservation (SINC).

² Housing typologies investigation findings, 2 September 2021 and Consultation Response, Good Quality Homes for All Londoners London Plan Guidance, 14 January 2021.

landscape setting" (para. 130) and will cause substantial harm to surrounding heritage assets (paras. 194, 195, 197. 199, 200, 201) and SSSI (para. 180).

5. The proposal is not in accordance with NPPF (paras. 147, 148), the Mayor's London Plan 2021 (Policies G3, G6, HC3 and HC4), London View Management Framework, the relevant neighbourhood plans (para.2), which incorporate policies on the openness of Hampstead Heath and views from it: Hampstead Neighbourhood Plan (Policy NE 1) and Dartmouth Park Neighbourhood Plan (Policy ES 1); and the Camden Local Plan (Policy A2).

Yours sincerely,



Secretary

Redington Frogna! Neighbourhood Forum
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