

# **Murphy's Yard Outline Planning Application number 2021/3225/P Representations from EGOVRA [Elaine Grove and Oak Village Residents' Association]**

This is the second of two EGOVRA submissions and deals with a broad range of community issues.

We set out our concerns below, in relation to:

- **EMPLOYMENT**
- **HOUSING**
- **ENVIRONMENT**

We then address two wider issues and proceed to sum up the benefits and disbenefits of the proposed scheme.

We conclude with an appeal to decision-makers and suggestions as to new opportunities if the development is reframed.

## **KEY ISSUES**

- **To what extent does this high-density development meet the original planning objectives?**
- **Do the benefits to the local community outweigh the disbenefits?**
- **The development could be improved if the needs and resources of the GoH area were integrated into the planning framework.**

## **FRAMEWORK FOR ANALYSIS**

- The Murphy's Yard development was driven by GLA and Camden directives on provision of industrial/employment floorplace, as well as the need to provide 750 more homes for Camden residents.
- The KTPF framework specified laudable objectives for making the new neighbourhood a balanced community and a good place to live.
- How far are the various targets compatible with each other?
- Our comments are not intended to be comprehensive, but to augment those you have already received from other community groups.

# 1. EMPLOYMENT

## Provision of industrial/employment floorspace and new employment opportunities

Folgate has undertaken to ensure

- **'access to employment opportunities through the delivery of significant commercial floorspace, including industrial use, affordable workspace, warehouses and creative uses'**.

They say

- **'There is the potential to provide up to 3,610 new jobs'**.

There has been some consultation with LB Camden Officers and the Gospel Oak Job Hub. Initiatives are to include some construction apprenticeships, which would certainly be a good thing.

However, their commitment has been left vague and the range of employment opportunities and commercial ventures outlined does not relate directly to any audit of the services the community needs.

- **There is no evidence of detailed community consultation and there has been no opportunity for the community to take ownership of the employment initiatives.**

There is a good model for a grassroots community-driven employment initiative in the proposals of the London School of Mosaic (LSoM) to develop a range of craft workshops within the currently vacant space of the undercroft of Ludham Block in Mansfield Road.

The educational activities of the LSoM are socially inclusive and provide opportunities for local people, including young offenders and adults who have lacked educational opportunities, to develop their creative potential, gain in confidence and raise their aspirations.

**Folgate could learn a lot from the LSoM model, but this has not been their approach.**

**The listed locomotive sheds** offered an invitation to create a Kings Cross-style development. The restaurants, shops, and craft workshops will yield commercial benefit to Folgate but, again, **don't link directly to community needs.**

- The revitalised sheds will attract visitors and tourists from far afield, who will **increase pressure on transport networks**. They will enjoy the restaurants, luxury niche shops and craft boutiques, but **the commercial profits will not go directly to the community.**

**It is unclear what proportion of workspace is designated as 'affordable' and what proportion of industry/workshops will be purely commercial.**

- A good step forward, which would promote confidence in the good intentions of the developers, would be to audit the needs of the local area in consultation with residents and tradespeople, for local premises for trades such as builders, electricians, carpenters, plumbers, gardeners, etc. and to commit to specific projects.

The Kentish Town Planning Framework states that (p.63):

*'the Council will expect redevelopment to:*

- **Retain the existing quantum of industrial floorspace (B1c, B2, B8 and sui generis of a similar nature)'**.
- **Note that the existing industrial floorspace is about 20,000sqm.**

**By contrast, Folgate are proposing a total of 95,000sqm of non-residential floorspace.** The parameter plans reveal Folgate's intent to build a new row of very large industrial buildings of up to 8 storeys, to provide this additional floorspace.

- Folgate appear to be responding to a draft London Plan policy that was struck out by the Secretary of State before adoption. **There is no policy imperative for the floorspace.**

**If Folgate were to reduce** the amount of industrial/commercial floorspace **to the same floorspace that is on site now** there would be space to redistribute the 750 homes in a community-friendly, sustainable, low-rise fashion.

### **CONCLUSIONS: Employment opportunities and affordable workspace**

- The developer offers no clear guarantees on the amount of 'affordable workspace' to be provided within the new development, nor its character or suitability for specific enterprises.
- The commitment to providing new employment opportunities is at a general level and is not informed by consultation with the community as to what type of new opportunities or ventures would be most suitable, or most enhance the lives of the future skilled craftsmen or entrepreneurs.
- There is no specific commitment to providing education or training.
- The proposal is not linked to a detailed analysis of the services needed by the community.
- The scheme is conceived in relation to Kentish Town; it does not take into consideration the employment needs or resources of the Gospel Oak /Haverstock area of social deprivation.
- The revitalised locomotive sheds would be dominated by commercial ventures and bring in day-trippers from outside. The balance of benefit would be to Folgate as landlord, rather than directly to the community.
- The proposed provision of new industrial floorpace exceeds by a ratio of about 4.5 the amount required by Camden Council. It is unclear what percentage of this would be purely commercial.
- The need for industrial floorspace needs to be reassessed in order that surplus space can be released for housing.

### **SUMMARY**

- **The Folgate application provides little evidence of concrete benefit to either the Gospel Oak/Haverstock areas or to Kentish Town in terms of provision of industrial/employment floorspace and employment.**
- **Moreover, it is clear from the planning application that during the construction period of approximately 10 years, these areas will experience considerable inconvenience, challenges and risk to health, as outlined in EGOVRA's submission on Transport and Safety.**
- **EGOVRA strongly objects to this application and asks that Camden Council refuse it on the grounds outlined above.**

## 2. HOUSING

### To what extent does Folgate's housing offer meet the KTPF specification for new homes?

#### 2.1 Number of homes and height of housing blocks

- The KTPF anticipated '*that the Murphy site could deliver in the region of 750 homes*', though this would depend on '*a number of factors*'. This was not a rigid demand; it was intended to offer flexibility and it was open to Folgate to deliver less or more homes.
- Folgate clearly regarded 750 as a minimum and decided that they could only squeeze 750 homes into the Northern sector designated as suitable for a new residential neighbourhood, by building upwards.
- The current planning application raises the target to 825 homes.
- Folgate haven't conformed with Camden's original specification that buildings should be '*to a general height of eight storeys*'. The plans show a predominance of housing blocks higher than this.
- Note that blocks higher than 8 storeys '*will be considered 'tall buildings' and will be subject to the additional considerations in Policy D1 of the Local Plan*'. It will be important to check whether the blocks do conform with Policy D1 criteria.
- The parameter plans indicate three housing blocks of 9, 10, and 11 storeys respectively, and with four towers rising to 14, 17, 17 and 19 storeys, strategically positioned at the very point where the ground rises to its highest point above sea level (the summit of the so-called 'heath cliff'.
- There is no clear design justification for the increased target to 825 homes. Since the buildings shown on the plans are empty shells, with no details of how they will be internally divided, it is impossible to know how 75 more homes would be squeezed in or what compromises this would entail.
- It is not unduly cynical to suggest that this is a strategy to ensure that even if the target of 825 homes is reduced by the planning committee, they would still get permission for the 750 homes they really wanted.
- Folgate are clearly driven by commercial considerations, at the expense of quality of life for local people.

#### 2.2 Affordable housing

- The July 2020 KTPF (p66) identified a '**Priority for affordable housing**'.
- Camden's target at that time was '*50% affordable housing*', which has since been reduced to 35%.
- Folgate are not prepared to give a firm commitment to provide even 35% 'affordable' housing, claiming that this not 'viable'.
- The bulk of the housing units would therefore be sold at market prices.
- It has been estimated that a 2-bedroom flat in one of the towers will cost up to £1,000,000 at today's prices. This is about 28 times a putative salary (say £35,00) for a typical Camden resident.
- Only the extremely wealthy will be able to afford to purchase these flats. The flats, with their spectacular views over London, would be attractive speculative investments for commercial landlords, including overseas investors. The people who would live in the flats would be young, transient, affluent professionals, with busy working lives, without strong associations with the local community.

### 2.3 'A policy compliant mix of one, two, three, and four-bedroom homes'

- Camden specify (KTPF p.67) '*A diversity of housing types across private and affordable sectors should provide choice, cater to different housing needs and help create a mixed and balanced community*'.
- Housing should meet the needs of people of all ages and stages, including families and older people. A proportion of homes should be designed for wheelchair users and homes should be accessible and adaptable.
- Camden further stipulate that there should be a preponderance of 2 bed and 3 bed homes, which should each make up 37.5 % of the total, i.e. 75% of all homes should have 2 or 3 bedrooms.
- Folgate propose to skew the balance towards 1 bed and 2 bed homes. 50% would be 2 bed and 1 bed would constitute 38%, compared with 8% in Camden's specification. If 825 homes were approved, just 14 would be family (4 bed) homes.
- **A development consisting of 88% 1 and 2 bed homes clearly does not meet local housing needs and cannot create a socially diverse, inclusive and well-balanced new neighbourhood.**
- The housing offer has drifted so far from the original specification that the benefits to the community are hard to discern.

### 2.4 Good homes for people and a flourishing community?

- It is already apparent that the main driver of the proposed development has been the need to build at high density, to maximize profit and not the principles of good community design.
- The Folgate proposals make minimal provision for outdoor green space or for private or communal gardens. The benefits of access to outdoor space for everyone, but particularly for families with children, go almost without saying, but have become even more apparent in the recent Covid-19 pandemic and lockdowns. Failure to make substantial provision in this area demonstrates negligence towards the health and wellbeing of the development's future residents.
- The developers have not considered what features homes require to meet the needs of families. Instead, they have provided the dimensions of a series of empty boxes and left the details to sort themselves out. The plans give us no idea in which block or on what floor the rare 4 bed family homes might be situated, nor whether the ground floor flats of some blocks might have individual gardens.
- Such a scheme is unlikely to turn out to be family-friendly and there are bound to be all sorts of negative social consequences, because the realities of family life have not been considered.
- It is surprising that the developers should have been so oblivious to the social aspects of the scheme, because there is a huge body of relevant research and many exemplars of good practice.
- The Cherry Tree Court housing project, was part of Phase 1 of the redevelopment of The Bacton Estate, won 'Housing Project of the Year' and other civic awards in 2016. It is an interesting example of community-led good practice in housing development in the GoH area, which Folgate does not appear to have considered.

- An article in *The Guardian* in 2016<sup>1</sup> highlighted the painful contrast between life on the West Hendon Estate, built by commercial developer Barratt Homes, and the delight and pleasure experienced by new residents who moved into their new town houses on the Bacton Estate. To quote: *'Before, I would leave my door open and see people all the time'*, says one elderly resident, in tears, sitting alone on her sofa in her brand new flat. *'Now I don't see a soul'*.
- Unless there is a radical rethink, the Folgate development seems set fair to go the way of the West Hendon Estate. Reliable research makes clear that tower Blocks breed loneliness.
- We already know that good neighbourliness emerges in low rise developments, where neighbours face one another across a street. There are endless examples in the surrounding neighbourhoods. It would be wise for Folgate to take lessons from Camden's own housing initiative.
- 'Defensible space theory' (Newman, 1972, Cozens, 2002) has yielded pointers to how housing estates may be designed to discourage crime. Key principles are territoriality and surveillance. Tower blocks with corridors and stairwells which belong to no individual and cannot be seen from within are breeding grounds for crime.
- A related notion is the importance of **internal 'locus of control' for mental health.** **Communities thrive where people have 'ownership'** (not just in the physical sense) of their own homes and the surrounding social space and have scope to make their own decisions about social arrangements. Thus, for example they might be allowed to choose their own kitchen units and choose trees and shrubs for individual or communal gardens and organise their own house and garden maintenance.
- At present, there appear to have been few attempts to engage the future inhabitants of the Folgate development in design decisions, but there is still time for this to change.

## CONCLUSIONS on Housing

- The housing offer relates only tangentially to Camden's policies for 'New homes that meet need'.
- In the July 2020 KTPF, Camden's target for affordable housing was 50%. Camden has since reduced this to 35%. However, in their planning application, Folgate were not prepared to give a firm commitment to providing even 35% affordable housing. This is unacceptable to EGOVRA.
- The housing mix, with 88% 1 and 2 bed homes, does not conform to Camden's policies or meet the housing need. This is unacceptable to EGOVRA.
- The project is not informed by principles of good community housing design. The homes are likely to prove unsuitable for families and lead to social problems.
- The housing offer is not in tune with Camden's ambition to develop 'innovative housing models' and housing choices that would 'support the creation of mixed, inclusive and sustainable communities'. There are no opportunities for people to take pride in their community.

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<sup>1</sup> <https://www.theguardian.com/artanddesign/2016/mar/14/winners-and-losers-london-social-housing-divide-barnet-camden>

- On the contrary, the dense high-rise blocks will lead to loneliness and damage mental health; the anonymous character of the blocks, lack of ownership of space and deficiencies of surveillance are all features that will encourage crime.
- The housing offer is driven by commercial profitability and does not meet local housing need.
- The housing development will benefit the developer and commercial investors, at the expense of the local community. The homes are not good or suitable homes for local people.

## **SUMMARY**

- **There are few concrete benefits to either the Gospel Oak/ Haverstock areas or to Kentish Town in terms of housing provision. This is very concerning and disappointing.**
- **The inconvenience and potential harm to the above communities and areas, during the construction period of approximately 10 years, will be considerable.**
- **EGOVRA strongly objects to this application and asks that Camden Council refuse it on the grounds outlined above**

### 3. ENVIRONMENT

The intrusive nature of the high-rise blocks and incongruence with the character of surrounding neighbourhoods has attracted much public debate and many representations from others, so this commentary will not be comprehensive, but will focus on matters of especial concern to Gospel Oak residents.

#### 3.1 The development is incongruent with surrounding residential neighbourhoods

- The KTPF (p.66) identifies the northern sector of the Murphy site as 'particularly suitable for the delivery of new housing as it is 'surrounded by residential neighbourhoods and next to Hampstead Heath'
- The KTPF attaches great importance to the integration of the new housing development with surrounding neighbourhoods and is at pains to reiterate this:
  - The new neighbourhood should be '**seamlessly integrated** and well-connected with surrounding neighbourhoods of Kentish Town, Gospel Oak and Dartmouth Park'. (p.37)
  - Industrial, commercial and creative activity should be '**harmoniously provided** alongside **high- quality homes that support a diverse local community**' (p.37).
  - At the northern edge, buildings 'should respond to the green biodiverse corridors and railway edges and setting of Hampstead Heath' (p. 48).
  - 'The existing context is varied with low to mid-rise development on a traditional street network and some taller buildings' (p.55). This is the context that the developers were asked to match.
  - 'It is important that development is a good neighbour to the existing communities around the development sites. Development along the western edge should help foster connections with the adjacent communities in Gospel Oak, **avoiding development that turns its back or creates barriers** between neighbourhoods' (p.55).
- There is therefore a serious discrepancy between the tower blocks proposed by Folgate and the sympathetic development specified in the KTPF:
  - There is no 'seamless interface'. On the contrary, the looming tower blocks are totally out of character with their surroundings.
  - The blocks at the western site boundary were not supposed to **turn their backs** on the adjacent Gospel Oak community but do precisely that. There are no entrances on the western side. All the doorways face inwards. The vehicle access road parallel to the boundary is not intended for pedestrians and does not allow access to the homes from this side. The row of high blocks forms in effect a **barrier wall**.



### 3.1.1 High-rise is inappropriate for the location and contrary to GLA policy

- **The height profile of the Murphy's Yard housing blocks bears no relation to that of buildings in the closest adjacent neighbourhoods.**
- None of the following buildings rise above five storeys: Lissenden Gardens and Heathview on Gordon House Road; buildings within the Gospel Oak cluster (Oak Village, Elaine Grove, Lambie Street, Kiln Place, Meru Close, Hemingford Close).
- It is true that Gospel Oak has some taller buildings, such as Barrington Court and Bacton High Rise. These results of past development follies are blots upon the landscape, and not examples to emulate. They are exceptions to the general low-rise character of the neighbourhood.
- By contrast, a **majority** of the Murphy's Yard housing blocks are designated 'tall buildings' of over 8 storeys. There appears to be no provision of the type of individual houses with gardens which are characteristic of surrounding neighbourhoods.
- The London Plan, at the government's insistence, now bars high-rises outside locations specifically designated as being suitable for high-rises. The Camden local plan hasn't caught up with the London Plan and is silent on the matter.
- Nevertheless, it is clear from the KTPF that high-rise was never envisaged and it is surely inappropriate. It is not GLA Policy to convert residential inner-suburb neighbourhoods into Barbican-style developments.

### 3.2 The tower blocks will overshadow our neighbourhood, take our light and spoil our views

- We believe that the tower blocks will **overshadow** our neighbourhood and reduce daylight in Oak Village. We therefore wish to add our objections to those already submitted by residents of Kiln Place and Meru Close
- Folgate have submitted a Daylight and Sunlight report showing shadowing at different times of the day and year. The extent of overshadowing and loss of daylight is currently in dispute.
- Camden Council have given assurances that the relevant documents are to be independently verified. We welcome this.
- The various photomontages to help visualise the blocks in relation to the surrounding landscape do not include **views** from Oak Village. There has so far been no response to our request to Folgate to provide mock-ups of our future view of Murphy's Yard.
- As we are much closer to Murphy's Yard than the relatively distant viewpoints from which existing photos were taken, the blocks will loom much larger in relation to the landscape.
- Our current unimpeded view of the rising sun in the East against a clear horizon is not a statutory 'protected view'
- However, we have a moral right not to have our enjoyment of our environment irreversibly spoiled.

### 3.3 Greening and biodiversity

- We have already referred in Part One of this submission to a potential conflict between Folgate's aspiration to increase biodiversity within the Murphy's Yard site and the interests of Gospel Oak neighbours whose homes are close to the boundary railway track.
- Folgate assert their intention to 'thin' the existing screen of Leyland Cypress along the boundary and replace these trees with 'more suitable' deciduous native species, which would facilitate greater biodiversity.
- However, this 'thinning' would mean in effect complete removal of the existing Leyland Cypress trees, since there does not appear to be the necessary width to accommodate both the new service road and the trees between the boundary fence and O-M block.
- A year-round evergreen screen between the new blocks and the rail track is essential for the well-being of Gospel Oak residents whose homes are adjacent to the rail track.
- It would be intolerable and unacceptable for there to be no green filter between the new blocks and the rail track.
- The green screen will be essential:
  - To protect residents against noise which might otherwise arise from reflection back and forth and consequent amplification of noise between the hard walls of the buildings and the trains. This has been an unforeseen problem in neighbouring Vicars Road, where the housing blocks of Cherry Tree Court immediately abut the rail tracks. It is unacceptable to make the same mistake again.
  - To filter pollutants.
  - As a visual screen.
- It is not acceptable for the laudable aim of biodiversity on the site to become an excuse for a failure to protect the physical environment of residents of adjacent properties.
- There has been a more general failure to acknowledge that there is simply not enough space for all the buildings and the extent of 'greening' originally promised. Where aspirations and targets are in conflict, it is important to ensure that plans are transparent, to enable informed critical judgments about which are the best compromises to make.

### CONCLUSIONS on environmental impact

- The tall blocks in the current proposals would irrevocably change our local environment for the worse.
- The interference with our light and our views are detrimental to our current quality of life.
- We consider that the proposals violate our citizens' rights to continue to enjoy the quality of environment and amenity to which we are accustomed.
- We can see scarcely any environmental benefits for us within the site itself. The development as currently proposed would detract from, rather than enhance our present enjoyment of Hampstead Heath.
- The removal of the 'green screen' protecting residents who live close to the boundary rail track is unacceptable to EGOVRA.
- Camden Council has excellent policies and recommendations for best practice in protecting the environment. It is a council which prides itself on being environmentally friendly.
- Should Camden approve the current application, it would not be complying with its own policies and would be failing to meet GLA requirements.

**EGOVRA strongly objects to this application on the environmental grounds outlined above and therefore calls for Camden Council to reject it.**

## **WIDER ISSUES**

### **Dangers of developer ownership and control**

- Murphy's Yard is an extreme example of complete developer ownership and control.
- Folgate Estates will retain the freehold of the entire site, so that all housing and commercial units will be rented or on long leaseholds.
- Folgate are proposing that all services, such as window-cleaning, electrical repairs or redecoration will be centralised.
- Folgate are retaining their own central offices, on land which is not part of the development scheme, as well as some of their own commercial operations at the southern end of the site.
- It is arguable that this quasi-feudal arrangement will disempower the residents and result in dependency on centralised services.
- This is the opposite of the sort of autonomous, empowered, self-motivated, ambitious, proud, confident and happy community that Camden aspires to create.
- Camden would be wise to insist that the developers engage members of the community fully in the design process.
- Camden should reject any proposal that does not conform to its original community-driven design criteria and its demanding specifications in relation to design quality.

### **Danger of forcing out residents by irrevocably damaging the character and community of the area**

- North London residents living near the Folgate development face the prospect of the future obliteration of the character of their residential communities.
- Were this inappropriate Barbican-style development to be allowed to proceed, the Murphy's yard site would no longer 'belong' to the local community.
- The current offering of one- and two-bed flats to be retailed at high prices will be populated predominantly by young transient high-income professionals. Many of the flats will be bought as speculative rental investments and would often be left vacant. The scattering of occupants of the affordable homes would find themselves isolated and bereft of social support.
- Over the ten-year construction period, the noise, dirt, traffic delays, difficulty of getting to work and appointments on time, and the very real hazards will likely discourage residents from remaining in the local area.
- The neighbourhood would no longer be a pleasant place to live; it would have lost its soul.
- The developer appears to argue that family housing is not needed, because families are already moving out of the area and school rolls falling. Failure to offer adequate provision for families at Murphy's Yard would accelerate and perpetuate a vicious spiral.
- Camden has an obligation to intervene. The encroachment of an inner-city environment and killing of the spirit of our residential communities is not what Camden intended.
- Nor is this in accordance with GLA policy, which aspires to preserve London as a living city which is a good place to live. If the model proposed by Folgate were to be repeated all around the inner periphery of central London, the hollowing out of communities would leave the city an empty shell, a shadow of its former self. This has been the fate of many USA cities and we should not assume it cannot happen here.

**We therefore call upon Camden to reject the current planning application**

## **SUMMING UP: Balance of Benefits and Disbenefits**

- Ownership, control and financial benefit from this development, in its current form, have shifted from the community to the developer.
- For Folgate, the development will yield profit from sales of homes, a continuing stream of income from rental flats, ground rent from long leaseholders, income from the rented commercial and industrial workspaces and from its own commercial operations at the South of the site.
- Camden Council will gain additional council tax yield. There will be payments of CIL (Community Investment Levy) totalling around £38 million over the 10 -year construction period. This yield for Camden is relatively low in the scale of things.
- For the community, the original lauded benefits have been so diluted and compromised as to be barely discernible. The homes are not suitable or affordable, greening is not as promised, few health, educational or leisure facilities are guaranteed. Little remains to benefit the community apart from a footpath.

The community **disbenefits** are very substantial:

- Transport congestion and unsafe roads.
- Dirt, noise, disruption of daily life from construction traffic for years to come.
- Looming blocks and overshadowing.
- Destruction of the character of nearby neighbourhoods.
- Damage to the quality of life of residents of adjacent neighbourhoods.
- Likely vicious spiral, forcing out existing residents.

**The sense of outrage from the community at this profoundly damaging development is not without good reason and deserves to be taken very seriously.**

**We are concerned that too many housing blocks and too many new buildings designed for commercial use are being squeezed into the site, at the expense of the quality of life of those who will live and work in the new community.**

**We consider that only a radical redesign from first principles will suffice.**

**EGOVRA therefore urges Camden Council to reject the current application for outline planning permission, for all the reasons laid out in our two submissions.**

## **An appeal to the Planning Committee**

- A decision to ask Murphy's to recast their development plans will be a difficult one for Camden Council to take. We appeal to all the members of Camden Council who will be involved in this decision to take a broad and long view. What sort of London do we wish to create for the future?
- It would be unwise to be tempted by immediate financial stringencies to sacrifice the long-term wellbeing of local communities and of future generations.
- **We would remind the Council of their over-arching responsibility, both to existing residents of surrounding neighbourhoods and to future residents and workers of the Murphy's Yard site, to preserve and enhance residential communities which are good places for people to live. The net benefits to all, in terms of quality of life, need to be greater than the disbenefits.**

## **NEW OPPORTUNITIES**

- There is an opportunity to relocate the 750 homes into the surplus commercial space on the site, enabling a community-friendly low-rise development.
- A pause and a rethinking of the development framework could enable the incorporation of the **GoH** (Gospel Oak /Haverstock) community into overall planning.
- Provision of education, health, and leisure facilities, as well as other essential services, could then be related to the needs of the entire area.
- There would also be an opportunity to integrate housing and employment policies.