



18<sup>th</sup> February 2022

West Kentish Town and Gospel Oak Neighbourhood Forum

## **OBJECTION TO PLANNING APPLICATION NO. 2021/3225/P FOR THE REDEVELOPMENT OF THE MUPHY SITE**

West Kentish Town and Gospel Oak Neighbourhood Forum calls on Camden Council to refuse the planning application submitted by Folgate Estates Ltd on the grounds that the Environmental Impact Assessment is inadequate and misleading. The Environmental Impact Assessment is biased in favour of the developer to an unacceptable extent. Adverse environment effects are presented as positive, eg. the dramatic changes to views are presented as 'beneficial'.

The Environmental Impact Assessment should not be accepted by Camden's planners as valid, as it does not meet the required standards (The Town and Country Planning (Environmental Impact Assessment) Regulations 2017. Throughout the document the assessment fails to properly consider 'receptors' within West Kentish Town and Gospel Oak neighbourhood area and does not fully assess 'impacts'. It treats the Murphy Site as an island and dismisses the impact on neighbouring areas. An example of this is the dismissal of concerns about the impact on the daylight and sunlight of residents of Meru and Hemmingway Closes, which it confirms are 'Major adverse (significant)':

"The development of tall buildings, such as the Proposed Development, often results in incidences of significant adverse effects of daylight and sunlight amenity to some properties, which are often unavoidable. In addition, contextual factors such as the orientation and proximity of neighbouring properties indicate that some significant impacts are to be expected from a redevelopment of the site.

It should be noted that the site is unusually clear and uncharacteristic of an inner urban environment, resulting in high baseline levels of daylight. As such, breaches of the BRE criteria for daylight are to be expected when a meaningful redevelopment of the site comes forward."

We have carried out our assessment and find that the scheme will highly damaging to people who live in the WKT&GO neighbourhood area and to the environment as a whole. We ask our local councillors to stand with us against this development.

## 1 IMPACT ON RESIDENTS

The Environmental Impact Assessment does not provide sufficient assessment of the impact of the development on residents who live near to the development. Specifically we refer to the impact on residents of the WKT&GO neighbourhood area, including

- Meru Close
- Hemmingway Close
- Cressfield Close
- Kiln Place
- Oak Village

An assessment has been made of the impact on daylight and sunlight on these homes. This shows the impact of the proposed development on daylighting within these homes to be as follows

1-14 Meru Close	‘Major adverse (significant)’
18-31 Meru Close	‘Moderate- Major adverse (significant)’
7-18 Hemmingway Close	‘Moderate- Major adverse (significant)’
32-35 Hemmingway Close	‘Moderate- Major adverse (significant)’
36-42 Hemmingway Close	‘Major adverse (significant)’

Although the applicant suggests that this is acceptable, ie. “unavoidable” and “to be expected”, we do not agree.

We would also highlight that no assessment has been made of other environmental and psychological factors that should be considered to evaluate the impact on the residents of these homes, such as:

- Increased noise due to reflection of sound created by trains by buildings immediately opposite homes in Meru Close and Hemmingway Close (the ‘canyon effect’). See site section below showing the relationship between the new buildings.
- Glare from windows of the new buildings. This evaluated in respect of train and car drivers, but not residents.
- Psychological and mental health impacts due to the overbearing presence of buildings looming over existing homes and loss of privacy. There are no views of the development from Meru Close and Hemmingway Close to enable this to be visualised and judged by planners and the Planning Committee. The only views of this part of the development are taken from a long distance, eg. from the end of Lamble Street. This discriminates against residents of these areas.

The building adjacent to Meru Close and Hemmingway Close are blocks K and L, which have a maximum height of 94m and 85m respectively. The buildings are 27m away from some the homes in Meru Close, which are around 13m high. The new buildings are therefore at least 7 times as high as the existing buildings, which is an unacceptable disjuncture in scale. The developer avoids presenting any views which show this.

## 2 IMPACT ON KENTISH TOWN CITY FARM

The Environmental Impact Assessment fails to acknowledge the sensitivity of the farm as a 'receptor'. Key beneficial aspects of the Farm that are missing are:

- Mental health value for residents seeking relaxation and respite
- Play value for children
- Educational value for all age groups
- Community health services
- Biodiversity value of the site
- Community cohesion

The Assessment does not acknowledge the importance of the Farm to the local community in providing a peaceful and secluded green space. The Farm is a place where young children can play and be involved in activities which enable them to learn about nature and ecology, and how to care for it. It is an important community asset which has been developed by and for the community and has been enjoyed over the past 50 years (see the following website)

<http://40years.ktcityfarm.org.uk>

The history and importance of the Farm is not accounted for in the Environmental Impact Assessment.

The Environmental Impact Assessment does not deal properly with impacts on Kentish Town City Farm. It does not evaluate the impact of loss of privacy on people working in and visiting the farm, or the physical and psychological effects of the proposed development on the farm site as a whole and the harm to its biodiversity.

The Farm's Trustees are objecting to the application because the scale, height, and overall bulk of the residential towers adjacent to the farm are "completely out of scale with the surroundings and will be detrimental to the immediate neighbourhood".

The Environmental Assessment states that the 19 storey tower (Plot J) is 50m away from the farm, which is incorrect. The tower is 30m from the riding arena, which is often used for programmes run for vulnerable young adults and children as well as disabled participants. This poses a problem for the Farm in providing adequate safeguarding to those that are taking part in these programmes who may well be affected by the fact of being overlooked.

## 3 IMPACT ON NATURE AND BIODIVERSITY

We are concerned about the ecological impacts of the development on the WKT&GO neighbourhood area, specifically

- Negative impact on habitat networks in our area caused by high density development on the Murphy Site, both during and after construction, specifically those of birds and bats.

- Negative impact of the development on the biodiversity within Kentish Town City Farm, which has a healthy population of house sparrows and insects including butterflies.
- Loss of scrub and trees along the railway lines that currently provide green corridors for wildlife. The proposed enhancement of existing rail-side green corridors must be established in the early stages of the development; this should be a condition of any planning permission and subject to a Section 106 agreement that is actively monitored by the Council.
- We do not think that the proposals include sufficient biodiverse wildlife corridors throughout the site and think that it is imperative that the area allocated for this is increased.
- The proposed bridge link over the railway to the Regis Road site is located in an area protected by the Kentish Town Neighbourhood Plan as a green corridor. This proposed bridge link should be relocated to allow the trees and planting on the railway embankment to remain undisturbed.
- There is not enough green space within the development for the people living in the new homes.

The works are also detrimental to the existing biodiversity on the site and adjoining areas.

#### 4 IMPACT ON THE CLIMATE

The Environmental Impact Assessment plays down the significance of the proposal in terms of the Carbon Dioxide/ Greenhouse Gas (CO<sub>2</sub>e) emissions, saying:

“Overall, the Proposed Development contributes a small amount to GHG emissions and will employ commensurate mitigation measures to ensure policy compliance and minimise its contribution to climate change where possible to ensure that likely significant effects associated with the Proposed Development itself are avoided.”

This is a denial of the figures presented in the Whole Life Carbon Assessment which shows that the embodied carbon of the construction of the development is completely unacceptable- nearly **2 million tonnes of CO<sub>2</sub>e**, more than twice the CO<sub>2</sub>e emissions resulting from all activity in the borough of Camden in a year (968,000 tonnes CO<sub>2</sub>e).

Estimated WLC emissions (Assessment 1)	
N.B. This forms the WLC baseline for the development. The results from Assessment 1 below are automatically po	
	Module A1-A5
TOTAL kg CO <sub>2</sub> e	1,972,216,129 kg CO <sub>2</sub> e
TOTAL kg CO <sub>2</sub> e/m <sup>2</sup> GIA	12025.7081

Estimated WLC emissions (Assessment 2)	
N.B. The results from Assessment 2 below are automatically populated here.	
	Module A1-A5
TOTAL kg CO <sub>2</sub> e	1,871,403,831 kg CO <sub>2</sub> e
TOTAL kg CO <sub>2</sub> e/m <sup>2</sup> GIA	11410.99897

The above extracts from the Whole Life Carbon Assessment show the embodied carbon of the construction will be between 1.87m tonnes and 1.97m tonnes CO<sub>2</sub>e

The scheme is the opposite of what we would hope to see in the age of Climate and Ecological Emergency. In order to reduce harmful CO<sub>2</sub>e emissions, buildings should be built with low carbon construction materials and technologies.

With this scheme we see the same ‘business as usual’ construction model, based on a very high quantities of reinforced concrete and steel. It is as if the developer is completely oblivious to the threat that the Climate Emergency presents to the whole of humanity. At this very basic level the Environmental Impact Assessment is completely inadequate: there is, for example, no consideration about how the embodied carbon of the construction can be reduced.

The targets for carbon emissions resulting from heating, cooling and lighting are also inadequate. These buildings will need retrofitting as soon as they are built.

The development will cause unacceptable harm to the environment due to increasing risk to the climate and should not be acceptable to London Borough of Camden.

## 5 IMPLICATIONS OF POPULATION DENSITY

As part of our response to the recent Site Allocations Local Plan consultation, we noted that the population in and immediately adjacent to our area is proposed to increase by around 9,000. This is compared to the population of the WKT&GO neighbourhood area of around 16,000. We asked, where is the 60% increase of social infrastructure to cater for this increase? This is not in evidence in the Murphy Site development proposals which will put more pressure on existing infrastructure.

An example of this is increased use of roadways and pavements on Gordon House Road and Mansfield Road, which will cause unacceptable congestion. The developer has not made any effort to address this through the intelligent siting of new housing. Access for new housing should be to Highgate Road which is better able to cater for increased vehicular servicing.

Another example is the lack of green amenity space for residents who will need to use existing green spaces which are already over-used, eg. Hampstead Heath.

## 6 FAILURE TO MITIGATE HARM

The Design Evolution section of Environmental Impact Assessment that is meant to show how the scheme has been changed to mitigate harm. However, it is that the developer has been extremely selective in the harms that are addressed. These are reduced to:

- Views from and to the Heath
- Biodiversity
- Daylight and Sunlight

They do not deal in any detail with the harms outlined in this objection. Specifically:

- Impact on the climate due to CO<sub>2</sub>e emissions
- Impact on neighbouring areas in any way other than Daylight and Sunlight, eg. Health and Wellbeing
- Impact on biodiversity in neighbouring sites
- Impact on existing social infrastructure, including Kentish Town City Farm.

This Design Evolution section makes clear the intransigence of the developer and demonstrates unwillingness to reduce the scale of the development for the sake of mitigating harms.

### ***Scheme Iteration 05***



Design as of January 2021

### ***Scheme Iteration 06***



Design as of June 2021 (as submitted).

Regards the changes to the design between Iteration 05 and Iteration 06, the document says that the “Residential heights in the north of the site reduced across Plots K, L and M”. However any height reduction is imperceptible in the images provided.