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Dear David

## RE: Murphy's Yard, Kentish Town withdrawn scheme under 2021/3225/P

Thank you for your letter dated 18/05/2022, which formally withdrew the above planning application for comprehensive redevelopment of the Murphy's Yard site. Naturally this is not where we wanted to be after successfully adopting a planning framework for the site and following several years of pre-application discussions but what was submitted fell significantly short of our expectations.

We welcome that Folgate Estates remain committed to redeveloping Murphy's Yard, and the local planning authority has common aspirations to deliver affordable housing, new homes, workspace (including affordable) and local employment opportunities, open space, community spaces, local benefits (including for groups and organisations) and new and improved infrastructure and connections. The principle of comprehensive redevelopment is supported and we look forward to working with Folgate Estates on revised proposals. There is a huge level of interest in this site locally which as you know is covered by two neighbourhood plans. More successful and genuine engagement with local groups and residents will be essential in arriving at an acceptable scheme. To help this process provided below is a summary of our main concerns with the proposals.

Despite the quantum of development proposed, the flexibility of uses sought, the poor mix of homes and the ambitious scale and massing of buildings the financial appraisal submitted with the scheme shows that it is undeliverable and there is no guarantee of the heavily caveated and unacceptably low amount of affordable housing and very poor level of public benefits proposed being delivered.

Our key concerns about the submitted scheme include:

• This is an industrial site with very poor connections and links to the surrounding neighbourhoods. It needs significant investment to improve access to Kentish Town Station, Regis Road/Gospel Oak, Gordon House Road and Highgate Road via Sanderson Close and Greenwood Place if it is to function as a successful place, integrate into its surroundings and manage the impact on local roads safely. This includes the Heath Line through to Kentish Town Station and the link across to Regis Road for which no feasibility

work has been done. There is no commitment to funding these essential improvements via the S106 which are necessary to make the development acceptable. Linked to this we remain of the view that the development must incorporate the car wash site and the 02 forum (with a view to retaining the Forum but providing it with improved servicing facilities which sit more comfortably alongside a new neighbourhood). The inclusion of the car wash site is essential to providing a fitting gateway to Kentish Town Station and the masterplan needs to work with not around the 02 Forum which is an important cultural asset.

- The proposals would place more strain on nearby transport facilities including the Gospel Oak Overground Station, Kentish Town Underground Station, Kentish Town Thameslink Station and local bus networks. A significant number of residents and workers would be introduced, and no mitigation is proposed.
- The housing offer is poor and more needs to be delivered in the first phase. We support the commitment to providing at least 750 homes, but the proposal falls short of our 50% target for affordable homes and doesn't commit to meeting the fast track of 39%. To compound matters the mix of private homes is poor and this hasn't translated into a good mix of affordable homes which lacks a decent amount of family sized homes.
- The commitment to social infrastructure is inadequate given the number of new homes proposed and you need to do much more work to understand and address local needs and reach out to young people. There is a lack of community space, leisure facilities, affordable workspace and a poor employment and training package. There is also a failure to address impacts on important local uses such as the City Farm, and there is a lack of detail on who the healthcare space is for. We have been clear from the outset that we wouldn't support speculative healthcare space.
- Generally the proposals were not sufficiently ambitious in tackling climate change or adapting to its effects as set out in the framework which expects developments to be exemplary in terms of energy strategy, circular economy and whole life carbon impacts. The proposals had a lack of open space, soft landscaping and greenery and a result isn't sufficient climate change resilient or biodiverse. There is an inadequate amount of public green space to meet the needs of residents in the new homes and within this a lack of play space.

In combination the parameters, design code and development specification allow a scale, massing and quantum of development which is significantly beyond the illustrative scheme that was consulted on during the pre-application stage, which in itself was challenging as recognised by the Design Review Panel. As a result it has an unacceptable impact on important views from Hampstead Heath and on the Kentish Town viewing corridor, heritage assets and on daylight to nearby existing homes to the west. We are also concerned about the quality and safety of the environment at street level and for the amenity of new residents due to gaps between buildings, plot coverage, open space, lack of ground floor activation, conflict between servicing and pedestrians, and streets widths. In any new

scheme we would expect more details in the parameter plans and more controls in the design code and engagement from here on in needs to be on a maximum scheme not an "illustrative scheme".

These impacts are symptomatic of trying to accommodate too much floorspace onto the site. The proposed mix and quantity of uses needs to be revisited not only to lessen these impacts but to improve viability and deliver the necessary public benefits. Industrial land policy has changed during the planning for this scheme, with the requirement now to ensure no let loss of existing industrial floorspace rather than an amount equivalent to a 65% plot ratio. At the same time delivery of new homes has increased in importance as affordability has worsened and new supply has decreased. There is also an opportunity to work with public healthcare providers to deliver a fit for purpose healthcare building. As a result we recommend the mix of uses is reviewed and the amount of commercial space reduced. We are also concerned that the submitted scheme was seeking too much flexibility in land uses. We would expect the new scheme to be much clearer on the minimum and maximum land uses in each plot.

I hope you find the above helpful, although it is not an exhaustive assessment of the entire submission. As the local planning authority, we are committed to working with you and support the principle of redeveloping Murphy's Yard to be an exemplary regeneration project. I look forward to working with you and the community collaboratively to achieving this goal.

Yours sincerely,

Daniel Pope

Chief Planning Officer