

From: [REDACTED]
Sent: 13 November 2019 01:51
To: [REDACTED]
Cc: 100avenueroadCMP [REDACTED]
Subject: Subject : 100 Avenue Road - 2017/6638/CMP - Objection and comments regarding reducing preventable noxious emissions

TO: [REDACTED]
CC: [REDACTED]
SUBJECT : 100 Avenue Road - 2017/6638/CMP
Dear Mr Coltrini and Essential Living,

I object to the new CMP for the following reasons:

These proposals are a significant departure and increase on what was approved and discussed before for the previous CMP in late 2018 and so need to be fully considered afresh by the members of the Planning Committee.

The new CMP proposals reduce the daily number of HGVs using the preferred means of adjacent site access via the A41 pit-lane from 32 to 28, and increase the number of HGVs going onto the site and passing just a few metres from all the public park users from 21 to 25. Moreover 11 of these 25 HGVs going onto the site will now be the maximum size massive 54ft articulated HGVs.

So, not only will there be more sources of noise and pollution much closer to the members of public using the park than if more HGVs had continued to use the A41 pit lane, 11 of these will emit even more pollution than the original 34ft HGVs foreseen in the previously-approved CMP. The number of HGVs using the A41 pit-lane must be increased back up to the previous 32 and the number of HGVs going on-site must be reduced down to the previous 21.

In an answer to related concerns given on slide 13 of your public presentation on 30th October you incorrectly state that: *"The articulated lorries will all be ULEZ compliant and therefore there would be no increase in pollution levels between a 52ft truck and a 33 ft truck."* On slide 12 you incorrectly state that: *No increase in pollution is expected, with all lorries being targeted to be ULEZ compliant".*

Both these answers are incorrect, and betray a lack of understanding of exactly how ULEZ applies to HGVs and exactly how the Euro VI emissions standard is actually defined for HGVs (as opposed to the Euro 6 emissions standard for cars).

Within the Central London ULEZ HGVs already need to meet the Euro VI standard for HGVs, and if this is not met a penalty charge of £100 per day needs to be paid to TfL. However, the Euro VI standard for trucks is graduated in proportion to the power of the engine, such that the more powerful the engine, the more noxious NOx (and other) emissions are still validly allowed. A 54ft articulated HGV will inevitably have a much more powerful engine than a 34ft HGV and therefore will definitely emit more noxious gases and particulate matter than the smaller-engined 34ft HGV, whilst still potentially being compliant with the Euro VI standard.

In the Euro VI standard the emissions limits for HC (hydrocarbons), NOx (Nitrogen oxides) and PM (Particulate Matter) are all expressed in grams per kWh, and these are as follows (reference: <https://www.dieselnet.com/standards/eu/hd.php>):
HC 0.13 (0.46) g/kWh;
NOx 0.4 (2.0) g/kWh and
PM 0.01 (0.02) g/kWh.

The figures in brackets refer to the previous, much more lax, Euro V HGV standards, where it can be seen that the Euro V standard allows 5 times more NOx to be emitted than the Euro VI standard, as well as more than 3 times as much HC and twice as much PM.

So, in clear refutation of your statement quoted earlier, there will indeed be more pollution per HGV from the 11, 54ft articulated HGVs going on-site than from the 34ft HGVs that were previously going on site.

Moreover, if you do not rigidly mandate (rather than simply 'target') that every HGV must meet Euro VI standards (per the Central London ULEZ), rather than Euro V standards (as per the greater London LEZ), then the levels of noxious NOx pollution will be 5 times as great.

In light of this, and for the sake of the health of the park users, rather than levy a £100 per day fine on only Euro V compliant HGVs, as TfL do in the ULEZ, you must instead completely ban them from coming on site. A £100 fine will not help those unfortunate members of the public who have to breathe the 5 times more toxic fumes that Euro V HGVs emit!

Finally you must define and enforce an anti-idling policy, such that whenever an HGV is expected to stand stationary on-site for more than a minute or so, the engine must be turned off. This must be actively monitored for every HGV and enforced by someone on site (maybe a banksman?) who keeps a close eye on the trucks as they arrive on site. Camden already tries to enforce a similar anti-idling policy elsewhere in the public realm, so this should be extended to the 100 Avenue Rd site.

Passive monitoring of levels of NOx and the other noxious fumes, with action only being taken later if levels are seen to have been exceeded is like 'shutting the stable door after the horse has bolted'. Prevention of pollution up-front by the strict measures suggested above, must be the only acceptable policy for the sake of the health of Camden residents.

Thank you in advance for seriously addressing these points.
Best regards,
Eric Peel

South Hampstead