

---

**From:** Frost, Katherine  
**Sent:** 14 January 2021 15:44  
**To:** McClue, Jonathan  
**Cc:** Berry-Khan, Gabriel  
**Subject:** RE: Murphys Yard ES scoping ref. 2020/5774/P

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

Jonathan

I have considered the Murphy's Yard EIA Scoping Report by Trium Draft December 2020. Please note the following:

*34. It is currently envisaged that the energy strategy would be electric with air source heat pumps.*

**Comment 1:** The potential for a heat pump led network solution using ground or river source should be considered over an air source heat pump solution.

#### Air Quality

*152. ...There have been no recent exceedances of the particulate matter PM10 and PM2.5 objectives at any monitoring location in Camden.*

**Comment 2:** The WHO air quality guidelines for PM10 and PM2.5 should now be considered as these have been adopted by Camden and the New London Plan which is a material consideration. As such it is expected that there have been recent exceedances for particulate matter at the site.

*154.... With the mitigation measures in place, it is expected that residual construction dust and PM10 effects would be not significant.*

**Comment 3:** Generally the approach is sound however it should be noted that it is expected that as part of the mitigation that monitoring will be required and baseline monitoring would normally be required for at least 6 months (ideally 12 months) prior to commencement, and the results used to inform interpretation of construction phase monitoring and any actions required to be taken to avoid exceedances.

*159...*

- *A quantitative assessment of the impacts of the operation of the Proposed Development on concentrations of NO2, PM10 and PM2.5 from development-generated road traffic emissions in the proposed year of opening;*
- *A quantitative assessment of concentrations of NO2, PM10 and PM2.5 that future users of the Proposed Development will be exposed to in the year of opening; and*

**Comment 4:** In line with CPG Air Quality, the application of atmospheric dispersion modelling to predicted NO2 and PM10 concentrations, both with and without the proposed development is required. Dispersion modelling shall be the carried out in accordance with Air Quality and Planning Guidance, London Councils (2007) and London Local Air Quality Management Plan

Technical Guidance 2016. Modelling should not predict improvements to future years (future vehicle emissions or future background concentrations).

### **Climate Change**

**Comment 5:** Development proposals referable to the Mayor should calculate whole life-cycle carbon emissions through a nationally recognised Whole Life-Cycle Carbon Assessment and demonstrate actions taken to reduce life-cycle carbon emissions, in line with the GLA Whole Life Carbon Guidance.

### **Materials and Waste**

399. ...*between 90% and 95% of waste materials have been recovered and re-used or recycled.*

**Comment 6:** It should be noted that the New London Plan states that waste planning authorities and industry working in collaboration to:

to meet or exceed the targets for each of the following waste and material streams:

- a) construction and demolition – 95 per cent reuse/recycling/recovery
- b) excavation – 95 per cent beneficial use<sup>16</sup>

407. ...*A Circular Economy Statement will be prepared and submitted alongside the planning application which would address waste and material for all life stages of the Proposed Development.*

**Comment 7:** Referable applications should promote circular economy outcomes and aim to be net zero-waste. A Circular Economy Statement should be submitted, to demonstrate:

- 1) how all materials arising from demolition and remediation works will be re-used and/or recycled
- 2) how the proposal's design and construction will reduce material demands and enable building materials, components and products to be disassembled and re-used at the end of their useful life
- 3) opportunities for managing as much waste as possible on site
- 4) adequate and easily accessible storage space and collection systems to support recycling and re-use
- 5) how much waste the proposal is expected to generate, and how and where the waste will be managed in accordance with the waste hierarchy
- 6) how performance will be monitored and reported.

### **Water resources, Flood Risk and Drainage**

Please note a LLFA response to follow separately.

Kind regards

Katherine

Katherine Frost  
Senior Sustainability Officer (Planning)

Telephone: [REDACTED]

