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17 September 2026

London Borough of Camden
Planning Development Management
5 Pancras Square
London N1C 4AG

By email: planning@camden.gov.uk · Scoping reference: 2026/3564/P

Dear Laura Dorbeck, Planning Case Officer,

Re: Murphy's Yard, Highgate Road, London NW5 — Representations on EIA Scoping Report (August 2026)

We write as Mortimer Terrace Nature Reserve Trustees (freehold held by Camden Community Makers CLT), which adjoins the Murphy's Yard site. The freehold was formally transferred to CCM from the London Borough of Camden on 15 July 2026, following the Council's own purchase of the site in 2022 and a community campaign dating back to 2019. The Reserve is a Grade 1 Site of Importance for Nature Conservation, is designated as a Local Green Space under Policy ES1 of the Dartmouth Park Neighbourhood Plan (Appendix 4, Part A), is protected by a Camden Woodland Tree Preservation Order covering every tree on site, and has been under continuous community management since 1987, when local residents established it under a lease from building contractor Mark Fitzpatrick.

We are not objecting to the redevelopment of Murphy's Yard in principle. We are submitting these representations because the Reserve sits immediately adjacent to a site proposed for buildings of up to 16 storeys, and we do not consider the current Scoping Report tests the effects on the Reserve with sufficient rigour.

1. Apparent error in the site boundary mapping

Paragraph 18 of the Scoping Report states that "a portion of the SINC encroaches into the northern boundary of the site," illustrated in Figure 4 (Environmental Context Map). We believe this is a mapping error and ask that it be corrected or properly justified before the Environmental Statement relies on it.

A live railway corridor (the London Overground Suffragette line, Gospel Oak to Barking Riverside) runs between the Reserve and the application site, which makes any genuine encroachment of the Reserve's

titled land into the site boundary physically implausible. We hold historic title evidence, including a 1986 conveyance from British Railways Board to Mark Fitzpatrick and Sons Limited of land at Mortimer Terrace, Parliament Hill Fields — the same Mark Fitzpatrick whose company subsequently granted the lease under which the Reserve was established in 1987 — showing the relevant land as a narrow strip running alongside the railway, not extending into what is now the application site. We consider it far more likely that Figure 4 reflects an imprecise ecological SINC designation boundary, which may have been drawn broadly enough to cross the railway corridor on a schematic map without corresponding to any actual title boundary, rather than a genuine overlap.

We ask that this be verified against the precise digital SINC boundary held by Camden's ecology team or GiGL (Greenspace Information for Greater London), rather than relied upon from the schematic Figure 4 alone, and corrected in the Environmental Statement if, as we believe, no genuine overlap exists. Separately, if the applicant considers any part of the Reserve's titled land does fall within the application boundary, we would expect to have received formal notice of this application as a landowner under Article 13 of the Town and Country Planning (Development Management Procedure) (England) Order 2015; we have not received any such notice, which we consider further supports our view that no genuine overlap exists.

2. Hampstead Heath Woods SSSI and functionally linked land

Natural England's own response to this scoping consultation, dated 3 September 2026, states that the development "is within or may impact on" Hampstead Heath Woods Site of Special Scientific Interest (SSSI) — a nationally designated site under the Wildlife and Countryside Act 1981. Natural England's advice explicitly requires the Environmental Statement to assess effects on "functionally linked land outside the designated site," including land that provides habitat for mobile species that are interest features of the SSSI, such as birds and bats, and land linked hydrologically or geomorphologically to the site.

We consider the Reserve is precisely this kind of functionally linked land. It forms part of the habitat network connecting Hampstead Heath to Kentish Town City Farm and the Gospel Oak Railsides via the Camden Nature Corridor, supporting the movement of mobile species, including bats and birds, between the SSSI and these neighbouring sites. We ask that the Scoping Opinion require the Environmental Statement to assess the Reserve specifically in this capacity, as functionally linked land supporting the SSSI's interest features, and not solely as a standalone local designation.

3. Daylight and sunlight test points

We note that the Reserve has been included as a named receptor in the applicant's Building Research Establishment-based Daylight, Sunlight and Overshadowing assessment (Chapter 12) — for which we are grateful, given a neighbouring receptor, Kentish Town City Farm, does not appear to have been included at all. However, we ask that this assessment test light levels at multiple points across the Reserve, not only at its boundary, given the pond and nectar garden are both seasonally sensitive to changes in available light and are not necessarily located at the point nearest the application site.

4. Wind microclimate — planted and habitat areas, not only paths

We welcome the applicant's commitment to CFD wind microclimate modelling using the Lawson LDDC criteria across a 500m radius, which we understand will capture the Reserve. As currently framed, however, this assessment appears to cover public paths and open spaces rather than the more sheltered, densely planted habitat areas within reserves and gardens, which are particularly sensitive to increased wind exposure and consequent desiccation. We ask that the Reserve's planted and habitat areas specifically be added as test points within this assessment, not only the paths that cross it.

5. Local microclimate — temperature and rainfall effects on the Reserve

We understand the Scoping Report's Climate Change chapter states that existing receptors within the surrounding area will not be assessed for climate resilience, with only the Proposed Development's own buildings, occupants and ecology considered. This means neither the potential for the completed scheme to raise local ambient temperatures, nor any change to local rainfall and wind-driven precipitation patterns caused by a cluster of buildings up to 16 storeys, is currently scoped to be tested against neighbouring receptors — including this Reserve, its trees, pond and nectar garden, and the wider Camden Nature Corridor, which the applicant's own Scoping Report identifies the site as capable of helping to link. We ask that the Scoping Opinion require the Environmental Statement to assess local microclimate temperature and rainfall pattern changes caused by the Proposed Development itself, and their effect on adjoining ecological receptors including this Reserve, rather than treating climate change solely as a matter for the development itself to adapt to.

6. Construction and operational edge-effects on the Reserve and neighbouring SINCs

The Reserve, together with the other Sites of Importance for Nature Conservation bordering this development, is at direct risk of 'edge-effects' arising from both the construction process and the completed scheme's height, density and materials. These effects degrade habitat quality, displace sensitive species, affect breeding success and population numbers, and disrupt the ecological connectivity between the Reserve, Kentish Town City Farm, the Gospel Oak Railsides, and the wider Camden Nature Corridor. We ask that the Environmental Statement assess each of the following specifically in relation to the Reserve, rather than in general terms alone.

Noise pollution during construction

- Reduced reproductive success where high decibel levels drown out bird song and amphibian mating calls, disrupting courtship and breeding.
- Disruption to predator-prey dynamics, where the sound of an approaching predator is masked by construction noise, leaving prey species more vulnerable.
- Elevated stress hormones in wildlife, with associated effects on immune function and heart rate.

Vibration and earth movement

- Soil disruption affecting the density and structural integrity of burrows, tunnels and cavities relied on by foxes, ground-nesting birds, bees and other burrowing species.
- Root system damage destabilising mature trees, a particular concern given the additional stress trees are already under from drought and other climate pressures.

- Ground movement risk from shifting strata, rock or clay layers altering local groundwater tables — redirecting water in ways that could drain existing wet habitat within the Reserve while causing surface flooding on land that is currently dry.

Proposed building height and density

- Wind tunnelling between and around tall buildings, altering wind direction and intensity in ways that add stress and physical damage to trees already vulnerable to increased summer drought, and interfering with insect and bird flight paths, alongside increased collision risk with tall glazed structures.
- Overshadowing effects on primary producers and pioneer plant species, with knock-on 'domino' effects through the food chain as species composition shifts among both plants and the animals that depend on them.
- Urban heat island intensification, as concrete and glass structures absorb, retain and radiate heat, creating localised microclimates that raise habitat temperatures — an increasing concern as summers intensify.
- Isolation risk, where high-density structures fragment the existing patchwork of habitats, disrupting SINC-to-SINC connectivity, open mosaic habitat, and the green corridors this development itself is presented as helping to link.

We ask that the Environmental Statement test each of these mechanisms specifically against the Reserve and its habitats, alongside the other SINC's bordering the site, rather than relying on the general construction-phase and townscape assessments proposed elsewhere in the Scoping Report. We note that Camden's own Public Health Strategist, in a consultee response on this application dated 24 August 2026, advised that the health chapter of the Environmental Statement should specifically examine "access to green and blue spaces, biodiversity, and urban cooling," and how the benefits and burdens of climate adaptation are distributed across communities. We consider the Reserve's role in urban cooling and habitat connectivity for the surrounding area falls squarely within this advice, and ask that the Health and Ecology chapters be read together on this point.

7. A binding climate-resilience standard in the Design Code

The Reserve's own management is increasingly guided by climate resilience principles — planting choices, water management and habitat design that anticipate a warmer, more variable local climate rather than simply react to it. Given the Reserve's direct boundary with the site, the climate performance of the buildings and public realm proposed at Murphy's Yard is not an abstract policy question for us but a practical one, bearing directly on whether our own resilience planning for the Reserve can succeed.

Camden's adopted Local Plan (2017) contains Policy CC1 (Climate change mitigation) and Policy CC2 (Adapting to climate change), supported by the Council's "Energy efficiency and adaptation" Camden Planning Guidance (adopted January 2021), and the emerging Local Plan proposes further policies on circular economy and waste reduction and on sustainable design and construction certification. We have not, however, been able to identify any adopted Camden policy or guidance requiring a site's Design Code itself — as distinct from a standalone Sustainability Statement or Circular Economy Statement — to embed binding standards for climate resilience, including glazing and solar performance. Given that individual plots

on this site will be sold to third-party developers over what the applicant's own documents describe as a build-out to 2042, and that those future developers will design against the Design Code and Parameter Plans rather than against supporting statements submitted at outline stage, we ask that Camden's Scoping Opinion require climate resilience — including maximum glazing ratios, solar heat gain and reflectivity limits, consistent with Camden's emerging Policy CC8 (Overheating and cooling) — to be written directly into the binding Design Code itself, rather than left to standalone supporting statements that will not bind the majority of the site's eventual builders.

8. Flood risk climate change allowance

The Scoping Report states that the drainage strategy will accommodate surface water runoff up to and including the 1-in-100-year rainfall event, with an allowance of 40% for climate change. This figure appears to derive from 2008 Met Office research incorporated into 2016 Environment Agency guidance, which has since been superseded. The Environment Agency published updated peak rainfall climate change allowances on 10 May 2022, based on more granular UKCP Local (2.2km) climate modelling, replacing the earlier flat national allowance with figures specific to each management catchment. Current guidance also requires that, given the site's likely operational lifetime, the upper-end allowance be tested against both the 1% and 3.3% annual exceedance probability events for the 2070s epoch, together with a 10% urban creep allowance in sizing any sustainable drainage infrastructure.

This matters directly to the Reserve, which is immediately adjacent to the site and includes a pond that is itself sensitive to surface water inputs. We ask that the Scoping Opinion require the applicant to confirm it is using the current, catchment-specific Environment Agency allowances rather than the superseded 40% figure, and that the Flood Risk Assessment test the full range of events and epochs current guidance requires, given the multi-decade lifetime of this development and its proximity to the Reserve's own water-dependent habitats.

9. Drainage hierarchy compliance and the historic River Fleet

The Scoping Report confirms that the Fleet Sewer — the culverted, combined-sewer remnant of the historic River Fleet — crosses the central part of the site "at an unconfirmed depth," and separately confirms that two historic tributaries of the River Fleet crossed the site before culverting in the 19th century. We recognise that, as this is now a live combined sewer carrying foul as well as surface water, straightforward daylighting is not a simple or safe option, and we are not asking for this.

We do, however, ask the Scoping Opinion to address the drainage hierarchy itself. London Plan Policy SI13 places green infrastructure — rainwater harvesting, infiltration, and attenuation in features such as rain gardens and ponds — above grey, tanked attenuation. London Plan Policy SI17 separately commits development to protect and enhance London's waterways, with supporting text naming the Fleet specifically as an example of the lost-river problem it exists to address. Given the Reserve's own pond and wetland habitat depend on a stable local water table and clean surface water inputs, we have a direct interest in how this site's drainage strategy is resolved. The Scoping Report's drainage strategy currently references attenuation tanks without demonstrating that higher-hierarchy green alternatives have been properly considered and discounted. We ask that the Environmental Statement demonstrate full compliance with the SI13 hierarchy, including genuine consideration of green infrastructure-based

sustainable drainage across the site's public realm, and that it address how the scheme responds to Policy SI17, given the opportunity a landscape feature referencing the historic Fleet tributary alignment could offer both the site and the Reserve's own hydrology.

Separately, given the Scoping Report itself describes the depth of the Fleet Sewer crossing as unconfirmed, we ask that this be properly surveyed and confirmed before significant excavation, piling or attenuation infrastructure works proceed near it, given the risk to a live combined sewer and to groundwater conditions the Reserve itself depends on. We note that Historic England's Greater London Archaeological Advisory Service (GLAAS), in its own response to this scoping consultation dated 3 September 2026, has independently identified the original course of the Fleet as potentially significant for the recovery of palaeoenvironmental data, and has advised that further archaeological evaluation is required before a planning decision is taken. We consider this reinforces, from an independent statutory consultee, the need for proper survey and evaluation of the Fleet's historic course before any excavation works proceed.

We would welcome written acknowledgement of this representation and confirmation that these points will be reflected in the Council's Scoping Opinion. We are happy to discuss any of these points further, or to host a site visit to the Reserve if that would assist the case officer's assessment.

Yours sincerely,

Jeanne Pendrill MTNR Trustee

Terry Reynolds MTNR Trustee

On behalf of

Mortimer Terrace Nature Reserve Title No. NGL553590.

and Camden Community Makers CLT

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