

Mr. Patrick Marfleet
Planning Department
Camden Council

cc. Councillors Camron Arif-Adib, Sian Berry, Anna Wright

12th May 2023

Dear Mr Marfleet,

Re: Planning application 2022/5320/P, Mansfield Bowling Club site, Camden

I am writing in reference to the above planning application, and specifically, with my views on the ecological survey appended to the application. As a scientist with a 30 year career and global reputation in ecological research, as well as an amateur naturalist of considerable experience, I can say with confidence that the reported survey is totally insufficient to assess the presence of populations of threatened invertebrates, or other species, on the site. Any development that is carried out there will, without substantial additional investigation, run the risk of damaging populations of species that are nationally rare or scarce in the UK.

The ecological survey report is evidently based on a single walkover visit on 6th May 2022. The Councillors will be aware that the UK has a seasonal environment, with the appearance and activity of species varying from month to month, and in the case of invertebrates, from week to week. Many species are very restricted in their movements, but others range more widely, with the viability of populations depending on the presence of multiple patches of habitat in an area. The loss of even small green or brownfield sites can result in the loss of species from the landscape, as key staging posts or sources of emigrants to other habitat patches are removed. Given these basic ecological tenets, it is obvious that a casual visit on a single day cannot hope to make any meaningful statement about the biodiversity of the site, or its importance to the wider natural environment.

To pick one example, the ecological survey highlights the occurrence of the Nationally Scarce Jersey Tiger moth (*Euplagia quadripunctaria*) in the area, stating that it “has been recorded on multiple occasions 1km north of the site, with the most recent record from 2021”. Yet, Jersey Tiger is a species I have regularly seen on the margins of the Mansfield Bowling Club site and that is highly likely to be breeding on the site of the proposed development. I run a regular moth trap just 100m away in Laurier Road, and regularly catch substantial numbers of the adult moths there – more than 150 individuals in 2022, for example. The adults are large, brightly-coloured, distinctive, and conspicuous – they frequently fly by day, and are easy to spot – but are only on the wing from July to September. A survey in May would of course not record them. The larvae are harder to spot, but in May most of these may in fact have pupated, rendering their detection even less likely. That the ecological survey is not even aware of the presence of this species at the site is, on its own, a damning indictment of its lack of quality.

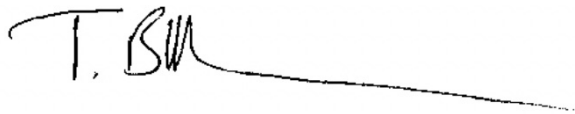
Other invertebrates in this area include Oak Hook-tip moth (*Watsonalla binaria*) – Vulnerable according to the UK Red List – and the micromoth *Prays peregrina*. This latter species is particularly interesting, as it was first described by scientists from specimens collected on Hampstead Heath in 2003, and this small area of London is where most records of the species come from. While *P. peregrina* is likely to be a non-native species introduced from another part of the world, at present we only know the species from the London area, and the Borough of Camden is the core of the species recorded global distribution. As we have no idea what the status of this species is outside of the UK, we also have no idea what the loss of patches of

habitat in this area would have on its global population. Is *P. peregrina* present on the Mansfield Bowling Club site? It seems not unlikely, as I regularly if infrequently catch the species in my moth trap on Laurier Road. The ecological survey, however, cannot even begin to say.

I have also recorded other nationally scarce species in the vicinity of the Mansfield Bowling Club site. My moth trap frequently attracts stag beetles, protected under Schedule 5 of the Wildlife and Countryside Act (1981). I have also seen Firecrest in this area, a scarce breeding bird species in the UK. Hampstead Heath and its environs are a stronghold for Hedgehog in London. The assessment of the impact of the development on these species is completely inadequate. As noted above, even small patches of habitat can be important to support metapopulations of vulnerable species in a matrix of otherwise unsuitable structures, and the removal of such patches can lead to local and regional extinction. These issues have not even been considered.

In summary, it is not possible to make any sort of evidence-based decision on the suitability of the Mansfield Bowling Club site for rare or threatened species on the basis of the limited evidence provided by the developer's ecological survey. Such species are certainly present in the locale. Given that we find ourselves in the midst of a global biodiversity crisis, that the UK is one of the most nature-depleted countries in the world, and that there undoubted socio-economic and well-being benefits to the presence of biodiversity in cities, I would hope that Camden Council and Councillors would give more attention to the potential importance of the Mansfield Bowling Club site to the ecology of the Borough of Camden. Every such site lost cuts another thread in the web of life on which we all depend.

Yours,

A handwritten signature in black ink, consisting of the letters 'T. Blackburn' in a cursive style, followed by a long horizontal line extending to the right.

Professor Tim Blackburn