Christopher Smith London Borough of Camden Development Management Town Hall, Judd Street London WC1H 9JE

28 November 2024

Dear Christopher Smith,

Re: West Kentish Town Estate Land bounded by Queens Crescent, Grafton Road, Althone Street, Rhyl Street, Weedington Road, Coity Road, Warden Road, Bassett Street and Allcroft Road London NW5 ENVIRONMENTAL IMPACT ASSESSMENT (EIA) SCOPING REPORT

Thank you for your invitation to comment on this report.

Since the original EIA submission (2022/5281/P), a proposal for a Camden Nature Corridor has been developed by a consortium of local organizations and submitted in 2024 to Camden Local Plan Consultation. It includes suggestions for biodiversity improvement in five Camden Sites of Interest for Nature Conservation (including Talacre Town Green bordering WKTE) and in three priority Camden Site Allocations, Murphy's Yard, Regis Road and WKTE itself. Subsequently, Camden Council has indicated its plans to "include reference in the new local plan to the Camden Nature Corridor as an infrastructure priority for the "Central Area" within which the three sites referred to are located ... [and] ... to include reference to the Corridor within each of the respective site allocations". Hence, as WKTE is now proposed as a part of the Camden Nature Corridor, we request that it be scoped into the ecological work of the EIA for WKTE re-development.

We suggest three ways in which this could be done. There may be others.

First, the Camden Nature Corridor has been collecting biodiversity data on WKTE (e.g. bat and nesting bird survey data) for over a year. As this ecological data will be more comprehensive than the data on which the EIA can draw, we request that it be included and used in assessment of the ecological impact of planned development. Our ecological studies in WKTE are ongoing and we would be pleased to work collaboratively with the organization(s) conducting the EIA on further surveys.

Secondly, we suggest that the EIA consider the potential impact of development on both species presently on the WKTE site *and* species encouraged and anticipated to establish there as a result of the Camden Nature Corridor, which include many <u>London Priority Species</u> for conservation. For example, with respect to bats, which are mentioned specifically in the EIA Scoping Addendum, our surveys have already identified Common Pipistrelle (*Pipistrellus pipistrellus*) as a species active in WKTE. Eight other protected London bat species are found in Hampstead Heath, the other "end" of the Nature Corridor, and the aim is to facilitate their spread, potentially into the WKTE.

Finally, the Camden Nature Corridor will need to work across three Site Allocations: WKTE, Regis Road and Murphy's Yard. The present Cumulative Scheme Map for the EIA includes Regis Road and

Murphy's Yard. In its recent Regis Road Area Guidance: Addendum to the Kentish Town Planning Framework November 2024, the Council has specifically identified the inclusion of the Camden Nature Corridor on these sites. We suggest therefore that the WKTE EIA's consideration of these two Cumulative Schemes include a specific ecological element dealing with the Nature Corridor. We also note that the plan in this Addendum for Regis Road includes opening up new, direct access to these Schemes from West Kentish Town, and that it might now be considered a Tier 2 Cumulative Scheme.

Thank you for your consideration,

With best wishes,

Prof Jeff Waage for Camden Nature Corridor

The Camden Nature Corridor is a consortium of Camden-based charities and community groups including the Heath & Hampstead Society, City of London Corporation Hampstead Heath, Mortimer Terrace Nature Reserve, Kentish Town City Farm and Friends of Talacre Town Green Horticultural Section.