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Ref: ECO3695 EcoAdd vf

101 CAMLEY STREET, KINGS CROSS, LONDON (ECO3695)

ADDITIONAL ECOLOGICAL INFORMATION TO ADDRESS CONCERNS RAISED WITHIN CONSULTATION RESPONSES

INTRODUCTION

Aspect Ecology Ltd is acting on behalf of Gateway Evolution in regard to ecological matters at the site, located at 101 Camley Street, Kings Cross in the London Borough of Camden. The site is proposed for redevelopment to provide predominantly new residential provision, along with flexible commercial space, for which a planning application has been submitted to London Borough of Camden (Ref: 2014/4385/P).

As part of the planning process, Aspect Ecology undertook ecological survey and assessment work at the site in 2014, the results of which are set out within the Aspect Ecology's report entitled '101 Camley Street, King's Cross, London: Ecological Assessment', dated June 2014, which was submitted as part of the planning application.

Subsequently, in regard to the application, consultation responses have been received including from the London Borough of Camden's sustainability officer setting out a number of further requirements in regard to ecological matters which are understood to have been initially highlighted by the London Borough of Camden's Nature Conservation Officer. Accordingly, the Nature Conservation Officer was further contacted in order to discuss the extent of additional information and consideration required.

Following consideration of the consultation response and further discussion with the Nature Conservation Officer, the following issues were raised which require further consideration.

- Background species records
- Bat Activity Survey Work
- Consideration of proposed footbridge

These matters are further considered individually below.

With the exception of the above matters, no further ecological queries or outstanding requirements appear to be highlighted within the consultation comments received relating to the planning application, and this position has been confirmed in telephone conversation with the officer.

BACKGROUND SPECIES RECORDS

The information received sets out a requirement for additional consideration of background protected species records held by the local records centre (this was not

previously included given the nature and setting of the site [as confirmed during the site survey work undertaken] comprising almost entirely built form occupied by an existing, active postal distribution centre set in central London with the only vegetation present being a small number of conifers along the southern boundary, such that the site supports negligible evident potential to support protected species).

Nonetheless, in order to address the stated requirements, Greenspace Information for Greater London (GiGL) has been further contacted in order to obtain background records of any protected, rare or notable species within the vicinity of the site. Information received from GiGL includes records of Internationally or Nationally protected species; national or London BAP priority species; red data list species; species of conservation concern in London and London Invasive Species Initiative (LISI) species.

Results and Discussion

As anticipated given the nature of the site, none of the background records of any protected, rare or notable species returned within the information provided by GiGL appear to relate to the site itself. A number of records of floral and faunal species from the wider search area were returned within the information received, which have been considered with reference to the previously reported information. In regard to flora, a number of records of notable and invasive species have been returned, particularly relating to locations consistent with Camley Street Natural Park, situated approximately 150m south west of the site, albeit as previously highlighted there is no evidence to suggest the presence of any such species at the site and as such, these records do not appear to add anything further of importance in relation to the site or current proposals.

The records obtained from the wider search area include a number of records of bats, predominantly comprising Pipistrelle species (albeit including a single record of each of Kuhl's Pipistrelle and Nathusius's Pipistrelle), with the only other identified bat species comprising Daubenton's Bat (total 3 records plus a single unconfirmed *Myotis* species) with the most recent dating from 2010. None of these appear to have specific relevance to the site. Nonetheless, further specific bat survey work and consideration is set out below in regard to the adjacent canal corridor.

Background records of other mammal species returned from the search area surrounding the site are limited to a single record of Otter and a small number (4) of records of Hedgehog. It is possible that Otter makes some use of the canal section adjacent to the site, albeit the vertical man made banks and general lack of vegetation are such that opportunities are extremely limited within the immediate vicinity of the site, whilst the territory size occupied by individual Otters is such these areas would at best represent only a tiny proportion of any Otter territory of little importance and at best the water channel would likely be used as a movement corridor. In any event, the canal itself will remain unaffected under the proposals, such that even should Otter be present it would be unlikely to be affected with the exception of potential disturbance through light spill. Further, in regard to light spill, measures and considerations in regard to this issue relating to bats would ensure that similarly Otter would not be adversely affected even in the event this species utilises the adjacent section of canal.

The habitats present within the site and adjacent areas are lacking in vegetation and accordingly, unlikely to support Hedgehog, whilst the canal corridor likely provides a substantial existing movement barrier to this species. Accordingly, the proposals are unlikely to result in any adverse effect on this species.

In terms of other faunal records, these include a number of records of bird species (none of which appear likely to be specifically related to the site), a number of records of invertebrate species and a small number of common amphibians (Palmate Newt, Common Frog and Common Toad) none of which relate to the site, whilst the proposals are unlikely to result in any adverse effects on habitats offering any specific potential to support these species.

Accordingly, following receipt and consideration of background faunal records from the site and surrounding search area, it is clear that there are no records that would suggest the presence of any protected, rare or notable species within the site, and there is nothing that would change the conclusions of the previously submitted report in regard to the potential effects of the proposals.

BAT ACTIVITY SURVEY WORK

Comments received from the London Borough of Camden's officers set out a requirement for bat activity survey work to be undertaken of the canal section located adjacent to the site, in particular in consideration of the proposed footbridge.

Accordingly, in order to address the stated requirements in this regard, specific bat activity survey work of the adjacent canal section was undertaken during September 2014.

Survey Methodology

The section of canal situated adjacent to the site was subject to bat activity survey work, comprising specific evening and pre-dawn survey work in September 2014 in order to address the highlighted requirement for such work to be undertaken by the London Borough of Camden's Nature Conservation Officer. Given the focussed and linear nature of the available suitable habitat (offsite canal corridor) and relatively short length of the relevant section of canal, bat activity survey work comprised stationary counts from 2 separate vantage points along the canal (see Plan 3695/BAT1). The survey work was carried out on the dates and weather conditions set out in Table 1 below.

Table 1: Details of weather conditions and timings of bat survey visits undertaken at the site during September 2014.

Survey Date	Survey Type	Temp.	Wind	Sunset/Sunrise Time	Cloud Cover
9 Sept 2014	Dusk	18°C	Light Air (Beaufort 1)	19.30	5%
10 Sept 2014	Dawn	14°C	Light Air (Beaufort 1)	06:30	5%

During the surveys, two surveyors were present, positioned at the locations shown at Plan 3695/BAT1 along the canal towpath using hand-held electronic bat detectors (Wildlife Acoustics EchoMeter 3/Anabat SD2 detectors, which were used to record the output in order to cover the section of the canal situated immediately adjacent to the site, along with the adjacent sections. The evening (dusk) survey commenced at sunset and continued for 2 hours, whilst the morning (dawn) survey commenced 2 hours prior to sunrise, continuing until after sunrise.

Results and Discussion

The results of the bat activity survey work undertaken are summarised at Plan 3695/BAT1. During the survey work undertaken, a very small number of bat passes and activity was recorded along the canal, with only a single species (Common Pipistrelle *Pipistrellus pipistrellus*) recorded along the canal corridor.

Indeed, the section of canal situated immediately adjacent to the site (and where the proposed footbridge is to be located) was recorded to be extremely little-used by bats (surveyor location 1), with a total of only 8 brief passes by individual Common Pipistrelle bats recorded over the course of the entire survey period (totalling 4 hours, hence only 2 brief passes per hour on average) indicating (as anticipated) that this section is little-used by bats.

Slightly greater (although still low) levels of use were recorded within the section of canal situated east of the site (surveyor location 2), beyond the Camley Street road bridge over the canal, including occasional bouts of foraging activity and circling of individual bats over the short section of canal situated between the road and railway bridges. Activity within this section was noted to be limited to small numbers (no more than a single bat noted at any one time) of Common Pipistrelle. No other bat species were recorded at either location at any time during the survey work.

During the survey work, it was noted that considerable lighting is present within the vicinity of the canal, including in particular along Camley Street, which spills onto the canal corridor (e.g. see Plan 3695/BAT1), likely contributing to the extremely limited use by bats along with the heavily developed surroundings. Further, it appears likely that the (slightly) raised activity levels noted over the short section of canal located beyond the Camley Street bridge (and therefore removed from the site itself) are facilitated by the shelter (and likely light-shielding) provided by the existing bridges, along with vegetation along the inaccessible southern bank in this short section.

It is highlighted that, during the survey work undertaken only a single species (Common Pipistrelle Bat) was recorded, which is noted to be common in urban areas and less sensitive to light levels than other bat species. This position appears to accord generally with the level of background records returned for the surrounding search area, with the vast majority of bat records comprising Pipistrelle species (see above).

Given the low levels of bat usage recorded (limited to a single, common species), combined with the background records obtained, it appears unlikely that the section of canal corridor adjacent to the site forms an important corridor for any rarer (or more light-sensitive) bat species, albeit it appears that (very small numbers of) individual Common Pipistrelle make some minor use of the canal for commuting and/or foraging. This species remains common and widespread, including within urban areas and is less susceptible to effects by light spill than other species (indeed it is noted that Common Pipistrelles are reportedly able to cope with relatively high light levels (of up to 14 lux) (Fure, 2006))[1] and known to utilise lights as a foraging focus for insects attracted to lights (BCT & ILE, 2009[2])). Nonetheless, in order to minimise any potential to affect this group (along with any other nocturnal or crepuscular wildlife potentially using the canal, such as Otter) recommendations in regard to new lighting within the vicinity of the canal are set out within the previously submitted report (in particular the use of new lighting associated with the canal corridor should be directed away from the water channel itself and contained within the towpath and associated public areas with dark areas maintained over the water channel and associated vegetation for the benefit of bats and other nocturnal/crepuscular wildlife where possible). Accordingly (with the exception of the proposed footbridge, which is discussed below) on this basis, the conclusions of the previously submitted report appear to remain appropriate in regard to this group and no further consideration is considered necessary.

[1] Fure A. (2006) “Bats and Lighting”. The London Naturalist, 85
[2] BCT & ILE (2008) “Bats and Lighting in the UK”

CONSIDERATION OF PROPOSED FOOTBRIDGE

Finally, the consultation comments received from the London Borough of Camden set out a requirement for further consideration in regard to the impact of the proposed footbridge over the canal. The proposals incorporate the construction of a new footbridge across the canal, connecting the proposed new development at 101 Camley Street with the opposite development at 103 Camley Street, which was understood to have been added to the proposals shortly prior to the submission of the planning application, following discussions with the London Borough of Camden and associated parties, including the GLA.

It is understood that the developer will provide the footings and landing point for the bridge within the current site (red line boundary), whilst construction and design of the bridge structure itself will be the responsibility of the London Borough of Camden and accordingly, detailed designs and construction timetable remain to be finalised at the appropriate stage following receipt of any planning permission.

Nonetheless, it is relevant to consider the potential for the bridge to affect wildlife using the canal corridor, with particular relevance to bats.

The bridge is proposed to span across the canal from a new footing created within the site boundary (and therefore set back from the canal, within an existing hardstanding area) over the canal and associated towpath along the northern embankment, to the existing development (under construction) at 103 Camley Street. Accordingly, the footbridge would be clear span over the canal itself and it is understood that the route of the footbridge itself would not affect the small number of existing offsite trees present, associated with the private moorings present adjacent to the site. Accordingly, the proposed footbridge (subject to suitable measures to prevent run-off or pollution of the canal in line with those previously highlighted for other areas of the site) would not be anticipated to impact directly on the water channel or any associated bankside vegetation (which in any event is extremely limited in the vicinity of the site).

Given the nature of the proposed footbridge, spanning the canal corridor, it is appropriate to consider whether it has the potential to act as a physical barrier to faunal movement along the canal. As set out above, effectively the bridge will be clear-span across the canal and associated banks and accordingly, is unlikely to hinder ground level movement of fauna. Further, it is noted that the bridge would be anticipated to be constructed at a similar height to the nearby Camley Street road bridge and mainline railway bridge over the canal (whilst being considerably smaller in structure) such that it is unlikely to provide any greater barrier to flight movement (e.g. by bats) along the canal corridor than these bridges (with indeed the above bat survey results indicating that far from forming a barrier to bat use, the habitats enclosed by the existing bridges represent the greatest use by bats, likely due to the increased shelter and shading caused).

Any potential disturbance to faunal species (in particular bats, but also including species such as Otter that may utilise the canal corridor) would therefore likely be limited to potential disturbance through light spill. It is understood that, in line with the proposed ground level pedestrian routes and linkages associated with the proposals (as set out within the previously submitted information) and the requirements of other disciplines (e.g. Camden Crime Prevention Officer) lighting will be required to the footbridge and accordingly, it is relevant to consider the potential effects of lighting the bridge on ecological receptors. On the basis of the survey work undertaken, it is clear that the existing section of canal is already subject to considerable light spill, whilst faunal activity (including in particular use by bats) is extremely limited (with the only bat species recorded during the survey work in the

form of Common Pipistrelle which is known to be less sensitive to levels of lighting). However, in order to further prevent any adverse effects of the proposed footbridge on the canal corridor, it is recommended that suitable measures be incorporated into the bridge design to prevent light spill into the canal corridor. Such measures should be readily available within any design and could include features such as: use of low level, directional lighting within the bridge, such as ground level lights or downlighting within any handrails to limit lighting to the walked area of the bridge; and solid sides to the bridge structure to contain lighting within the walked area. Such measures would need to be incorporated into the final design of the bridge at the detailed design stage (understood to be the responsibility of the London Borough of Camden) and accordingly, would be anticipated to be worked up following granting of any planning permission for the overall proposals. Nonetheless (particularly given the extremely limited use of the canal corridor by susceptible species), it is anticipated that these requirements could suitably be ensured through an appropriately worded planning condition or obligation if required.

Subject to the inclusion of the above measures, including in particular the inclusion of suitable lighting considerations within the detailed bridge design to prevent light spill into the canal corridor, on the basis of the survey and assessment work undertaken the construction of the proposed footbridge appears unlikely to result in any adverse effects on any known ecological receptor or faunal species present.

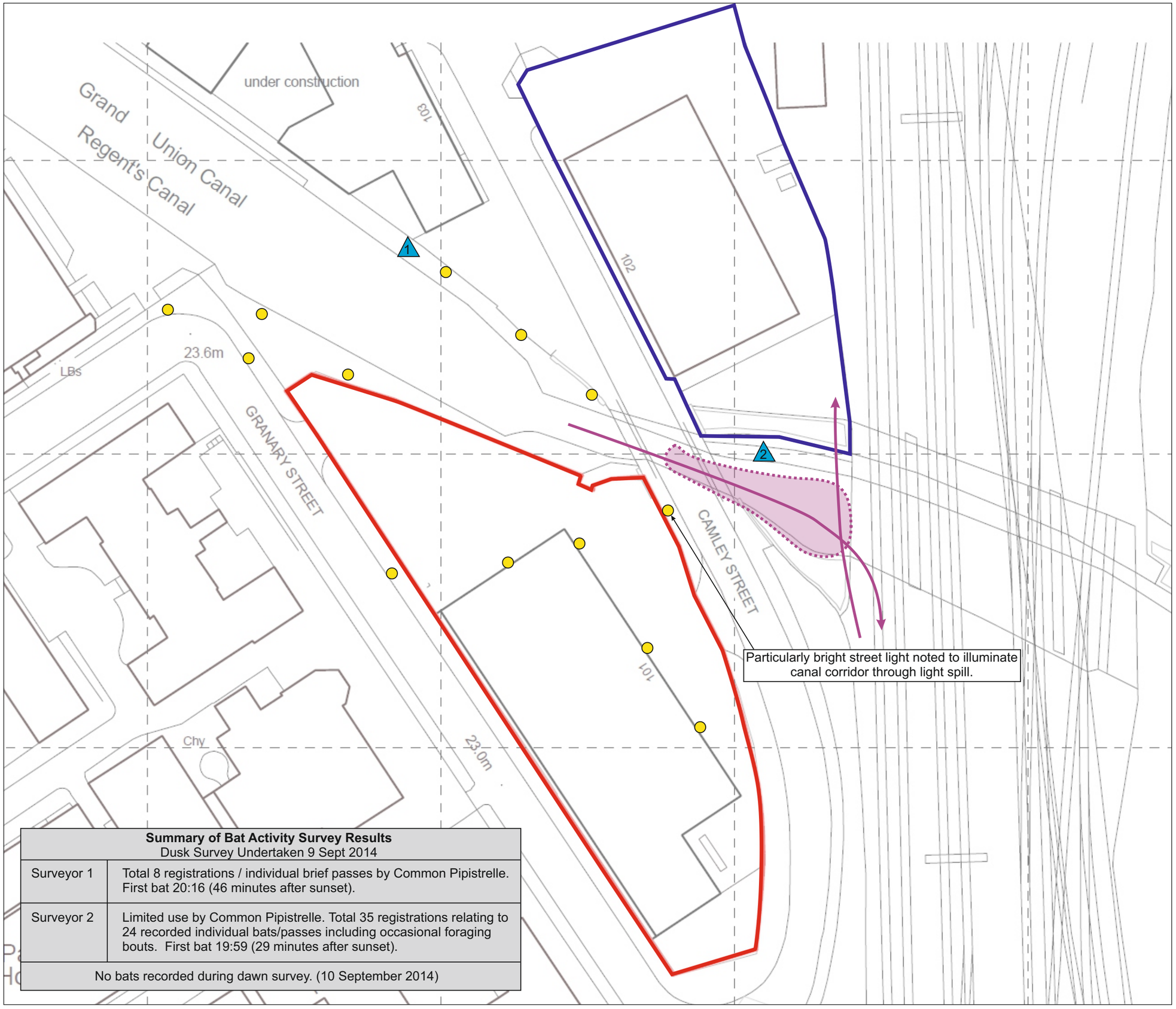
SUMMARY AND CONCLUSION

The above note provides further information and consideration in regard to a number of ecological matters in order to address comments raised within consultation responses received, relating to planning application 2014/4385/P. The above matters were also further discussed with the London Borough of Camden's Nature Conservation Officer during August 2014, following which (and subject to the above considerations) it is understood that the information provided addresses the outstanding concerns highlighted in relation to the current proposals, whilst appropriate ecological mitigation and measures can be suitably secured through appropriately worded planning conditions.

Accordingly, on the basis of the previously submitted information, along with the above considerations there appear to be no over-riding ecological constraints to the proposed development of the site.

Colin Lee
Associate Director

September 2014



Summary of Bat Activity Survey Results Dusk Survey Undertaken 9 Sept 2014	
Surveyor 1	Total 8 registrations / individual brief passes by Common Pipistrelle. First bat 20:16 (46 minutes after sunset).
Surveyor 2	Limited use by Common Pipistrelle. Total 35 registrations relating to 24 recorded individual bats/passes including occasional foraging bouts. First bat 19:59 (29 minutes after sunset).
No bats recorded during dawn survey. (10 September 2014)	

KEY:

- 101 CAMLEY STREET SITE BOUNDARY
- 102 CAMELY STREET BOUNDARY
- SURVEYOR LOCATION
- BAT COMMUTING / FORAGING PASS BY COMMON PIPISTRELLE BAT
- OCCASIONAL LOW LEVELS OF FORAGING /CIRCLING BY INDIVIDUAL COMMON PIPISTRELLE BAT
- EXISTING LIGHTING

101 CAMLEY STREET, LONDON — PROJECT

BAT SURVEY RESULTS — TITLE

3695/BAT1 — DRAWING NO.

\- — REV.

SEPTEMBER 2014 — DATE

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