

Dean Bradley House
52 Horseferry Road
London SW1P 2AF
Tel: 020 7261 0447
Fax: 020 7633 0811
enquiries@wildlondon.org.uk
www.wildlondon.org.uk



Josleen Chug
Principal Planning Officer
Regeneration and Planning, Culture and Environment
London Borough of Camden
5 Pancras Square
London N1C 4AG

19th February 2016

Dear Ms. Chug,

**CAMLEY BRIDGE, Camley Street and Wharf Road Viaduct, London N1C
Application Number: 2016/0288/P**

Thank you for giving London Wildlife Trust ('the Trust') the opportunity to comment on the above application.

The Trust, as managers of Camley Street Natural Park (on behalf of the London Borough of Camden) has long been aware of this proposal; the northern end of the Park is from where the bridge crosses the Regent's Canal to the Wharf Road viaduct. We recognise that these are Reserved Matters following the granting of Outline Planning Permission in 2006 for the King's Cross Central development (2004/2307/P).

Planning history

Our preference has always been for any development impact of King's Cross Central - including the above bridge - to avoid any adverse impacts on Camley Street Natural Park (CSNP) or the biodiversity of the Canal. We registered our objections to the proposal to the 2004 application. Nevertheless, we are mindful that following the granting of planning permission our efforts have been to ensure that any impacts are effectively mitigated and/or compensated. This is echoed in the objectives in some of the conditions applied to the permission.

Paragraph 1 of Part 2, Section S of the Section 106 Agreement states that:

"Prior to procuring any detailed design in relation to BR3 [the bridge] the Developer shall use reasonable endeavours to agree a design brief for BR3 with the Council and London Wildlife Trust. The design brief shall have due regard to design options for:

- (a) a lightweight, slender structure; and*
- (b) a 'green' bridge."*

Paragraph 2 of that same section further states that:

"The Developer shall ensure that the detailed design for BR3 shall as far as reasonably practicable:

- (a) go through the northern end of [Camley Street Natural Park (CSNP)];*
- (b) have due regard to the nature conservation interests, community value and security of CSNP which may be affected by such detailed design including lighting;*
- (c) have due regard to the opportunities to accommodate biodiversity features within or beneath the bridge structures; and*
- (d) have due regard to the opportunities to accommodate storage for conservation equipment and toilet facilities within the western bridge abutment.*

Protecting **London's wildlife** for the future

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We have been subsequently consulted by the applicants, and their design team, to help ensure the bridge minimises the impact of the bridge on the Park, its security, and our ability to manage it as a popular and high quality nature reserve. The bridge's design and use also needs to take account of our plans to replace the Park's existing facilities with a new visitor centre. This has involved discussions over the past 2-3 years as the designs have been refined.

As it stands the Trust has the following comments to make on the bridge.

Impacts to SINC habitat

The bridge impacts two Sites of Metropolitan Importance for Nature Conservation. The Regent's Canal (site M6), and Camley Street Natural Park (M133). We have worked closely with the applicant's design team to help ensure that the adverse impacts of the bridge on both SINC's are minimised.

In respect of the Canal the impacts are minimal on the water body; a small degree of shading. However, the bridge will serve as another aerial intrusion over the canal in this part of King's Cross, and will cause some impacts through interruption of flight paths of some birds and bat species that may use the canal corridor.

On Camley Street Natural Park we recognise that the siting of the bridge will effectively remove a section of the site, reducing its area by a small but significant degree. A large number of trees and shrubs will be lost within the footprint of the bridge and the landscaping required for its construction (as recognised in Condition 9 of the approval).

Nevertheless, effort has been made to ensure that this is minimal as possible within the constraints of bridge incline, loading and support, and there will be some limited mitigation by planting of the bridge embankment as it rises from its western entrance. Previous options have been explored with the Trust.

Design of the bridge

Notwithstanding the bridge's landtake of CSNP, we welcome the commitment to ensure that the bridge has otherwise minimal impact on the ecology of both SINC's, as well as an efficient use of materials. Our main concern is that opportunities have been sought to include features beneficial to biodiversity; this is largely planting along the ramparts, as part mitigation for vegetation loss, but also bird and bat boxes. The Trust has provided advice and comments on the planting palette, to ensure that this is ecologically relevant to the nature reserve and manageable in the longer-term.

Lighting

Lighting on the ramp and bridge is to be integrated into the handrail, and will be operational during the darker opening hours. Hopefully this reduces its impacts on the ecology of CSNP (especially nocturnal species such as bats and moths). We recommend that a condition is placed to ensure that no further lighting is installed and that strict opening times are maintained so that the nature reserve is not subject to unacceptable light levels and disturbance during night.

Future management of the bridge

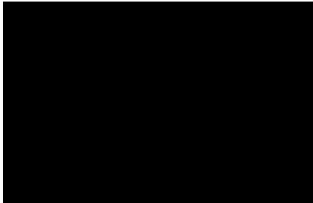
Our main concern has always been the use and on-going management of the bridge and the possible impacts on the nature reserve, through lighting, disturbance and security. We have raised points on the bridge's railings – and the need to maintain a balance between security for CSNP and aesthetic considerations. At present the design still makes it possible for users to vault the railings and enter the nature reserve without going through the formal entrance on Camley Street. Whilst our management of CSNP and – we hope – the management of the bridge will encourage responsible behaviour to respect the nature reserve, it's not clear how breaches of this can be effectively curtailed (from the bridge).

We acknowledge the proposal that the bridge (and ramp) will only be open during daylight hours (stated between 06.00 and 21.00). In order to manage this, two sets of gates are proposed at both the Wharf Road Viaduct entrance, and at the base of the ramp, on Camley Street. It is critical that the bridge is closed to the public during darkness to minimise impacts on the nature reserve, and the Trust's ability to manage it as a tranquil area. We also recommend that proposals are sought to enable further restrictions on access can be made at times of high visitor use – and that a condition is put in place to enable this to be implemented.

Conclusion

Given the impacts of the proposal to two Sites of Metropolitan Importance for Nature Conservation, the bridge needs to demonstrate how it can minimise its impacts and compensate for irreversible damage. In our opinion the application has demonstrated a commitment to reduce this to a minimum notwithstanding the direct landtake of Camley Street Natural Park. The key concern is the on-going management of the bridge and ensuring that means to close the bridge can be secured to prevent significant disturbance to the nature reserve at certain times.

If you wish for clarification on any of the above points, please don't hesitate to contact me.



c.c. Jo Mould, Regional Development Manager (North)

Appendix 1: Relevant policy context

The application is pertinent to a number of policies (our emphasis is added).

National Planning Policy Framework (2015)

Paragraph 118 (selected bullets):

*When determining planning applications, local planning authorities should aim to conserve and enhance biodiversity by applying the following principles:
opportunities to **incorporate biodiversity in and around developments** should be encouraged;*

The London Plan (2011, 2015)

Policy 7.19 *Biodiversity and Access to nature* (selected bullets):

C: Development proposals should:

*a **wherever possible, make a positive contribution to the protection, enhancement, creation and management of biodiversity***

*b prioritise assisting in achieving **targets in biodiversity action plans (BAPs)** set out in Table 7.3 and/or improve access to nature in areas deficient in accessible wildlife sites*

D: On Sites of Importance for Nature Conservation development proposals should:

*b give strong protection to sites of **metropolitan importance for nature conservation (SMIs)**.*

These are sites jointly identified by the Mayor and boroughs as having strategic nature conservation importance

E: When considering proposals that would affect directly, indirectly or cumulatively a site of recognised nature conservation interest, the following hierarchy will apply:

*1 **avoid adverse impact** to the biodiversity interest*

*2 **minimize impact and seek mitigation***

*3 **only in exceptional cases where the benefits of the proposal clearly outweigh the biodiversity impacts, seek appropriate compensation.***

Camden Core Strategy (2010)

CS15: *Protecting and improving our parks and open spaces and encouraging biodiversity:*

The Council will protect and improve sites of nature conservation and biodiversity, in particular habitats and biodiversity identified in the Camden and London Biodiversity Plans in the borough by:

d) designating existing nature conservation sites;

e) protecting other green areas with nature conservation value, including gardens, where possible;

f) seeking to improve opportunities to experience nature, in particular in South and West Hampstead, Kentish Town and central London, where such opportunities are lacking;

g) expecting the provision of new or enhanced habitat, where possible, including through biodiverse green or brown roofs and green walls;

h) identifying habitat corridors and securing biodiversity improvements along gaps in habitat corridors;

i) working with The Royal Parks, the London Wildlife Trust, friends of parks groups and local nature conservation groups to protect and improve open spaces and nature conservation in Camden;

j) protecting trees and promoting the provision of new trees and vegetation, including additional street trees.