# 178B ROYAL COLLEGE STREET & ARCHES 73,74,75 RANDOLPH STREET, CAMDEN, LONDON

Bat Survey Report

September 2022

Bioscan Report No. E2152R1

COMMISSIONED BY:
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# 1 INTRODUCTION AND METHODS

## 1.1 Introduction

1.1.1 Bioscan (UK) Ltd was commissioned by Jacuna Ltd in September 2022 to conduct a bat survey of built structures at 178B Royal College Street and arches 73,74,75 Randolph Street, Camden, London (Grid Reference: TQ292841).

1.1.2 Jacuna Ltd are seeking retrospective planning permission for a dark kitchen, following recent conversion of the arches units. An application for retrospective permission (ref: 2021/4163/P) was refused by London Borough of Camden via decision notice dated 26 July 2022. Five reasons for refusal were given, of which number 5 states:

"*The proposed development, in the absence of a Bat survey, would to lead to potential loss of local bat population* [sic] *and biodiversity, contrary to policiy* [sic] *A1 Manageing* [sic] *the impact of developement* [sic]*) and A3 (Biodiversity) of the London Borough of Camden Local Plan 2017*"

1.1.3 The delegated Officer's Report confirms that this reason for refusal was precipitated by anecdotal reports from local residents that bats "*were often spotted roosting within the Arches and in flight along the rear lane*" (Officer's Report para 8.1). The Officer's Report concluded that: "*Given the local knowledge of Bat population* [sic] *in the area, a Bat Survey is required to identify if any bat roosts and foraging/commuting habitats are on site, provision of new roosting, foraging and commuting opportunities, and if any sensitive lighting should be accommodated. For the reasons highlighted above the survey could not have been conditioned and therefore proposal* [sic] *would be refused on these grounds*".

1.1.4 Bioscan were instructed to survey the site to assess, as far as possible, whether there was evidence of any roosts having been lost or otherwise impacted by the works that have already taken place and for which retrospective permission is being sought, and to search for evidence of bat roosting more generally.

## 1.2 Baseline conditions

1.2.1 The railway arches have been converted into separated kitchen units which are connected by two corridors running parallel to each other. Previous to this the affected areas were empty brick arches with primarily a storage function. A number of photographs were supplied by the client showing the condition of the arches prior to the development-related works taking place. These were reviewed in order to provide an assessment of the likelihood of bats being present prior to the works, but self-evidently this cannot form a comprehensive assessment of the former position.

## 1.3 Methods

1.3.1 An inspection of the affected railway arches and other structures on the site was carried out by Bioscan on the 5th of September 2022.

1.3.2 Two surveyors attended the site equipped with a 6m sectional ladder/telescopic surveyors' ladder, an illuminated digital endoscope (Rigid Seesnake) and 10x50 Opticron binoculars to allow for a thorough evaluation of bat suitability for all aspects of the building.

1.3.3 Initially the external features of the buildings were assessed, comprising an examination of the outer walls and frontage of 178B Royal College Road for structural features potentially suitable for roosting (such as gaps in brickwork or around wall junctions, or at the eaves and soffits of roof structures) and for any evidence of bats such as wear marks, staining, feeding remains or droppings. Features identified on this initial inspection were then accessed where possible (via ladder if necessary) and subject to further inspection, including the use of an endoscope to examine any potentially suitable crevices.

1.3.4 Surveyors attended site equipped to undertake dusk emergence, bat activity and/or dawn re-emergence surveys in the event that evidence found during the daytime building inspections suggested this was merited.

## 2 RESULTS

### 2.1 178B Royal College Street

2.1.1 During the visit, a single bat dropping was found on a narrow metal ledge which is connected to the roller shutter mechanism along the external store frontage of 178B Royal College Steet (Photos 1 and 2). The dropping was located below a signage feature that would be considered highly sub-optimal for roosting and it was concluded that it is likely to have been deposited by a flying bat passing close to the building façade. The dropping has been sent for DNA analysis and the results are awaited, but it is deemed likely that it was from a common or soprano pipistrelle. The presence of the dropping indicates that bats either forage on the site, or use it for commuting purposes, but does not of itself indicate the presence of past or current roosting. It also indicates that such use continues despite the alterations made to the shopfront.


**Photo 1: Approximate location of dropping circled**

**Photo 2: Ledge feature which held dropping**

### 2.2 Arches 73, 74 and 75 Randolph Street

2.2.1 Internal inspection of arches 73, 74 and 75 confirmed that they have been lined, leaving a narrow void between the internal structure of the dark kitchen pods and

the original brickwork of the arches. This narrow void could not be fully examined albeit an appreciation of it could be gained at a number of locations via use of a ladder (Photo 3).

**Photo 3: Roof void above conjunction of internal corridors**

2.1.1 The survey confirmed that the sealed interior of the kitchen pods offered no roosting opportunities for bats. There were some small gaps around one ventilation tunnel which could allow for movement of bats in and out of the building although that is deemed very unlikely (Photo 4) and no evidence for this was present.

**Photo 4: Small gap in wall next to ventilation tunnel**

2.1.2 Notwithstanding the absence of evidence on the survey visit, previous use of the underside and walls of the brick arches by bats prior to the conversion works is theoretically possible. Unfortunately, the limitations of access meant that the loss of a bat roost in the course of conversion cannot be categorically ruled out. However, review of photographs of the arches prior to conversion confirm a recent history of use of the arches for storage, including with electric light, and the essentially cool and damp conditions they would have provide suggest that any summer use by the commoner species likely to be present in this urban locality, such as the two more common pipistrelle species, would be unlikely and that while the conditions might be better for winter roosting, better (less disturbed) options for that would likely have been taken up.

2.1.3 Externally, the outer-facing walls of the arches and other walls on the site displayed no evidence of bats. The dark crevices which were examined were either too shallow for a bat to roost in or were covered by cobwebs suggesting such features had not been in recent use.

## 3 CONCLUSIONS AND RECOMMENDATIONS

### 3.1 Legislative context

3.1.1 All species of bat in the UK and their roosts are fully protected under the Conservation of Habitats and Species Regulations 2017 (as amended) and the Wildlife and Countryside Act 1981 (as amended). In summary, the legislation makes it an offence to:

- deliberately capture, injure or kill any bat;
- damage/destroy a breeding site or resting place of a bat;
- deliberately disturb bats, in particular any disturbance which is likely to:
    - impair their ability to survive, breed/reproduce, or rear/nurture their young; or
    - hibernate or migrate; or
- to affect significantly the local distribution or abundance of any bat species.

### 3.2 Overall conclusions and recommendations

3.2.1 No evidence of any offences arising as a consequence of the conversion works, or of any impact on bats sufficient to engage with national or local planning policies on protected species and/or biodiversity, was found on the survey, albeit the elapse of time since the works occurred and the limitations of access to the underside and walls of the arches naturally mean that this cannot, of itself, robustly indicate that no such transgressions occurred. However, there are a number of reasons why, even in the absence of conclusive evidence, it is considered unlikely that any significant impact on bats has occurred at this site, as follows:

i) This is an urban Metropolitan site which immediately militates against the larger proportion of British bat species being likely to be present. The common species most adapted to urban environments, including in particular common and soprano pipistrelle, use a wide range of features for roosting and the site does not present a particular concentration of such features as against the surrounding area. Indeed, the built structures on the site and its poorly vegetated industrial character generally, offer lower potential for roosting than much of the immediately surrounding built form, which includes Victorian buildings with complex south-facing elevations and enclosed roof voids adjoining mature gardens and other higher quality foraging habitat.

ii) That said, the position of the site adjoining a rail corridor, does elevate the likelihood that the site is used in a transient capacity for commuting and potentially for some foraging, and the bat dropping found on the site further indicates that bats at least make such transitory use. This would be consistent with the anecdotal third-party reports of bats flying up and down, but does not of itself indicate the presence of a roost.

iii) On the basis that bats evidently visit the site it would be both prudent and responsible practice for the lighting on the site to be designed to minimise spill beyond the minimum required for operational reasons, and to ensure dark or darker (e.g. <1lux) areas are maintained in some areas – at least to a level consistent with previous uses prior to the recent unconsented development. For already urban-adapted populations of bat species, this should ensure that the site continues to provide the function for bats it did prior to the recent works, effectively resulting in 'no change' and ensuring compliance with relevant national and local planning policies.

iv) if enhancements are deemed necessary or appropriate to counter the fact that it cannot be conclusively determined whether some effect on bat conservation has arisen out of the recent conversion works, we would suggest the erection of one or more wall-mounted bat boxes in suitably elevated, secure and dark locations on the site, to provide a net enhancement of roosting opportunities over and above the current situation.


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