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Our ref: 550888mt22Mar18P01

Dear David,

Jack Straw's Castle – Ecological Planning Condition Response

Greengage Environmental Ltd have been asked to respond to several comments for the the proposed development at Jack Straw's Castle in the London Borough of Camden. These comments state:

- 1. The proposed impacts upon the Metropolitan SINC (M072) of Hampstead Heath are to the immediate west and adjacent to the proposed building. This currently consists of an area with several trees and extensive ivy cover which also grows up and over of the existing brick wall that forms the boundary with the neighbouring land. Although this area will not be directly developed upon, to gain access for the development it is indicated in the submitted Tree Survey Report on Drawing Appendix 3 compiled by RGS Arboricultural consultants (Dec 2016) that there will be a requirement for a 1.2 metre wide construction access area (appearing to be external of the proposed development boundary) which will also have temporary heras fencing erected to limit construction and protect the trees. This access area has not been explicitly explained if it is required or not. It should be noted that the proposed building which will align with this boundary will have a basement right up to the edge of this area. SEE PART 4 BELOW.*
- 2. Submitted Tree Survey Report compiled by RGS Arboricultural consultants (Dec 2016) recommends that the two dead cherries are removed but this may not actually be the case and is certainly not required for the development. Ivy removal as highlighted in point 1 above is to be removed from the boundary wall but exactly how much has not been identified. The ivy and other vegetation here (on at least the west side of the wall) is part of the M072 SINC. Any removal of ivy or other vegetation that forms part of the SINC should be explicitly identified and mitigated for (i.e. replaced). It is noted that the proposed hedging and planting along the eastern boundary of the development is much improved and now fits with the character of the area. However, this does not mitigate for any losses that may occur within the SINC. A detailed description on whether vegetation within the SINC will be required for removal or not to allow for access during the development must be explicitly explained and provided to the local planning authority prior to any development works being undertaken.*

The Preliminary Ecological Appraisal for this site was produced on the basis that all works would be constrained to within the red line boundary; hence, direct impacts upon the Hampstead Heath M072 SINC were not predicted. We now understand that a 1.2m access corridor will be required to enable construction. We understand this corridor, which would run through the edge of the SINC adjacent to the site, would be in the form of raised scaffolding. This which would enable retention of the wall, all trees, and the ivy coverage on the SINC side of the wall; the cherry trees would be retained, and severing of the ivy will not be required under this approach. There would be temporary minor disturbance to the area, but no long term clearance of vegetation. This approach could be secured by



condition under a Precautionary Method Statement, with works to be overseen in their initial stages by an Arboricultural and Ecological Clerk of Works (ACoW and ECoW). Erection of the scaffolding would take place outside of the nesting bird season, or, if undertaken between March and September, only following confirmation of the absence of nesting birds by an experienced ecologist.

The proposals would result in the loss of approximately 12m² of ivy coverage on the site side of the wall however, which would be carefully pruned outside of the nesting season (unless absence of nesting birds is confirmed by an ecologist prior to works commencing). An ivy trellis/wire system will be erected on the west facing façade of the building that adjoins the boundary wall, facing onto the SINC. The existing ivy growing on the wall will be encouraged to grow up this trellis to provide compensatory ivy growth for the area lost to development.

We believe this approach would help mitigate any long terms minor impacts upon the SINC and would compensate for the loss of the ivy coverage on the site side of the wall. The details could be secured by condition with compliance enforced through the provision of an ECoW watching brief at key stages during works. Overall, these actions, alongside the minor enhancements provided, in the form of bird and bat boxes, new hedging, small areas of landscaping and a living roof on the bin stores, are predicted to help achieve minor net gains in biodiversity at site.

We hope that the information contained within this letter addresses concerns raised. Should you have any further questions or comments please do not hesitate to contact us,

Yours sincerely

Morgan Taylor

Principal Consultant

For and on behalf of Greengage Environmental Ltd