



Gatwick Airport Northern Runway Project

Environmental Statement

Appendix 9.3.3: Summary of Stakeholder PEIR – Ecology

Book 5

VERSION: 1.0

DATE: JULY 2023

Application Document Ref: 5.3

PINS Reference Number: TR020005

Table of Contents

1	Introduction	1
2	Summary of Stakeholder Updated PEIR Responses for Ecology and Nature Conservation	1
3	Glossary	9

Table

Table 3.1.1: Glossary of Terms	9
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1 Introduction

1.1 General

- 1.1.1 This document forms **ES Appendix 9.3.3: Summary of Stakeholder PEIR Responses - Ecology** (Doc Ref. 5.3) of the Environmental Statement (ES) prepared on behalf of Gatwick Airport Limited (GAL). This ES appendix provides details of the stakeholder responses for ecology to the Updated Preliminary Environmental Information (PEI) that formed part of a statutory consultation on the design changes to the proposed highway improvement changes in June 2022 for the proposal to make best use of Gatwick Airport's existing runways and infrastructure (referred to within this report as 'the Project'). The Project proposes alterations to the existing northern runway which, together with the lifting of the current restrictions on its use, would enable dual runway operations. The Project includes the development of a range of infrastructure and facilities which, with the alterations to the northern runway, would enable the airport passenger and aircraft operations to increase. Further details regarding the components of the Project can be found in the **ES Chapter 5: Project Description** (Doc Ref. 5.1).
- 1.1.2 This document provides the summary of stakeholder updated PEI responses for nature and conservation for the Project.

2 Summary of Stakeholder Updated PEIR Responses for Ecology and Nature Conservation

Consultee	Date	Details	How / where taken into account in ES
Salford and Sidlow Parish Council	18 July 2022	We note that much work is in progress and we await reports on procedures to minimize ecological damage, both short-term and long-term, from this proposed development.	Noted. The ES includes details of the mitigation measures designed into the Project at Section 9.8 of ES Chapter 9: Ecology and Nature Conservation (Doc Ref. 5.1).
Salford and Sidlow Parish Council	18 July 2022	We welcome the design changes within the Highway proposals to increase natural light onto rivers and water courses to benefit the local environmental habitat.	Noted
Tandridge District Council	22 July 2022	We support the approach GAL are taking to setup a Biodiversity Working Group comprising stakeholders such as the Wildlife Trusts, Natural England and other interest groups (paragraph 3.7.6). It is hoped that through this forum, an approach to address Biodiversity Net Gain (BNG) is achieved. We would like to remain included on discussions arising from this and how this may have the potential to affect areas and in Tandridge.	Noted.
Mole Valley District Council	25 July 2022	9.2. The areas closest to Mole Valley district are the mitigation areas of Museum Field (south east of Charlwood) and land south of Church Meadows. Museum Field is the site for a flood compensation area which will include bunding around a River Mole extension that over time, would be managed for the benefit of biodiversity. Land south of Church Meadows would be a new recreational green space on part of a current dairy farm and would include new woodland, managed grassland and scrub with an attenuation pond.	Noted. Details of the mitigation areas are provided in Section 9.8 (Chapter 9 of the ES).
Mole Valley District Council	25 July 2022	9.3. As a result of the highway improvement changes there would be a loss of mature vegetation between the A23 London Road and Riverside Garden Park.	The effects of the loss of woodland have been assessed in Section 9.9 of the ES.
Mole Valley District Council	25 July 2022	9.4. The works to the A23 London Road would result in the loss of mature trees and therefore habitat for wildlife. GAL should commit to significant re-planting and possibly construction of a natural bund, which could serve as a noise mitigation feature as well as an ecological enhancement feature.	Significant new planting is included within the Project, including along the new road alignment. There would also be new bunding around the Museum Field that has been designed to mirror that already present to the south of Brockley Wood.
Mole Valley District Council	25 July 2022	9.5. Whilst not a change over the autumn consultation, the Council continues to support the creation of an enhanced natural habitat on Museum Field as part of the River Mole flood alleviation plans.	Noted. Details of the mitigation areas are provided in Section 9.8 (Chapter 9 of the ES).

Consultee	Date	Details	How / where taken into account in ES
Mole Valley District Council	25 July 2022	9.6. The Council supports the proposed change to create a further natural green space on land south of Church Meadows.	Noted. Details of the mitigation areas are provided in Section 9.8 (Chapter 9 of the ES).
National Highways	25 July 2022	Biodiversity Net Gain (BNG) – In order for National Highways to assess the proposals in relation to BNG, GAL will need to demonstrate how the proposed BNG calculations have considered the SRN. GAL will need to demonstrate that at least a “no net loss” is achieved and consideration will need to be given to how BNG can be achieved for the amendments to the SRN in line with requirements introduced by the Environment Act 2021 and further pending secondary legislation.	The approach to BNG accords with the prevailing legislation as it relates to NSIPs at the time of submission. The approach to BNG is set out in ES Appendix 9.9.2: Biodiversity Net Gain Statement (Doc Ref. 5.3).
Crawley Borough Council	26 July 2022	The council’s overriding concern is that there is a likelihood of significant damage to ecology and landscaping around Pentagon Field and potentially the treatment works and yet there is no mitigation for nearby residents. The council would wish to comment on concept designs for the mitigation and re-landscaping proposals for Pentagon Field, and notes that these have already been prepared in more detail for areas to the north of the borough.	The proposed use of Pentagon Field has changed from a decked car park to an area of spoil deposition. This has reduced the ecological impact of the proposals, particularly in the long-term, and would include the additional of native tree belts to enhance the ecology value.
Reigate and Banstead Borough Council	26 July 2022	We note that a new footpath is proposed to go down a ramp into Riverside Gardens on the Northern carriageway. Whilst we would agree that this is a useful solution to provide a safer environment for cyclists and walkers, more details of the tree loss and GIS layers (already requested) are provided so that the full impacts of the proposals can be taken into account. We also understand that in the interests of biodiversity that the route through Riverside Gardens will not be lit which would restrict the usage of the route at night, particularly in the winter months.	Noted. Full details of vegetation loss are provided and assessed in Section 9.9 (Chapter 9 of the ES).
Reigate and Banstead Borough Council	26 July 2022	The further work on the PEI reveals a worsening of the environmental impacts of the scheme as they relate to the road and Public Rights of Way Network. We are concerned that the Balcombe Bridge widening would result in significant loss of hedgerow and vegetation. This is already a sensitive location as other trees have been removed to the north of the bridge and the site is currently subject to a Forestry Commission Restocking Order. Further details are sought as to the extent of the loss. Harm would need to be minimised at the detailed design stage with replanting where possible being agreed with the highways authorities and the local planning authorities.	The loss of the vegetation to the south of the Balcombe Bridge was included in the original PEIR. However, the full extent of vegetation loss and replanting is illustrated in the ES and an assessment of effects is provided in Section 9.9 (Chapter 9 of the ES).
Reigate and Banstead Borough Council	26 July 2022	The revised PEI provides more detail on the scale of effects resulting from the highway alterations and new footpath descending from east of Longbridge Roundabout into Riverside Gardens. The land take is fairly significant at up to 13m and a significant number of mature trees and vegetation would be removed. This would impact on the relative tranquillity and visual nature of the gardens and local biodiversity. GIS layers are requested again to identify exactly which locations would be affected. It is unclear if the 13m permanent vegetation removal for the access ramp and the temporary 9m temporary removal for the works would equate to a 21m swathe being removed or if the 9m temporary works area is somewhere different in the park. The Moderate to Major Adverse effect is noted but the vegetation clearance and eventual replanting would take many years to mature which would suggest that Major Adverse would be a more likely outcome for many years. Clarity is needed as to when the works would take place, details of when and the extent of the vegetation removal and when it would be replanted and the type of planting.	The full extent of vegetation loss is illustrated in the ES (Figures 2.1-6 of ES Appendix 9.9.2: Biodiversity Net Gain Statement (Doc Ref. 5.3)).

Consultee	Date	Details	How / where taken into account in ES
Reigate and Banstead Borough Council	26 July 2022	45m of trees and vegetation are proposed to be removed from around the roundabout but trees are proposed to remain in the roundabout. We welcome the retention of mature trees within the centre of the Longbridge Roundabout to avoid opening-up views across the junction between public open space and residential/commercial properties and to reduce the dominance of traffic within this location.	The ongoing design and mitigation process for the A23 improvements has sought to ensure existing vegetation is retained where possible. The temporary loss of vegetation during construction would be largely reinstated with planting of a similar character, which would in time provide similar screening and softening of the new road infrastructure and traffic.
Reigate and Banstead Borough Council	26 July 2022	Furthermore, local habitats would need careful consideration at the design stage and the schemes would need to comply with national standards.	Noted. A full Phase 1 Habitat Survey has been carried out to identify the habitats present and is reported in ES Appendix 9.6.2: Ecology Survey Report (Doc Ref. 5.3). An assessment of the effects the Project would have on habitats is included in Section 9.9 of Chapter 9 of the ES and complies with national standards, policy and legislation.
Reigate and Banstead Borough Council	26 July 2022	We also note that following Environment Agency advice a number of enhancements to support biodiversity are being integrated into the culverted section of the River Mole including a fish pass which would be welcomed.	Noted. Full details of the enhancements to biodiversity from the rerouting of the River Mole are provided in Section 9.9 (Chapter 9 of the ES).
Reigate and Banstead Borough Council	26 July 2022	We are pleased to see that GAL are taking on board the changes on biodiversity net gain contained in the Environment Work, that the Zone of Influence has been amended and that a Biodiversity Working Group is being established to consider the proposals in more detail. We note that several concepts are being worked through including alterations at Church Meadows to accommodate a new balancing pond and the renaturing of Carpark B. Surrey Wildlife Trust would be best place to advise on the improvements being considered on the Surrey elements.	Details of the habitat creation proposed at Church Meadows and Car Park B are provided in Section 9.8 (Chapter 9 of the ES).
Reigate and Banstead Borough Council	26 July 2022	The general format of the landscape seems fine in principle except for the damage that may occur particularly from the southern pond on the tree and shaw boundary (if that survives the temporary contractors' compound, which is really not appropriate in this location). The main issues here would be the potential but undefined damage to trees, shaws, established vegetation and contours of the Conservation Area landscape and archaeology from the temporary contractors' compound, the raising or lowering of ground levels and the implied reshaping, dredging and deepening of the river. Detailed information on possible changes of levels, impacts on the trees and vegetation (including arboricultural information on the grades and condition of the trees) and before and after information on the river works. Visually the main issue will be whether the trees and mature vegetation survive and what the reshaping will entail.	The renaturalisation of the River Mole will increase local biodiversity. The intention would be to include backwaters in addition to the replacement of the current straight, canalised watercourse. Ecology impacts are evaluated within Section 9.9 (Chapter 9 of the ES).
Reigate and Banstead Borough Council	26 July 2022	Overall, no objection in principle to the landscape proposal, except the southern pond's proximity to the boundary but currently the damage is undefined. This could turn out to be objectionable in terms of the damage to trees, vegetation and landscape.	Noted. An assessment of effects from habitat losses and gains is provided in Section 9.9 (Chapter 9 of the ES).
CPRE Sussex	27 July 2022	We are deeply disappointed to see that if your proposals proceed even more land will be lost to construct extra road carriageways and bridges with impacts on public rights of way and biodiversity that are more severe than outlined in the previous consultation. More work is needed to minimise the impact.	Although the extent is greater than previous designs, the increase does not change the overall significance of effect.
CPRE Sussex	27 July 2022	Tree felling must be minimised. Your proposals themselves say some of the works are for engineering convenience and this is not really good enough. Engineers can find work-arounds to keep trees and minimise land take. The fact	Every effort has been made to minimise the extent of habitat loss as a result of the highways works. Although the extent is greater

Consultee	Date	Details	How / where taken into account in ES
		that some trees are on the highway estate is irrelevant. They are still trees that capture carbon provide important ecosystem services and habitat for biodiversity	than previous designs, the increase does not change the overall significance of effect.
Surrey County Council	27 July 2022	There remains a distinct need for clear and detailed drawings confirming the extent of proposed vegetation removals within and in proximity to the scheme boundary. The figures within the consultation document and appendices are insufficiently clear as to the extent of vegetation removals. It is acknowledged that there remains some uncertainty from GAL's perspective over vegetation removals, whilst discussions with National Highways over land take and mitigation are ongoing. Whilst Table 3.1.2 of the consultation document contains a written analysis of significant effects on landscape, townscape and visual resources compared to the PEIR, this needs to be accompanied by detailed figures showing existing and proposed vegetation.	Such figures are included in the ES (Figures 2.1-6 of Appendix 9.9.2) to ensure that the extent of vegetation removal is appropriately visualised and clear to consultees.
Sussex Wildlife Trust	27 July 2022	The consultation document acknowledges that there will be 'considerable loss of vegetation from within the highway boundary' (2.3.11) and other modifications to an existing pond, habitats within Church Meadow and habitats within the River Mole floodplain. However, overall the consultation concludes that there are no new or materially different significant effects from those set out in the Autumn 2021 consultation.	No response required.
Sussex Wildlife Trust	27 July 2022	SWT concern is that the 2021 consultation lacked detail relating to impacts on ecology or how these will be avoided, mitigated, compensated and enhanced. It is still not clear what the exact location of impacts are, what the existing quality of the habitats are or what amount will be lost or impacted. SWT therefore has no confidence in the conclusions on significant effects in the original PEIR or the comparisons in Appendix 4 of this consultation document. It is frustrating that no more ecological information is provided in this consultation, despite detailed comments being provided in Autumn 2021.	The 2021 consultation was supported by extensive ecology survey work which was used to support the impact assessment. The design of the Project has since evolved; although the extent of vegetation removal has increased, it is not considered to have changed significantly in EIA terms. The extent of loss is illustrated in the ES (Figures 2.1-2.6 of ES Appendix 9.9.2: Biodiversity Net Gain Statement (Doc Ref. 5.3).
Sussex Wildlife Trust	27 July 2022	Water Management We are concerned about the impacts that the reduction in size and removal of Flood Compensation Areas (FCA) may have on the overall ecological benefits of the proposal (section 3.6.3). Any FCA should be designed as new, naturally functioning wetland areas to benefit biodiversity. As there is currently no detail provided on habitat impacts, it is not clear if the removal of the FCA will have an impact on the amount of habitat creation proposed in the project. We ask GAL if the Environment Agency are supportive of the removal of these FCAs? SWT believes GAL should consider what nature-based enhancements could be made to the Gatwick Stream and Museum Field to provide multiple benefits, rather than just providing the bear minimum.	The FCA adjacent to the Gatwick Stream is no longer necessary. Part of the reason for the removal of this from the Project is that the carparking on Pentagon Field is no longer included. As such, the overall area of impermeable surface has decreased and the impact on ecology through loss of grassland is correspondingly less. All other FCAs will be designed to ensure they benefit ecology, taking account of issues around safeguarding.
Sussex Wildlife Trust	27 July 2022	Similarly, SWT are still concerned about the impacts of the proposal on the River Mole (section 3.6.4). As stated in our Autumn 2021 response, SWT hopes that GAL would be more ambitious in its commitments to biodiversity and plan for the diversion of the River Mole away from the airport, rather than culverting more of it. GAL should be developing long-term plans for this River to benefit biodiversity and to create more resilience to future pressures, particularly climate change.	The rerouting of the River Mole has been assessed as having a beneficial effect on biodiversity by creating a more natural channel instead of the canalised channel currently present and by creating backwaters.
Sussex Wildlife Trust	27 July 2022	Whilst SWT objects to the NRP, we would be willing to attend a Biodiversity Working Group (section 3.7.6). However, we are very concerned about the last minute nature of this proposal. For all other NSIPs SWT has worked on, stakeholder groups were set up months in advance of any statutory consultation, so that meaningful input could be given that influenced the project design, including ecological data collection. GAL must allow proper input from stakeholders before any DCO application is made.	Consultation with the BWG has been held through the autumn of 2022 and spring of 2023 to ensure input from stakeholders can be incorporated.

Consultee	Date	Details	How / where taken into account in ES
Sussex Wildlife Trust	27 July 2022	SWT is also extremely disappointed that GAL is still not committing to delivering a minimum of 10% Biodiversity Net Gain (section 3.7.4). This is clearly contrary to its own Decade of Change goal of having a 'sector leading net gain approach' and is not acceptable given the policy direction set out in the Environment Act. By contrast, the Arundel Bypass NSIP will be delivering a 10% measurable net gain in biodiversity, with an overall aspiration of delivering 24% BNG, despite the DCO application likely being submitted before the NSIP BNG regime is confirmed.	GAL have committed to ensuring that the NRP delivers BNG in line with the prevailing legislation. The approach to BNG is set out in ES Appendix 9.9.2: Biodiversity Net Gain Statement (Doc Ref. 5.3).
Sussex Wildlife Trust	27 July 2022	As stated in question one, SWT is still very concerned by the lack of detail relating to impacts on ecology. We again request that GAL clearly sets out the location, type and severity of habitat impacts, along with proposals for mitigation, compensation and enhancement. This should include the types, quality and quantity of habitats impacted both directly and indirectly. There must also be consideration of temporal impacts, particularly when it comes to habitat connectivity. Currently there is insufficient evidence to demonstrate the significance of impacts.	Areas of habitat to be lost are shown on appropriate figures (Figures 2.1-6 of Appendix 9.9.2 of the ES) and have been discussed in the BWG meetings to ensure that all parties are clear where habitat loss might occur and where the areas of habitat creation will be located.
Sussex Wildlife Trust	27 July 2022	The concept designs in this consultation show little detail and only cover small areas of habitats. SWT believes much more should be done to improve connectivity and enhance habitats both within and adjacent to the project boundary, particularly along the watercourses and hedgerows. The current proposals are piecemeal and it is not clear that they will be provided in perpetuity. This must be addressed.	A comprehensive ecology strategy for the site has been developed that includes the areas of habitat creation illustrated. This builds on the existing GAL Biodiversity Strategy and will include updating the GAL Biodiversity Action Plan to incorporate the NRP.
West Sussex County Council	27 July 2022	It is apparent that further extensive vegetation loss is proposed as part of these highway proposals. Loss would occur, not just through direct land-take required for operational footprint, but also through temporary construction works. For example, the hedgerow and mature oak trees that define the field boundary immediately north of the Sussex Border Path would be removed to accommodate the temporary construction works, resulting in the loss of an important landscape feature. It seems disproportionate that a mature, important landscape feature like this should be lost permanently for temporary works. If there is no alternative to their removal, the trees should be replaced on a 2:1 basis. Concern is raised over not just the area or extent of vegetation that would be lost, which is significant, it is the entire habitat itself that would be lost, including soils (and all other ecosystem service benefits), together with loss of connectivity at a landscape scale. This particular stretch of highway (the whole project boundary), squeezed between the Airport and Horley, is a vital east-west linear connection with the wider hedgerow / woodland network either side of it. It is not clear how all this additional vegetation loss would be compensated for, or how Biodiversity Net Gain (BNG) would be achieved, given the previous concerns raised in comments on the PEIR. Land-take must be reduced where possible, and the design of temporary works developed to try and avoid the loss of sensitive habitats. The River Mole crossings, road widening, new pedestrian and cycle links, temporary works compounds, temporary access and other works could all impact on ecology. However, it is difficult to assess potential ecological impacts without reference to ecological survey information, such as an Extended Phase 1 Habitat Survey. These revised highway scheme proposals are not accompanied by any ecological information or a suitable level of cross referencing to the original PEIR. Concern is raised that the previous ecological surveys boundary presented to stakeholders does not cover the required land-take for these proposals.	All vegetation loss will be limited where possible through the design process. Maintaining east-west connectivity will be a key objective of mitigation, in particular along the Gatwick Stream where it arrives close to the A23. Vegetation loss will be compensated for through new planting either within the road corridor, where possible, or elsewhere within the scheme. With respect to BNG, the Project as a whole includes extensive new habitat creation that will contribute to BNG. The approach to BNG is set out in ES Appendix 9.9.2: Biodiversity Net Gain Statement (Doc Ref. 5.3). Ecology surveys have covered the full extent of the boundary covered by the DCO plus any necessary buffer.
West Sussex County Council	27 July 2022	Opportunities to provide ecological enhancements should be sought. These might include reduced (or more directional) road lighting around bridges over the River Mole (to improve bat corridors), re-profiled watercourses, wildlife-friendly design of new drainage ponds, creation of wildflower meadows/road verges on subsoil/nutrient poor soil, and the provision of bat boxes and grey wagtail nest boxes/ledges beneath bridge structures.	Noted. All opportunities with respect to ecology enhancement are explored in the final design. Such opportunities will be further expanded during detailed design.

Consultee	Date	Details	How / where taken into account in ES
West Sussex County Council	27 July 2022	South Terminal Roundabout (2): A new drainage pond is envisaged as a permanent feature to the north-east of the roundabout. There may be opportunities to enhance biodiversity through the design, creation, and management of this pond.	Noted. The design of all surface water attenuation features across the Project includes ecology enhancement subject to safeguarding requirements.
West Sussex County Council	27 July 2022	North Terminal Roundabout (4): There may be opportunities to enhance biodiversity through the design, creation, and management of the proposed new drainage pond.	Noted. The design of all surface water attenuation features across the Project includes ecology enhancement subject to safeguarding requirements.
West Sussex County Council	27 July 2022	It is mentioned that there would be considerable loss of vegetation from within the highway boundary. Although it is stated that this would be replaced, there is currently no information on how and where. Opportunities to enhance biodiversity should be sought, eg the creation of wildflower meadows on subsoil/nutrient poor soil.	Noted. The location of new planting within the highway boundary will be determined during detailed design. However, extensive new habitat creation is included in the Project, as set out in the consultation material, including at Church Meadows, Car Park B etc.
West Sussex County Council	27 July 2022	A23 London Road (5): There is no mention of potential ecological impacts resulting from the proposed widening of the highway bridge over the River Mole, other than those during construction. There could be impacts due to increased shading of the watercourse and marginal vegetation, and a greater barrier to the movement of wildlife, including bats, under a wider bridge. Reference is made to a rights of way strategy, which would include a new pedestrian and cycle link between North Terminal and Longbridge Roundabout. No further details are given so it is not possible to assess any potential ecological impacts upon habitats and species.	Noted. These potential impacts relating to biodiversity are addressed in Section 9.9 (chapter 9 of the ES).
West Sussex County Council	27 July 2022	Longbridge Roundabout (6): The crossing of the River Mole would result in some loss of vegetation. This is likely to be ecologically sensitive and will require very careful consideration and design.	Noted. The assessment of the effects of vegetation loss resulting from the surface access improvements is included in Section 9.9 (Chapter 9 of the ES).
West Sussex County Council	27 July 2022	A23 Brighton Road (7): The new bridge structure crossing the River Mole is likely to be ecologically sensitive and will require very careful consideration and design.	Noted. The assessment of the effects resulting from the surface access improvements is included in Section 9.9 (Chapter 9 of the ES).
West Sussex County Council	27 July 2022	It is apparent that further extensive vegetation loss is proposed as stated in the consultation document at various points and particularly in table 3.1.2, which analyses the significant effects on landscape, townscape and visual resources compared to the PEIR. Concern is drawn for example to the M23 spur, where new significant effects that would be major adverse in the long term has been assessed. The hedgerow and mature oak trees that define the field boundary immediately north of the Sussex Border Path would also be removed to accommodate the temporary construction works, resulting in the loss of an important landscape feature. It seems completely disproportionate that a mature, important landscape feature like this should be lost permanently for temporary works, and further justification for this should be given. If there is no alternative to their removal, the trees should be replaced on a 2:1 basis. Other areas of concern for this vegetation loss include:: <ul style="list-style-type: none"> South Terminal: new significant effect that would be moderate to adverse in the long term – removing mature vegetation; A23 London Road: the Riverside Garden Park would be impacted by permanent vegetation removal at various widths: 8m, 9m and 13m in width; Longbridge Roundabout - greater extent of vegetation removal required, up to 45m width. 	<p>All vegetation loss will be limited where possible through the design process.</p> <p>Maintaining east-west connectivity will be a key objective of mitigation, in particular along the Gatwick Stream where it arrives close to the A23.</p> <p>Vegetation loss will be compensated for through new planting either within the road corridor, where possible, or elsewhere within the scheme.</p> <p>With respect to BNG, the Project as a whole includes extensive new habitat creation that will contribute to BNG. The approach to BNG is set out in ES Appendix 9.9.2: Biodiversity Net Gain Statement (Doc Ref. 5.3).</p>

Consultee	Date	Details	How / where taken into account in ES
		It is not just the area or extent of vegetation loss that is significant, it is the entire habitat itself which is lost, including soils (and all other ecosystem service benefits), together with loss of connectivity at a landscape scale. This particular stretch of highway (the whole project boundary), squeezed between the airport and Horley, is a vital east-west linear connection with the wider hedgerow / woodland network either side of it. It is not clear how all this additional vegetation loss would be compensated for, let alone BNG achieved, given the previous concerns raised in comments on the PEIR. An updated Zone of Theoretical Visibility (ZTV) showing the proposed changes to theoretical visibility caused by the new highways proposals (including the proposed noise barrier and removal of extensive vegetation along the road corridor) and the implications for visual impacts to receptors within proximity of the changes, needs to be presented to stakeholders to allow for meaningful discussions on viewpoint locations and photography undertaken by GAL.	
West Sussex County Council	27 July 2022	The crossings of the River Mole, road widening, new pedestrian and cycle links, temporary works compounds, temporary access and other works could all impact on ecology. However, it is difficult to assess potential ecological impacts without reference to ecological survey information, such as an Extended Phase 1 Habitat Survey. These revised highway scheme proposals do not appear to be accompanied by any ecological information. Referring to information provided within the Autumn 2021 consultation, the extent of the Phase 1 Habitat Survey, shown in Figure 9.6.3 does not appear to cover all of the new land-take requirements. Confirmation is also needed if the species survey covers the land requirements these proposals suggest.	Surveys have been undertaken across all of the land take necessary for the Project and are reported in ES Appendix 9.6.2: Ecology Survey Report (Doc Ref. 5.3).
West Sussex County Council	27 July 2022	Opportunities to provide ecological enhancements should be sought. These might include reduced (or more directional) road lighting around bridges over the River Mole (to improve bat corridors), re-profiled watercourses, wildlife-friendly design of new drainage ponds, creation of wildflower meadows/road verges on subsoil/nutrient poor soil, and the provision of bat boxes and grey wagtail nest boxes/ledges beneath bridge structures.	Noted. All opportunities with respect to ecology enhancement have been explored in the final design and are set out in Section 9.8 (Chapter 9 of the ES).
Wisborough Green Parish Council	27 July 2022	The inappropriateness of the highway plans presented is exemplified by the proposed significant removal of mature trees at the Longbridge roundabout, along London Road and along the side of Riverside Park. The loss of these mature trees is not supported. Replacement planting will not be an ecological enhancement, but a loss of biodiversity, carbon sequestration, natural screening and amenity. The proposal to justify this loss through offsetting the biodiversity lost to elsewhere (such as Museum Field) is not supported. This location provides no amenity or visual respite against the noise and air pollution of the A23 to the residents of Horley Riverside Estate and results in a reduction in the ecological value of the Riverside area.	Noted. Although there will be significant vegetation loss with respect to the A23 corridor, the extent of that loss will be minimised through detailed design. Any residual loss will be appropriately mitigated.
Woodland Trust	27 July 2022	We welcome the removal of the proposed Pentagon parking area which was due to be sited adjacent to Lower Picketts Wood,	Noted
Woodland Trust	27 July 2022	However we wish to seek clarity on the continued potential impacts to Horleyland Wood LWS. Previously our concerns related to the close proximity of the re-routed foul water pipeline serving Crawley Water Treatment Works adjacent to Horleyland Wood, however we note that the refined proposals alter the proposed on-site water management. We would appreciate confirmation if the refinements will affect this element of the project and therefore reduce or increase the impact on Horleyland Wood.	The foul water pipeline would be located outside of Horleyland Wood LWS and mitigation measures would be used to protect the ancient woodland LWS, as set out in Section 9.8 (chapter 9 of the ES).
Woodland Trust	27 July 2022	We continue to remain concerned about the project as outlined in our previous consultation responses.	Noted

Consultee	Date	Details	How / where taken into account in ES
Tonbridge and Malling Borough Council	Unknown	The landscape and ecological proposals seem very limited and inadequate in relation to the further intensification of the site for aviation activity, built extensions, revised highways infrastructure and parking facilities.	The approach to mitigation, compensation and enhancement is the subject of ongoing consultation with both Natural England and wider stakeholders via the Topic Working Groups. It will be further refined during the final scheme design and is fully detailed in the ES.
Tonbridge and Malling Borough Council	Unknown	Limited reference is given to ecology, and no reference is made to the forthcoming Environment Bill and the potential requirement for biodiversity net gain arising from the proposed development.	The approach to BNG is set out in ES Appendix 9.9.2: Biodiversity Net Gain Statement (Doc Ref. 5.3).

3 Glossary

3.1 Glossary of terms

Table 3.1.1: Glossary of Terms

Term	Description
BNG	Biodiversity Net Gain
BOA	Biodiversity Opportunity Areas
CBC	Crawley Borough Council
CIEEM	Chartered Institute of Ecology and Environmental Management
CoCP	Code of Construction Practice
DCO	Development Consent Order
DMP	Development Management Plan
EIA	Environmental Impact Assessment
EIASR	Environmental Impact Assessment Scoping Assessment
ES	Environmental Statement
GAL	Gatwick Airport Limited
IAQM	Institute of Air Quality Management
NERC	Natural Environment and Rural Communities Act
NPPF	National Planning Policy Framework
PEIR	Preliminary Environmental Information Report
PINS	Planning Inspectorate
SAC	Special Areas of Conservation
SNCI	Sites of Nature Conservation Importance
SPA	Special Protection Areas

Term	Description
SSSI	Site of Special Scientific Interest
SxBRC	Sussex Biodiversity Records Centre
UKFS	United Kingdom Forestry Standard