

Dear Gatwick,

The Conservators of Ashdown Forest are tasked with the care of the biggest area of open space in the South East. The Forest is 2,500ha and a mix of European lowland heathland and woodland habitats. It is an incredibly important landscape for both people and wildlife, which is heavily protected due to its heathland and associated species. These designations include Special Protection Area, Special Area of Conservation and Site of Special Scientific Interest. We are also located within the High Weald National Landscape (Area of Outstanding Natural Beauty).

Having read through your documentation, we note that a Habitat Regulations Assessment report has been compiled which references Ashdown Forest as a site being considered for potential effects.

There are four aspects of concern from the long-term implications of this proposal for Ashdown Forest:

- Increased air traffic providing additional impact on climate change, negatively impacting vulnerable habitats.
- Increased road traffic through Ashdown Forest (and the wider AONB)
- Increased air traffic and nitrogen deposition
- Increased noise

Ashdown Forest consists of some incredibly rare and important habitats. One of these is the wet heath and valley mires that support species that can only be found in a handful of other sites in the South East. These include species like Marsh Gentian (*Gentiana pneumonanthe*), Sundews (*Drosera* sp.) and Marsh Fern (*Thelypteris palustris*). We are already witnessing that a changing climate is impacting habitats and species, as areas that have historically stayed wet throughout the year are becoming drier and staying drier for longer. This in turn allows grass species to dominate, changing the vegetation structure making it less diverse, and impacting on wet heath assemblages. This is only one example of how climate change is negatively impacting vulnerable habitats and why proposals to increase air pollution from air traffic will significantly impact rare and vulnerable species. Off-setting carbon will not help these habitats, only a reduction in carbon/greenhouse gases use will have a sustainable long-term impact.

The HRA report confirms that there will be an increase in traffic through Ashdown Forest yet the methodology to measure the impact on the SAC was limited to a walkover survey on one stretch of the A22. This is not sufficient to determine the effect this will have on the whole SAC. The surveyed area only included the initial 10m from the roadside, which as is correctly stated, is not the correct vegetation assemblage for Lowland Heathland as stated in the SAC designation. The unfavoured vegetation within this 10m strip highlights the significant impact of nutrient enrichment from road traffic on soil and vegetation communities. Increased traffic will impact on the SAC, not just on the A22 but across the Forest and as more nutrients (and pollutants) wash further into the Forest, larger areas of the SAC will be affected.

The figures taken from Natural England already show that the mean average of air traffic over Ashdown Forest is on the higher end of their scale. With the proposed expansion, this is only ever going to increase, which will inevitably increase the amount of nitrogen deposition across the site. Nitrogen deposition affects vegetation communities by enriching the soils. This improves the conditions for more vigorous and undesirable plant species to outcompete the protected dwarf shrub species of the Forest. We use a mixture of grazing and mechanical methods to conserve the SAC vegetation communities, however with further soil enrichment from nitrogen deposition, management of the invasive species (Purple Moor grass, birch and pine scrub and bracken) become increasingly difficult.

Ashdown Forest is governed by the Ashdown Forest Act of 1974 which in part states: "To regulate and manage the Forest as an amenity and place of resort subject to existing rights of common and to protect those rights, to protect the forest from encroachments and to conserve it as a quiet and natural area of outstanding natural beauty". As previously stated, the proposed extension at Gatwick will result in increased road traffic and air traffic which will increase the noise and air quality problems, not just on Ashdown Forest but throughout the High Weald AONB. This impact on air quality and noise will impact on people's ability to enjoy the Forest as a quiet place of natural beauty.

To conclude, based on the evidence provided the Ashdown Forest does not support the proposal of the Gatwick Airport Northern Runway project as it will have a significant impact on the protected SPA, SAC, SSSI of Ashdown Forest and the wider AONB landscape. The methodology to survey Ashdown Forest in the HRA report was not a robust process to truly assess the significant impact, and a further proposed survey in 2038 is not sufficient mitigation against these impacts.

We would like to see further vigorous surveys undertaken on the increased road and air traffic, and how this can be mitigated against to protect the heathland habitats and maintain Ashdown Forest as a place of quiet resort, much loved and enjoyed by approximately 1.4m visitors a year.