Submission ID: 27523

Gatwick Northern Runway Project TR020005 – response at WR3

Ecology and Biodiversity

In my professional opinion as a Chartered Environmental Scientist with over 30 years of experience working in Sussex, I would say that the Project will be highly damaging to local ecosystems and should not go ahead in any form, as the biodiversity of the surrounds has already been severely compromised by many decades of direct damage, neglect and fragmentation and cannot take any more. However, should it proceed I would request that the wider ecological impact of the Airport (currently) and the addition of the Project (in future) be assessed, and required to be addressed through a Local Nature Recovery Plan for the wider landscapes around Gatwick Airport.

Following a review of the Local Impact Reports and national context, I support the request by the Gatwick Area Conservation Campaign (GACC) that the wider landscape impact of the Airport (currently) and the addition of the Project (in future) be assessed on the key habitats around the airport, and that these be improved through a Local Nature Recovery Plan for Gatwick Airport's surrounding environments.

The Policy Context

The Environment Act (2021) introduces a duty for 'responsible authorities' to produce Local Nature Recovery Strategies, setting out locations of Nature Recovery Networks (NRNs) to be recognised within planning. However, many local authorities have been slow to implement this, so at the time of writing only two have been established across South East England (West Sussex/Surrey Heathlands and Eastbourne Downs). A well-developed network of Biodiversity Opportunity Areas (BOAs) has however been recognised, together with the long established network of designated conservation sites such as Sites of Special Scientific Interest (SSSIs). Together these give a clear indication as to where the NRNs will be located once they are in place. Consequently we do not need to wait for the NRNs to be published to know where efforts must be focused to conserve our important biodiversity areas. In the context of Gatwick Airport this means paying regard to the following nearby BOAs:

- Glover's Wood and Edolph's Copse – Surrey
- River Mole (plus tributaries) - Surrey
- Gatwick Woods - West Sussex
- Ifield Brook - West Sussex
- Rusper Ridge - West Sussex

Statutory instruments such as Biodiversity Net Gain (BNG) must sit within the context of these networks to be effective. As nature does not respect planning boundaries, development plans (including this for Gatwick Airport) should pay regard to the biodiversity resources occurring beyond not just within their sites.

Therefore, Gatwick Northern Runway Project, as with any other large-scale NSIP should incorporate a comprehensive strategy to protect and enhance these vital biodiversity areas around its site boundary, especially since a significant proportion of the degradation of the surrounding environment is undoubtedly due to the manifold impacts that the airport has already had on its surrounding area.

Comments on Local Impact Reports with respect to ecology and biodiversity

I am concerned that the Applicant has not taken the wider Nature Recovery Networks into account. As a result the Project lacks adequate measures to fulfil the legal requirement intended by The Environment Act (2021).

GACC's assertion that this legal requirement has not been met is supported and elaborated by comments made by all of the surrounding Local Authorities within their Local Impact Reports (especially the Local Impact report for West Sussex (REP1-068) and the Local Impact report for Surrey (REP1-097)). Relevant comments from the Local Authorities identifying the shortcomings of the Project include the following:

1. There is a lack of a landscape-scale approach to assessing and addressing ecological impacts, and no provision of off-site compensatory habitat and BNG, all of which would be required to fulfil this legal commitment (REP1-068 and REP1-097).
2. Ecological impacts will extend beyond the project site boundary with potential impacts on bat populations, riparian habitats downstream of the airport and the spread of non-native aquatic species. Enhancements to green corridors and improved habitat connectivity (needed to mitigate impacts on bats and other wildlife) do not however currently extend beyond the airport, missing out key corridors such as the River Mole and Gatwick Stream (REP1-068 and REP1-097).
3. Disturbance and habitat severance within the airport, including the removal of woodland, trees and scrub along the A23, will adversely impact the functioning of wildlife corridors, notably bat commuting routes both within the site and the wider landscape (REP1-068 and REP1-097).
4. It is not clear from the application document how much woodland is being lost and how much is being enhanced/replanted, so maintenance of habitat connectivity across the airport and wider landscape is a serious concern (REP1-068 and REP1-097).
5. The Project will also result in very extensive losses of existing trees, shrubs and grassland, which currently provide ecological habitats as well as wildlife corridors connecting the wider landscape. The amount of loss and replacement is also not even quantified within the Environmental Statement (REP1-097).
6. Whilst the Project provides for replacement planting, there will be a long-term vegetation 'deficit', resulting in biodiversity loss for at least 15 years. As well as the adverse impact on wildlife corridors, this contradicts current biodiversity policy, which focuses on nature recovery and biodiversity net gains (REP1-097).
7. No compensation is provided for loss of two ponds. The reason given for this is due to bird strike health and safety considerations. Ponds are a HPI under the NERC Act, 2006 and therefore replacement ponds should compensate any loss of ponds off-site (REP1-068 and REP1-097).
8. As detailed in the Natural England Relevant Representation (RR-3223) there is currently insufficient information to assess potential impacts from traffic related air quality upon three nearby SSSI sites within Surrey (Titsey Woods SSSI, Westerham Woods SSSI and Mole Gap to Reigate Escarpment SAC/SSSI). They all show an increase in NOx and nitrogen deposition of over 1% of the critical load/level yet no

assessment of potential impacts to these sites have been made. Impacts on the SSSIs as a result of changes to atmospheric ammonia levels have also not been considered (REP1-097).
9. A range of on-site mitigation and compensation measures are proposed to address the ecological and arboricultural impacts. However, it is considered that these measures are both inadequate and lacking in detail. It is critically important that the
newly created habitats, whether established in compensation for habitat loss elsewhere or for the purpose of achieving BNG, continue to be managed over the long-term to maintain and enhance their biodiversity value (REP1-068).
10. The extent of loss of mature broadleaved woodland is of particular concern and additional compensation measures will be required to ensure no adverse impacts occur to broadleaved woodland habitat and bats. If, due to airport safeguarding, it is not possible to provide sufficient compensatory planting within the site, off-site woodland creation is required (REP1-068).
Therefore, for the project to be acceptable in terms of its wider ecological impacts, it should specifically include significant and measurable provision to set out and deliver a Local Nature Recovery Strategy for the areas around Gatwick Airport (both land-based and aquatic). This should enable sufficient support for biodiversity areas/ corridors that make up the component parts of the Nature Recovery Network that are present around the airport. This should also take account of former damage already caused by the airport, and make use of all available mechanisms such as BNG to enhance and create resilience in to the local ecosystem.
Therefore, I request that at the very least the biodiversity commitment within the Project must be subject to a radical review. I request the ExA to require the impact of this project, and existing airport on the ecology that surrounds the airport to be assessed and improved.