
# Gatwick Airport Northern Runway Project

## Appendix F: Response to the JLAs on Arboriculture, Landscape and Ecology

**Book 10**

**VERSION: 1.0**

**DATE: MAY 2024**

**Application Document Ref: 10.24**

**PINS Reference Number: TR020005**

1 Introduction 1

1.1 Overview 1

## Tables

Table 1. Joint Surrey Councils, Comments on Deadline 2 & Deadline 1

Table 2. Analysis of Tree Survey and Arboricultural Impact Assessment

Table 3. Joint West Sussex Councils, Review of D2 Aboricultural Documentation Submissions

Table 4. West Sussex County Council Principal Areas of Disagreement Summary Statement

# 1 Introduction

## 1.1 Overview

1.1.1 This document has been prepared to set out the Applicant's response to submissions regarding arboricultural related matters received at or before Deadline 3. Revised versions of **ES Appendix 8.10.1: Tree Survey Report and Arboricultural Impact Assessment** [REP3-037, REP3-038, REP3-039, REP3-040, REP3-041, REP3-042] and **Code of Construction Practice Annex 6 – Outline Arboricultural and Vegetation Method Statement** [REP3-022, REP3-023, REP3-024, REP3-025, REP3-026, REP3-027] were submitted at D3, incorporating additional information regarding tree and vegetation removal and protection measures. The Applicant is continuing to engage with members of the Joint Surrey Councils and Joint West Sussex Councils to provide additional information and clarify any concerns.

1.1.2 The document is divided into four tables based on submissions from the Joint Local Authorities as follows:

- Table 1. GAL's Response to Joint Surrey Councils' Comments on GAL Deadline 1 and Deadline 2 Submissions [REP3-133]
- Table 2. GAL's Response to Joint Surrey Councils' Comments on GAL Deadline 1 and 2 Submissions [REP3-133] – Analysis of Tree Survey Report and Arboricultural Impact Assessment (paragraph 54)
- Table 3. GAL's Response to Joint West Sussex Councils' Review of D2 Arboricultural Documentation Submissions [REP3-117]
- Table 4. GAL's Response to West Sussex County Council Principal Areas of Disagreement Summary Statement [REP3-151]

**Table 1. GAL's Response to Joint Surrey Councils –Surrey County Council, Mole Valley Borough Council, Reigate & Banstead Borough Council and Tandridge District Council – Comments on GAL Deadline 1 and 2 Submissions [REP3-133]**

| Joint Surrey Councils | | |
|---|---|---|
| **Comments on Deadline 2 Landscape, Townscape and Visual Resources Figures – Part 1 [REP2-006]** | | |
| **Paragraph** | **Description of concern** | **GAL's Response** |
| 33 to 39 | The ExA may want to consider requesting a set of Photoshop type images showing the views without the vegetation and tree cover that would be lost as a result of the scheme. | The Applicant engaged with Reigate and Banstead Borough Council during a meeting on 14th May 2024 to confirm the nature and scope of the requested illustrative material. Images showing vegetation removal, the new landscape scheme at implementation and the maturing planting will be prepared and submitted for Deadline 6. |
| Comments on Deadline 1 Arboricultural submissions [REP1-026 - REP1-030] | | |
| Paragraph | Description of concern | GAL's Response |
| 45 to 49 | That the survey has deviated from BS 5837 and elected to group trees that of different characteristics including species of significant age | Trees have been surveyed following the BS5837 recommendations and reported in the **Tree Survey Report and Arboricultural Impact Assessment** [REP3-037, REP3-039 and REP3-041]. Trees have been grouped where appropriate and given a single category that reflects the overall quality of the group in line with the recommendations of paragraphs 4.4.2.2 & 4.4.2.3 of BS5837: |

| | | |
|---|---|---|
| | difference potential, giving them a single quality grade. | *4.4.2.2: "Individual trees, groups of trees and woodlands should be assessed for their quality and benefits within the context of proposed development, in a transparent, understandable and systematic way. The quality of each tree or group of trees should be recorded by allocating it to one of four categories (see 4.5). The categories should be differentiated on the tree survey plan by colours (see 4.5 and Tables 1 and 2), and/or by suffixing the category adjacent to the tree identification number on the tree survey plan (e.g. 217-A, 218-C etc; see 4.4.2.1)."*<br><br>*4.4.2.3: "Trees growing as groups or woodland should be identified and assessed as such where the arboriculturist determines that this is appropriate. However, an assessment of individuals within any group should still be undertaken if there is a need to differentiate between them, e.g. in order to highlight significant variation in attributes (including physiological or structural condition)".*<br><br>This will at times group trees that have a range of ages or characteristics but as the group is being assessed as a whole this variance will be taken into account when assigning a category (A, B, C or U).<br><br>Any trees within a group that do not sit within this Category have been surveyed individually.<br><br>In line with para 4.4.2.3 of BS5837, any trees that are outside of the collective groups category when considered individually, have been identified and assessed individually if there has been a "need to differentiate between them". Trees have also been picked out and considered individually from tree groups if their characteristics and quality significantly vary from other trees within the group. The |

| | | |
|---|---|---|
| | | group has then been assessed without consideration of those trees that have been considered individually.<br><br>For example, Trees T25 & T54 sit within Groups G27 & G44 respectively but have been picked out from these groups and surveyed separately as individual trees, due to the need to differentiate these more mature trees that predate the lower quality infrastructure trees that have been planted around them.<br><br>A category is then assigned to the group, excluding any trees that have been surveyed individually. The assigned category is often higher than that of any given tree within a group, as the group holds a higher value collectively than the sum of its parts. In cases where collective value has not raised the Category of the trees within a group, the groups Category has been based around the higher value trees that sit within the group.<br><br>For example, a stand of good quality Category “A” trees with a lower value Category “B/C” understory will still be assigned Category A. Whereas a group of lower quality category “B” and “C” trees that have a singular Category “A” tree within them will have been assigned Category “B” and the Category “A” tree surveyed individually.<br><br>Group value has therefore, not been lowered based on the condition of the lowest quality trees within a group. In this way the survey is a fair and accurate appraisal of the trees on site that, if anything, overstates the quality of trees within groups.<br><br>The survey therefore has followed the recommendations of BS5837. |

| | | |
|---|---|---|
| 50 | The Applicant has in part failed to consider and appropriately grade the individual trees within a group, contrary to the narrative of Table 1 Cascade chart of BS5837, under the criteria Landscape value. | The Applicant has considered and appropriately graded the individual trees within a group, in line with the narrative of Table 1 Cascade chart of BS5837, under the criteria Landscape value.<br><br>Trees within groups have been assessed in line with BS5837 recommendations, as explained above. Groups that have been surveyed collectively in line with Paragraph 4.4.2.3 of BS5837 have been assigned a collective value based on BS5837 Table 1, subcategory 2 "Mainly landscape qualities", which states:<br><br>Category A: *"Trees, groups or woodlands of particular visual importance as Arboricultural and/or landscape features"*<br><br>Category B: *"Trees present in numbers, usually growing as groups or woodlands, such that they attract a higher collective rating than they might as individuals; or trees occurring as collectives but situated so as to make little visual contribution to the wider locality."*<br><br>Category C: *"Trees present in groups or woodlands, but without this conferring on them significantly greater collective landscape value; and/or trees offering low or only temporary/transient landscape benefits"*<br><br>These subcategories (arboricultural, landscape and cultural), have been considered when assessing both individual trees and groups. Where groups have a collective value higher than that of the individuals within the group this has been considered and a higher category assigned. |

| | | |
|---|---|---|
| | | Further assessment of individual trees within a group beyond those that have already been assessed individually would only identify those trees that are of a lower quality than the collective group and understate the importance of the trees as part of the group. |
| 51 | The survey, analysis and conclusion appear distorted as consequence of this failing to acknowledge the collective visual value and critically the ecosystem services contribution provided to the nearby residents, airport users and others along with the environment at large. The loss of the trees associated with this development, is clearly and accurately acknowledged in 8.1.6 of the report "There will be large scale tree loss across the proposed development especially within the A23/M23 road corridor." 8.1.6 continues "the impact of the tree loss is somewhat negated by the low quality of the existing highway | The tree survey has considered collective visual value when assigning trees within groups and woodlands a category in line with BS5837 recommendations. Although a specific ecosystem services assessment has not been completed, the loss of the trees has been considered as part of the Environmental Statement submitted with the application.<br><br>This has included from an ecology (**ES Chapter 9 Ecology and Nature Conservation** [APP-034]]), landscape (**ES Chapter 8 Landscape, Townscape and Visual Resources** [APP-033]), water (**ES Chapter 11 Water Environment** [APP-036]), noise (**ES Chapter 14 Noise and Vibration [APP-039]), air quality** (**ES Chapter 13 Air Quality** [APP-038]), human health (**ES Chapter 18 Health and Wellbeing** [APP-043]), and recreation (**ES Chapter 19 Agricultural Land Use and Recreation** [APP-044]) perspective. As such, the ES has considered the key aspects associated with the tree loss that would be considered within an Ecosystem Services assessment . The woodlands have been surveyed as part of the ecological assessment (**ES Appendix 9.6.2 Ecology Survey Report** [APP-125]) with the pre-development ecological value described in the Biodiversity Net Gain assessment (**ES Appendix 9.9.2 Biodiversity Net Gain Statement** [REP3-047]).<br><br>The majority of the trees along the corridor are, if considered as individuals, lower quality infrastructure trees, that were planted following construction of the airport |

| | | |
|---|---|---|
| | infrastructure trees that were planted following construction of the airport roads." This is not considered fully reflective | roads. The Tree Survey Report has often given these lower quality trees a higher category based on their collective merit within a group or woodland; however, it is still reasonable to state that the trees themselves are of a lower quality.<br>Estimated tree group removal by category, based on a worst-case assessment of the preliminary designs, are as follows;<br>• Category A: 32%<br>• Category B: 42%<br>• Category C: 25%<br>• Category U: 1% |
| 51&52 | Adequately compensating for the loss in green infrastructure and impacts thereof is dependent on the availability of suitable planting space in this same vicinity. This is critical to reconstruct the environmental, landscape and ecosystem services provided. Focusing on the numbers of trees removed versus the number of trees to be planted is flawed in its design. | While **ES Appendix 8.10.1: Tree Survey Report and Arboricultural Impact Assessment** [REP3-037, REP3-038, REP3-039, REP3-040, REP3-041, REP3-042] identifies the numerical aspect of replacing trees, the area and value related considerations of the trees, groups and woodlands have informed the landscape design of the project.<br>This is set out in **ES Appendix 8.8.1: Outline Landscape and Ecology Management Plan** [REP3-031, REP3-033, REP3-035] which sets the overarching landscape vision for the Project.<br><br>Significant effects on landscape/townscape character and visual amenity are generally confined to locations associated with highway planting loss to accommodate the surface access improvements, as described in **ES Chapter 8 Landscape, Townscape and Visual** [APP-033] . The oLEMP includes Figures 1.2.4 to 1.2.15 Surface Access Landscape Proposals and Figures 1.2.1, 1.2.2, 1.2.3 |

| | | |
|---|---|---|
| | | and 1.2.18 for replacement public open space and green infrastructure proposals. These figures show the principle of landscape design. Landscape design objectives for the Surface Access zone are included at Section 3.7 and Landscape Proposals for the zone are included at Section 4.7 of the oLEMP.<br><br>Reinstatement of scrub and tree planting will be designed in accordance with guidelines by National Highways (DMRB LD117 Landscape Design, the Manual of Contract Documents for Highways Works, Major Projects and Highways England, DMRB Asset Data Management Manual Volume 13) which would limit the extent of woodland that could be replanted adjacent to the highway, compared to the existing situation. Approximately 3.1 ha of woodland planting is currently located within a 9m buffer, defined in DMRB LD117, either side of the highway within the surface access improvements area. The DMRB LD117 prevents planting of larger/climax trees/woodland within the 9 metre buffer and any planting within this area is subject to agreement with NH.<br><br>The existing mature highway woodland and scrub planting provides a substantial green corridor for the A23 between the Gatwick Airport access roundabout and the Longbridge roundabout. The planting also provides a green buffer between the road and the urban green space of Riverside Garden Park and the buildings and infrastructure of Gatwick, filtering views of traffic, and although it is not usable, amenity green space. Trees and vegetation to be removed will be replaced within the proposed road corridor with native tree and scrub species, where feasible and with wide grass verges. Two new areas of urban green space will be created at Car Park B on the eastern end of Riverside Garden Park. A further area of open space will be created north of Longbridge roundabout, adjacent to Church Meadows. |

| | | |
|---|---|---|
| | | These spaces will include extensive native woodland, scrub and grassland communities which offer usable amenity space for the public, diverse ecological habitats and linkages between urban and rural spaces. The addition of these areas of replacement open space will in time provide greater value, in terms of ecosystem services, than the removed highway planting. The value of the landscape/townscape within the Project site and its context and the visual amenity enjoyed by the local community and visitors to the area has been recognised during the design development. |
| 53 | It is considered critical to reformulate the planting requirements moving from a numerical approach but to one based upon the values lost and required. | The approach used for the AIA is explained in section 3 of **ES Appendix 8.10.1: Tree Survey Report and Arboricultural Impact Assessment** [REP3-037, REP3-038, REP3-039, REP3-040, REP3-041, REP3-042]. The report and survey were carried out in accordance with the requirements set out in BS 5837:2012 “Trees in Relation to Design, Demolition and Construction – Recommendations”. This is the appropriate assessment methodology because it identifies individual trees, groups and woodland and records their amenity value and quality within the context of the Project.<br><br>Further, Crawley Local Plan Policy CH6 also requires a numerical assessment.<br><br>While **ES Appendix 8.10.1: Tree Survey Report and Arboricultural Impact Assessment** [REP3-037, REP3-038, REP3-039, REP3-040, REP3-041, REP3-042] identifies the numerical aspect of replacing trees, area and value related considerations have informed the landscape design of the project.<br><br>The approach taken in the AIA, has informed the **ES Appendix 8.8.1: Outline Landscape and Ecology Management Plan** [REP3-031, REP3-033, REP3-035] |

| | | |
|---|---|---|
| | | which sets the overarching landscape vision for the Project.The key objectives of the oLEMP are:<br>• Landscape Integration to provide an appropriate setting for the new developments within the airport, responding to adjacent urban and rural land uses and the existing character of the airport.<br>• Retention of green infrastructure assets wherever possible. Integration with and expansion of the existing green infrastructure network within and around the airport.<br>• Enhancing, restoring and reintroducing characteristic landscape elements which have been lost or degraded.<br>Landscape design objectives for the Surface Access zone are included at Section 3.7 and Landscape Proposals for the zone are included at Section 4.7 of the oLEMP._Trees and vegetation to be removed will be replaced within the proposed road corridor with native tree and scrub species, where feasible. Two new areas of urban green space will be created at Car Park B on the eastern end of Riverside Garden Park. A further area of open space will be created north of Longbridge roundabout, adjacent to Church Meadows. These spaces will include extensive native woodland planting. |

**Table 2. GAL's Response to Joint Surrey Councils – Comments on GAL Deadline 1 and 2 Submissions [REP3-133] – Analysis of Tree Survey Report and Arboricultural Impact Assessment (paragraph 54)**

| Document reference | Subject | Text | Description of concern | Implications | GAL's Response |
|---|---|---|---|---|---|
| Appendix 8.10.1 – Tree Survey Report and Arboricultural Impact Assessment - Part 1 REP1-026 | Executive summary | It provides details of surveyed trees with the area of the proposed development in accordance with the categories of the BS5837:2012 standard. | BS 5837 is primarily focused on the visual value of trees, woodlands and hedges, unlike the Assessment. | Approach fails to suitably determine and account for the monetary and ecosystem services impacts. | BS5837 is primarily focused on Quality of surveyed trees with visual value only mentioned in subcategory 2.<br><br>The survey reported within **ES Appendix 8.10.1: Tree Survey Report and Arboricultural Impact Assessment** [REP3-037, REP3-038, REP3-039, REP3-040, REP3-041, REP3-042], has been carried out in accordance with BS5837 which does not require the monetary or ecological services impact to be evaluated.<br><br>Although a specific ecosystem services assessment has not been completed, the loss of the trees has been considered as part of the Environmental Statement submitted with the application. This has |

| | | | | | |
|---|---|---|---|---|---|
| | | | | | included from an ecology(**ES Chapter 9 Ecology and Nature Conservation** [APP-034]]), landscape (**ES Chapter 8 Landscape, Townscape and Visual Resources** [APP-033]), water (**ES Chapter 11 Water Environment** [APP-036]), noise (**ES Chapter 14 Noise and Vibration [APP-039]), air quality** (**ES Chapter 13 Air Quality** [APP-038]), human health (**ES Chapter 18 Health and Wellbeing** [APP-043]), and recreation (**ES Chapter 19 Agricultural Land Use and Recreation** [APP-044] ) perspective. As such, the assessment has considered the key aspects associated with the tree loss that would be considered within an Ecosystem Services assessment have been accounted for within the application. |
| Appendix 8.10.1 – Tree Survey Report | Survey data capture | It should be noted that individual tree entries were often | As illustrated in data entry T30(1 Betula pendula, 1 Quercus | This crude approach to data capture and tree quality appraisal | The arborist undertaking the tree surveys within **ES Appendix 8.10.1: Tree Survey Report and** |

| | | | | | |
|---|---|---|---|---|---|
| and Arboricultural Impact Assessment - Part 1 REP1-026 Para 4.2.3 | | used to denote a group of trees that have almost identical features but that are not growing in a close cohesive group. See Tree Survey Plans in Appendix F for further detail. | rubra, 6 Fraxinus angustifolia, Silver Birch, Red Oak, Narrow leaved Ash) the grouping of a number of individual trees under a single heading means a single quality grade is being applied in this case. This approach seems to deviate from the recommendations of BS 5837, including the ability to accurately and record the necessary values and grades of the tree stock present. In this example the trees in question despite their botanical differences and characteristics | prevents accurate assessment and appraisal of the arboricultural/landscape impacts of the scheme. | **Arboricultural Impact Assessment** [REP3-022, REP3-023, REP3-024, REP3-025, REP3-026, REP3-027] , has used professional judgement when grouping trees, which is in accordance with BS5837.<br><br>The quality of individual trees within entry T30 is considered to be the same. Trees have all been given the same 'B' category whether surveyed individually or together. There are no category A trees within this group.<br><br>There is, therefore, no downgrading of trees in terms of their quality or potential impact due to removal. |

| | | | | | |
|---|---|---|---|---|---|
| | | | are given the remaining estimated age as + 20 and a grade of B2 | | |
| Appendix 8.10.1 – Tree Survey Report and Arboricultural Impact Assessment - Part 3 REP1-028 Para 4.3.3 | Survey findings | The BS5837 quality of the surveyed entries is broken down in the table below: Table 2: Count of Tree Entries by Category (Airport) | The accuracy of the overall survey findings, conclusions and presented form and levels of mitigation. | The accuracy of the overall survey findings, conclusion and compensation are compromised by the grouping of trees under a single entry on remaining contribution in years and quality grade, that are less than homogenous in nature | Within **ES Appendix 8.10.1: Tree Survey Report and Arboricultural Impact Assessment** [REP3-022, REP3-023, REP3-024, REP3-025, REP3-026, REP3-027] trees have only been grouped into a single entry if their category is the same, in line with BS5837.<br><br>Any trees within a group that do not sit within this Category have been surveyed individually. |
| Appendix 8.10.1 – Tree Survey Report and Arboricultural Impact Assessment - | Tree Protection Orders | Trees covered by a TPO are protected under the Town and Country Planning Act 1990 (Trees Regulation 2012). The local authority | Does the Local Planning authority retain the authority to refuse pruning works where considered inappropriate and damaging to the | | The dDCO does not propose to disapply or amend in anyway the Town and Country Planning (Tree Preservation) (England) Regulations 2012.<br><br>**ES Appendix 5.3.2 Code of Construction Practice** [REP1-021] |

| | | | | | |
|---|---|---|---|---|---|
| Part 2 REP1-027 | | must be consulted, and permission sought for any works that may affect them. | health and amenity value of the subject tree(s)? | | sets out general methodologies and mitigation measures and **Code of Construction Practice Annex 6 – Outline Arboricultural and Vegetation Method Statement** [REP3-022, REP3-023, REP3-024, REP3-025, REP3-026, REP3-027] includes at section 5 arboricultural working practices. The LPA must approve the relevant detailed AVMS which will set out the methods used for works around the trees (including any trees covered by a TPO) and vegetation within a particular area.. |
| Appendix 8.10.1 – Tree Survey Report and Arboricultural Impact Assessment – Part 3 REP1-028 Para 7.1.6 | Tree Removal vs Tree Planting | The result of this was total estimated loss of 11,588 trees. This encompasses all surveyed trees across site, including individual trees, Groups, Woodlands and | Woodlands and groups' composition and value is dependent on other non- tree/woody shrub species such as Spindle or Butchers broom | | The estimated loss encompasses only trees within **ES Appendix 8.10.1: Tree Survey Report and Arboricultural Impact Assessment** [REP3-022, REP3-023, REP3-024, REP3-025, REP3-026, REP3-027] . |

| | | | | | |
|---|---|---|---|---|---|
| | | trees in Scrub areas. | | | The value of any woodland habitats as a whole has been considered within the **ES Appendix 9.9.2 Biodiversity Net Gain Statement** [REP3-047]. |
| Appendix 8.10.1 – Tree Survey Report and Arboricultural Impact Assessment - Part 4 Rep1-029 Para 8.1.2 | Conclusion | The needs of the local community have been respected through the minimisation of impacts on public green space and visual amenity where possible. | How have the local community been defined, has there been specific surveys and assessments undertaken in relation to property owners and the impacts of the loss of trees to the monetary value of their properties. | | The local community have been considered within **ES Chapter 8: Landscape, townscape and visual resources** [APP-033] in that the change in view experienced during construction and operation by occupiers of residential properties within close proximity to the surface access improvements, residents living on the edges of settlements around Riverside Garden Park and the local community using the urban green spaces at Riverside Garden Park and Church Meadows are described and assessed. The outcome of the assessment has informed the preliminary design of the A23 corridor landscape proposals and replacement public open space and green |

| | | | | | |
|---|---|---|---|---|---|
| | | | | | infrastructure within **ES Appendix 8.8.1: Outline Landscape and Ecology Management Plan** [REP3-031, REP3-033, REP3-035].<br><br>No significant impacts on Residential Visual Amenity have been identified as a result of the Project, as described in the **Applicants response to ExQ1, LV.1.4** [REP3-097]. |
| Appendix 8.10.1 – Tree Survey Report and Arboricultural Impact Assessment - Part 5 REP1-030<br>Para 8.1.9 | Conclusion | In summary, the Project will result in a net increase in the number of trees on site and the trees proposed for removal are mostly of inferior quality, while their replacements have the capacity to establish a higher quality, more biodiverse | Replanting suitability being based upon numbers. | Fails to achieve desired and necessary objectives | The Crawley Local Plan Policy CH6: "Tree Planting and Replacement Standards" sets out a numerical replanting policy that forms the basis of the replanting strategy. An assessment against Policy CH6 is provided in **ES Appendix 8.10.1: Tree Survey Report and Arboricultural Impact Assessment** [REP3-022, REP3-023, REP3-024, REP3-025, REP3-026, REP3-027], Appendix J: Tree |

| | | | | | |
|---|---|---|---|---|---|
| | | environment in the long term. | | | Loss and Replanting Calculation Methodology.<br><br>The ES also considers the function and value of the landscape proposals within **ES Chapter 9 Ecology and Nature Conservation** [APP-034] and **ES Chapter 8 Landscape, Townscape and Visual Resources** [APP-033]. **ES Appendix 8.8.1: Outline Landscape and Ecology Management Plan** [REP3-031, REP3-033, REP3-035] sets the overarching landscape vision for the Project.<br><br>The preliminary landscape proposals associated with the surface access improvements will reinstate, where possible, the removed vegetation. The proposals will function as green infrastructure, visual screen, ecological habitat and corridor. The contiguous and |

| | | | | | |
|---|---|---|---|---|---|
| | | | | | nearby areas of replacement open space will function as usable and attractive amenity green space, green buffers and filters between highway infrastructure and local communities and facilities, ecologically diverse habitats with connections to urban and rural wildlife networks. |

**Table 3. GAL's Response to West Sussex Joint Local Authorities – Comments on D2 Submissions – Appendix C: Review of D2 Arboricultural Documentation Submissions – Jordan Walker – County Arboriculturist, WSCC [REP3-117]**

| Joint West Sussex Councils | | |
|---|---|---|
| **Review of D2 Arboricultural Documentation Submissions** | | |
| **Section** | **Description of concern** | **GAL's Response** |
| Summary | Further clarification is required in demonstration of the need for numerous proposed tree removals where construction impacts have not been identified. The recognition and demonstration of accordance with local planning policies has not been demonstrated and is also required. | Further details of project proposals cannot be provided at this stage of the design development. Tree loss is currently based upon a worst case scenario where almost all of the vegetation within the construction area is removed. Future detailed Arboricultural and Vegetation Method Statements (AVMS) will be prepared in line with the Outline AVMS [REP3-022, REP3-024 and REP3-026] and which will re-evaluate tree loss, seeking to retain additional trees wherever possible while providing further detail on any trees that are to be removed and why they cannot be retained. |
| Summary | Impacts to Horleyland Wood (Ancient Woodland and Local Wildlife Site) have not been evaluated in adequate detail, with no specific outline protection measures being identified in mitigation of potential construction activities which could lead to the deterioration of ancient woodland. | Measures to protect areas of Ancient Woodland outside the Project boundary are set out in the **Code of Construction Practice Annex 6 – Outline Arboricultural and Vegetation Method Statement** (oAVMS) [REP3-022, REP3-023, REP3-024, REP3-025, REP3-026, REP3-027]. There are no areas of Ancient Woodland within the Project boundary.<br>The oAVMS confirms that no works will be carried out within a 15m buffer to Ancient Woodland, with the buffer zone to be fenced off with no works undertaken within it.<br>An assessment of any potential for construction impacts on Ancient Woodland is included in section 9 of **ES Chapter 9 Ecology and Nature Conservation** [APP-034]. |

| | | |
|---|---|---|
| Policy Context | Whilst the arboricultural documentation supplied addresses many of the policies stated with the LIR, there is no recognition or adherance with Local Planning Policy CH6 'Tree Planting and Replacement Standards' of the Crawley Borough Local Plan 2015 – 2030 (CBLP) | Section 7 and Appendix J of **ES Appendix 8.10.1: Tree Survey Report and Arboricultural Impact Assessment** REP3-022, REP3-023, REP3-024, REP3-025, REP3-026, REP3-027] detail how Policy CH6 has been addressed. Section 7 provides tree replacement figures based on the estimated tree removal against Policy CH6 and details on how tree removal numbers were calculated is provided in Appendix J. |
| Applicant's Approach to Assessment | The Arboricultural Impact Assessment has not identified the construction components/works which has lead to the worst case scenarios presented, such as proposed tree loss. Chapter 6 of the ES, Approach to Environmental Assessment [APP-031], states that assessments are based on 'realistic and likely' worst case options (see paragraph 6.3.40); therefore, the assessments which inform topic environmental assessments should adopt this approach. However, it's apparent that tree loss is proposed in numerous construction/works areas whereby no obvious reasoning for | Tree survey plans, tree quality schedules, preliminary tree removal plans and impact assessment for the Project site are included in **ES Appendix 8.10.1: Tree Survey Report and Arboricultural Impact Assessment** [REP3-037, REP3-038, REP3-039, REP3-040, REP3-041, REP3-042] and include a worst case scenario approach.Trees have been shown as retained within the limits of construction boundary if they are far enough from any proposed construction that there is no possibility of them being removed.<br><br>**ES Appendix 5.3.2 Code of Construction Practice** [ REP1-021] sets out general methodologies and mitigation measures for the Project's construction and **Annex 6 – Outline Arboricultural and Vegetation Method Statement** [REP3-022, REP3-023, REP3-024, REP3-025, REP3-026, REP3-027] includes Preliminary Tree Removal and Protection Plans for the Project including location and standard specification of tree protection fencing. These drawings will be revisited |

| | | |
|---|---|---|
| | removal has been demonstrated or identified from project descriptions stated elsewhere. | and refined during the detailed design process and submitted for approval as part of the area-specific Detailed Arboricultural and Vegetation Method Statements (AVMS) including Detailed Vegetation Removal and Protection Plans and, where required, Detailed Tree Removal and Protection Plans. The AVMS (including its plans) must be submitted to and approved by CBC (following consultation with MVDC and RBBC as appropriate) prior to the removal of any trees or vegetation in that area. The AVMS and associated plans must be substantially in accordance with the oAVMS and associated plans. As such, stakeholders will be able to assess the detailed vegetation loss plans further prior to any vegetation removal occurring.<br><br>The DCO Application does not contain definitive layouts and designs for all developments within the Project. The **Design and Access Statement (DAS)** REP2-032,REP2-033, REP2-034, REP2-035, REP2-036] includes indicative plans and diagrams for some developments. The accompanying **Design and Access Statement Appendix 1 Design Principles** [REP3-056] include project-wide design principles for landscaping which sets out the design of native tree, shrub and hedgerow planting that would be appropriate for developments within the Project. In particular, Landscaping Design Principle L4 directs that any vegetation will be retained and incorporated into the design where feasible to minimise impacts on character and visual resources. Alongside the project-wide design principles, site-specific design principles are included for individual works. |

| | | |
|---|---|---|
| Tree Loss | No evaluation of impacts based on quality and value categorisation has been presented for tree groups & woodlands. | Further breakdown of group removals by category has been provided within the **ES Appendix 8.10.1: Tree Survey Report and Arboricultural Impact Assessment** [REP3-037, REP3-038, REP3-039, REP3-040, REP3-041, REP3-042] D3 submission and will be further expanded upon in the D5 submission. |
| Tree Loss | Conclusions within the Arboricultural Impact Assessment states "the impact of the tree loss is somewhat negated by the low quality of the existing highway infrastructure trees that were planted following construction of the airport roads". However, the tree surveys supplied demonstrate otherwise, with a high proportion of trees adjacent the A23/M23 road corridor found to be assessed as A and B categories (high or moderate arboricultural quality and value). Collectively, they form a functional and integral landscape feature providing screening and numerous ecosystem services which should not be dismissed. No evaluation has been made to demonstrate that proposed reinstatement landscaping will | The majority of the trees contained within groups and areas of woodland within the A23/M23 spur corridor are lower quality infrastructure trees that were either planted as a group following construction of the airport roads or have naturally colonised grass verges. In many cases **ES Appendix 8.10.1: Tree Survey Report and Arboricultural Impact Assessment** [REP3-037, REP3-038, REP3-039, REP3-040, REP3-041, REP3-042] assigns trees of a lower quality within these groups and woodlands a higher category based on their collective merit however, individually many of these trees are of a lower quality. For example, trees within G24 alongside the A23, form a continuous landscape feature planted as a group that was assigned a Category A grade for its collective merit. Many trees within this group would be of a lower condition if surveyed individually. However, they still form part of the group's collective value and as such have been captured as part of the group.<br><br>Reinstatement of scrub and tree planting will be designed in accordance with guidelines by National Highways (DMRB LD117 Landscape Design, the Manual of Contract Documents for Highways Works, Major Projects |

| | | |
|---|---|---|
| | enhance upon the existent structural landscaping features. | and Highways England, DMRB Asset Data Management Manual Volume 13) which would limit the extent of woodland that could be replanted adjacent to the highway, compared to the existing situation.<br><br>Approximately 3.1 ha of woodland planting is currently located within a 9m buffer either side of the highway within the surface access improvements area. The DMRB guidance is clear that climax woodland should not be included within this buffer therefore this woodland planting would need to be removed with or without the NRP to comply with DMRB. Any tree planting within this buffer is subject to agreement with NH.<br><br>**ES Appendix 8.8.1: Outline Landscape and Ecology Management Plan** [REP3-031, REP3-033, REP3-035] sets the overarching landscape vision for the Project. The oLEMP includes Figures 1.2.4 to 1.2.15 Surface Access Landscape Proposals and Figures 1.2.1, 1.2.2, 1.2.3 and 1.2.18 for replacement public open space and green infrastructure proposals. These figures show the principle of landscape design. The mature highway woodland and scrub planting provides a substantial green corridor for the A23 between the Gatwick Airport access roundabout and the Longbridge roundabout. The planting also provides a green buffer between the road and the urban green space of Riverside Garden Park and the buildings and infrastructure of Gatwick, filtering views of traffic, although is not usable, amenity green space. Trees and vegetation to be removed will be replaced within the proposed road |

| | | |
|---|---|---|
| | | corridor with native tree and scrub species, where feasible and wide grass verges. Two new areas of urban green space will be created at Car Park B on the eastern end of Riverside Garden Park. A further area of open space will be created north of Longbridge roundabout, adjacent to Church Meadows. These spaces will include extensive native woodland, scrub and grassland communities which offer usable amenity space for the public, diverse ecological habitats and linkages between urban and rural spaces. The addition of these areas of replacement open space will in time provide greater value, in terms of ecosystem services, than the removed highway planting. The value of the landscape/townscape within the Project site and its context and the visual amenity enjoyed by the local community and visitors to the area has been recognised during the design development. |
| Tree Loss | It is not demonstrated that a realistic worst-case scenario has been applied. | There are many trees currently shown for removal within the worst-case scenario that will potentially be retained at detailed design stage. The current worst-case scenario includes all trees along the M23 corridor that fall within the limits of construction and which are adjacent to the proposed highway works. These trees will be reassessed during the detailed design process and reported in the detailed AVMSs, with the aim of retaining as many as possible. The detailed design must be prepared in accordance with the **Design and Access Statement Appendix 1 Design Principles** [REP3-056], as secured under Requirement 4 of the dDCO (Doc Ref. 2.1 v6). The Applicant would consult the relevant LPA on the detailed design of these developments. Where possible, additional trees will be retained. |

| | | |
|---|---|---|
| | | Area-specific Detailed Arboricultural and Vegetation Method Statements including Detailed Vegetation Removal and Protection Plans and, where required, Detailed Tree Removal and Protection Plans must be submitted to and approved by CBC (following consultation with MVDC and RBBC as appropriate) prior to the removal of any trees or vegetation in that area. The AVMS and associated plans must be substantially in accordance with the oAVMS and associated plans. |
| Tree Loss | T192 and T193 are both A category oak trees situated centrally within a spoil receptor site for soils, known as Pentagon Field, Crawley. Loss of high quality and value trees such as these should be avoided wherever possible, in this instance, amended design could retain these trees within the soil receptor site. | The location of these trees means that it is not possible to retain these trees and deliver the Project because this area is required for spoil placement during construction.<br><br>From the outset the Applicant considered alternative means to retain these trees within the soil receptor site. However this would result in a complex-shaped steep-sided and much higher landform which would be incongruous with the landscape and would also be an ineffective way of managing the spoil and reduce the capacity of the soil receptor site significantly.<br>.<br>. |
| Tree Pruning | Tree pruning is proposed to be assessed during the detailed design | The LEMPS will set out the landscape management regime for existing trees. The proposals within each LEMP will be substantially in |

| | | |
|---|---|---|
| | stage of the Project. This is suggested to be specified within the Detailed Arboricultural Method Statements which are to be approved by the relevant planning authority. However, the delivery of a tree work schedule has not been secured within the Outline Arboricultural Method Statements [REP1-023] to enable this approach. | accordance with **ES Appendix 8.8.1: Outline Landscape and Ecology Management Plan** [REP3-031, REP3-033, REP3-035]. |
| Preservation of Arboricultural Features | Section 1.3 needs to confirm that protection measures within sections 3 and 4 will be identified on detailed Tree Removal and Protection Plans | Section 4 in the Deadline 3 submission of **Appendix 5.3.2: Code of Construction Practice Annex 6 – Outline Arboricultural and Vegetation Method Statement** [REP3-022, REP3-023, REP3-024, REP3-025, REP3-026, REP3-027], confirms that protection measures will be identified on detailed Tree Removal and Protection Plans as part of the detailed AVMSs. |
| Preservation of Arboricultural Features | Section 3.3 needs to secure the delivery of a tree works schedule within the Detailed Arboricultural Method Statements proposed. | The LEMPS will set out the landscape management regime for existing trees. The proposals within each LEMP will be substantially in accordance with **ES Appendix 8.8.1: Outline Landscape and Ecology Management Plan** [REP3-031, REP3-033, REP3-035]. |
| Preservation of Arboricultural Features | Section 3.4 needs to include the general provision for arboricultural input or supervision throughout. | Further detail has been given within the Deadline 3 submission of **Appendix 5.3.2: Code of Construction Practice Annex 6 – Outline Arboricultural and Vegetation** [REP3-022, REP3-023, REP3-024, REP3-025, REP3-026, REP3-027], including a commitment to ongoing monitoring that is to be recorded. |

| | | |
|---|---|---|
| Preservation of Arboricultural Features | Paragraphs 3.4.4 and 3.4.5 need to reflect recommendations made with section 7.2 of BS5837:2012 with regard to avoiding and limiting root damage during excavations. | Wording will be amended within the next submission of **Appendix 5.3.2: Code of Construction Practice Annex 6 – Outline Arboricultural and Vegetation Method Statement** [REP3-022, REP3-023, REP3-024, REP3-025, REP3-026, REP3-027] to reflect the BS5837 recommendations. |
| Preservation of Arboricultural Features | Section 4.4 needs to propose an auditable/audited system of arboricultural site monitoring, including a schedule of specific site events requiring input or supervision. | Site events that require arboriculturist supervision will be identified within the detailed AVMSs. A commitment to record and document this supervision has been given within the D3 submission of **Appendix 5.3.2: Code of Construction Practice Annex 6 – Outline AVMS** [REP3-022, REP3-023, REP3-024, REP3-025, REP3-026, REP3-027] . |
| Preservation of Arboricultural Features | The Tree Removal and Protection Plans [REP1-023, REP1-024 & REP1-025] identifies only the indicative locations for temporary protective fencing surrounding retained trees. Temporary fencing alone does not demonstrate that trees identified for retention are mitigated from adverse construction related impacts; however, providing the measures within sections 3 & 4 of the Outline Arboricultural Method Statement [REP1-023] are adopted and shown on detailed Tree Removal and Protection Plans, adequate mitigation can be | Further details of what will be included on the detailed Tree Removal and Protection Plans has been given within the Deadline 3 submission of **Appendix 5.3.2: Code of Construction Practice Annex 6 – Outline AVMS** [REP3-022, REP3-023, REP3-024, REP3-025, REP3-026, REP3-027]. |

| | | |
|---|---|---|
| | demonstrated at discretion and approval of the relevant planning authority. | |
| Preservation of Arboricultural Features | An additional contractor compound for the reed bed treatment system is identified within figure 5.2.1f of the Project Description Figures [AS-135], a proposed Project change (change request 1). No mitigating tree protection fencing has been identified for trees surrounding this compound. | Section 4 in the Deadline 3 submission of **Appendix 5.3.2: Code of Construction Practice Annex 6 – Outline Arboricultural and Vegetation Method Statement** [REP3-022, REP3-023, REP3-024, REP3-025, REP3-026, REP3-027], confirms that protection measures will be identified on detailed Tree Removal and Protection Plans as part of the detailed AVMSs. |
| Preservation of Arboricultural Features | An indicative haul route, providing linkage to the airfield satellite contractor compound (and laydown area), remains present within figure 5.2.1f of the Project Description Figures [AS-135]. This appears to enter land known as Museum Field through tree group G16 (B2/3 category) which is covered by a TPO (ref. P16.5.6:A1) within Crawley Borough Councils jurisdiction. This group of trees is proposed for retention with protective fencing | Section 4 in the Deadline 3 submission of **Appendix 5.3.2: Code of Construction Practice Annex 6 – Outline Arboricultural and Vegetation Method Statement** [REP3-022, REP3-023, REP3-024, REP3-025, REP3-026, REP3-027], confirms that protection measures will be identified on detailed Tree Removal and Protection Plans as part of the detailed AVMSs. |

| | | |
|---|---|---|
| | preventing access and requires further consideration. | |
| Ancient Woodland/ Required mitigation | Concerns regarding Horleyland Wood (LWS) remain due to the lack of demonstration that protection measures will be implemented to exclude construction activities within its buffer zone preventing construction activities which can lead to adverse impacts (in accordance with statutory planning guidance1). This concern directly relates to the proposed indicative corridor for a pipeline east of Horleyland Wood as shown within figure 5.2.1e of the Project Description Figures [AS-135]. | An assessment of the impact of the project on Ancient Woodland has been expanded within Section 3 of the Deadline 3 submission of **Appendix 5.3.2: Code of Construction Practice Annex 6 – Outline AVMS** [REP3-022, REP3-023, REP3-024, REP3-025, REP3-026, REP3-027], with confirmation that no works will be carried out within a 15m buffer to any Ancient Wooodland adjacent to the Project boundary and will be fenced off with no works undertaken within it (Paragraphs 3.2.1 to 3.3.3 of the Outline AVMS). There are no areas of Ancient Woodland within the Project boundary. |
| Required Mitigation | An evaluation of the quantity of proposed tree planting in comparison to the quantity of tree loss is provided within section 7 of the Arboricultural Impact Assessment. This does not demonstrate proposed tree planting proposals accord with the CBLP policy CH6 as further discussed within section 9 of the Joint West Sussex LIR [REP1-068]. | Updated tree survey plans, tree quality schedules, preliminary tree removal plans and impact assessment for the Project site are included in **ES Appendix 8.10.1: Tree Survey Report and Arboricultural Impact Assessment** [REP3-037, REP3-038, REP3-039, REP3-040, REP3-041, REP3-042] submitted at Deadline 3. Section 7 provides tree replacement figures based on estimated tree removal against Policy CH6, with details on how tree removal numbers were estimated given in Appendix J. |

| | | |
|---|---|---|
| Required Mitigation | The Outline Arboricultural Method Statement [REP1-023] needs to identify and provide methodology for areas of new structural tree planting that need protecting from construction activity to ensure suitable soil conditions and structures are retained. Where not practical or appropriate, preparatory works for new landscaping needs to be specified. For example, Car Park B and Pentagon Field proposes tree planting where these considerations are required. | Methodologies for the conservation of soil resources and the avoidance of damage to soil structures are contained within **ES Appendix 5.3.2 Code of Construction Practice Annex 4 – Soil Management Strategy** [APP-086]. |
| Required Mitigation | Further clarification is required demonstrating how detailed design principles can look to reduce tree loss as the project progresses. Wherever possible, the translocation of suitable young trees should be facilitated in mitigation, as opposed to their removal and compensatory replacement. | There are many trees currently shown for removal within the worst-case scenario that will potentially be retained at detailed design stage. The current worst-case scenario includes all trees along the M23 corridor that fall within the limits of construction and which are adjacent to the proposed highway works. These trees will be reassessed during the detailed design process and detailed AMS with the aim of retaining as many as possible, or if viable translocation will be considered. The detailed design must be prepared in accordance with the Design Principles (Doc Ref. 7.3 v3), as secured under Requirement 4 of the dDCO (Doc Ref. 2.1 v6). The Applicant would consult the relevant LPA on the detailed design of these developments. Where possible, |

| | | |
|---|---|---|
| | | additional trees will be retained. Area-specific Detailed Arboricultural and Vegetation Method Statements including Detailed Vegetation Removal and Protection Plans and, where required, Detailed Tree Removal and Protection Plans must be submitted to and approved by CBC (following consultation with MVDC and RBBC as appropriate) prior to the removal of any trees or vegetation in that area. The AVMS and associated plans must be substantially in accordance with the oAVMS and associated plans. |

**Table 4. GAL's Response to Principal Areas of Disagreement Summary Statement (PADSS) – Version 2 West Sussex County Council [REP3-151]**

| Arboriculture | | | | | |
|---|---|---|---|---|---|
| **Ref** | **Principle Issue in Question** | **Concern Held** | **What need to change/be amended/be included in order to satisfactorily address the concern** | **Likelihood of concern being addressed during Examination** | **GAL's Response** |
| 21. | Evidence for null findings of ancient or veteran trees, as well as important hedgerows. | No demonstration that these receptors have been appropriately surveyed, nor followed appropriate methodology. | Demonstrate the methodology used to survey and identify potential ancient and veteran trees as defined by the NPPF (2021) which could be impacted within or surrounding the project boundary, as well as providing the survey data findings (including for important hedgerows. | Uncertain Likely (if further discussion is initiated) | **ES Chapter 9 Ecology and Nature Conservation** [APP-034] includes an evaluation of veteran and ancient trees and ancient woodland in accordance with the NPS and NPPF in section 9. Hedgerows considered important under the Hedgerow Regulations are also considered in Section 9. |

| | | | | | |
|---|---|---|---|---|---|
| | | | | | Ancient Woodland<br>An assessment of the impact of the project on Ancient Woodland has been expanded within the Deadline 3 submission of the **ES Appendix 8.10.1: Tree Survey Report and Arboricultural Impact Assessment** [REP3-037, REP3-038, REP3-039, REP3-040, REP3-041, REP3-042]. A description of the protection measures for Ancient Woodland and how these are secured see the response to line 24.<br><br>Veteran Trees<br>Veteran trees (VT) have been identified within the survey and plotted onto all plans within the |

| | | | | | |
|---|---|---|---|---|---|
| | | | | | **ES Appendix 8.10.1: Tree Survey Report and Arboricultural Impact Assessment** [REP3-037, REP3-038, REP3-039, REP3-040, REP3-041, REP3-042], with their additional VT buffer zones. No worksare proposed within these buffer zones and no Veteran Trees are proposed for removal. .<br><br>Preliminary tree protection and removal plans forms part of the **Code of Construction Practice Annex 6 – Outline Arboricultural and Vegetation Method Statement** [REP3-022, REP3-023, REP3-024, REP3-025, REP3-026, REP3- |

| | | | | | |
|---|---|---|---|---|---|
| | | | | | 027]and will be detailed in the AVMSs at the detailed design stage.<br><br>Important Hedgerows<br>There are no Important Hedgerows within the Project site. |
| 22. | ~~Lack of~~Need for further demonstration that P~~p~~roject proposals have been adequately designed with consideration of arboricultural features through avoidance, mitigation or compensation. ~~have been considered, designed for and appropriately avoided, mitigated or compensated for.~~ | Potential loss or impacts to multiple ~~to~~ arboricultural features which may be avoidable, mitigated or better compensated for. ~~of unknown value.~~ | Provide a full arboricultural assessment for all arboricultural features in line with BS5837:2012 (inclusive of an impact assessment, outline method statement and tree protection plans). Within the Arboricultural Impact Assessment (REP1-026):<br>- Provide further detail of project proposals to demonstrate the need for the proposed tree removals, notably high quality and TPO trees (justify why mitigating measures | Likely<br>~~Uncertain~~ | Arboricultural features have been considered in the evolution of the design, particularly the surface access improvements where the greatest tree loss is anticipated. The Project has been designed to reduce the environmental impact where possible as demonstrated through Chapter 3 Alternatives and the **ES Chapter 8 - Landscape, townscape and visual resources** [App-033]. |

| | | | | | |
|---|---|---|---|---|---|
| | | | would not be appropriate).<br>• Provide design principles which may reduce tree loss during detailed design.<br>• Identify how Horleyland Wood (and any other ancient woodland) is impacted at a worst case design scenario (including direct and indirect impacts) and detail any measures proposed in mitigation or compensation (such as appropriate buffer zones specific to the site).<br>Identify how compensatory tree planting proposals considers local policy CH6 of the Crawley Borough Local Plan 2015 – 2030 (as detailed withing para. 9.73 of the Joint West Sussex LIR). | | Detailed designs of each element of the scheme will be prepared prior to that part of the development being delivered. DCO Requirements 4 and 5 require detailed designs to be in accordance with the Design Pprinciples within the Design and Access Statement [REP3-056, REP3-057]. Design principle 4 of the **Design and Access Statement Appendix 1: Design Principles** [REP3-056] sets out the objective to retain existing vegetation where ever possible to minimise environmental effects. |

| | | | | | |
|---|---|---|---|---|---|
| | | | | | Tree removal is controlled by **Code of Construction Practice Annex 6 – Outline Arboricultural and Vegetation Method Statement** [REP3-022, REP3-023, REP3-024, REP3-025, REP3-026, REP3-027]. The retained trees will be incorporated into detailed designs as required by the **ES Appendix 8.8.1: Outline Landscape and Ecology Management Plan** [REP3-031, REP3-033, REP3-035] .<br><br>An assessment of the impact of the project on Ancient Woodland has |

| | | | | | |
|---|---|---|---|---|---|
| | | | | | been expanded within the D3 submission of the **ES Appendix 8.10.1: Tree Survey Report and Arboricultural Impact Assessment** [REP3-037, REP3-038, REP3-039, REP3-040, REP3-041, REP3-042]. A description of the protection measures for ancient woodland and how these are secured.<br><br>Local Policy CH6 Section 7 in the D3 submission of ES Appendix 8.10.1: Tree Survey Report and Arboricultural Impact Assessment, details how the CH6 policy has been addressed. |

| | | | | | |
|---|---|---|---|---|---|
| 23. | The ~~OLEMP and CoCP~~ Outline Arboricultural Method Statement does not demonstrate ~~appropriate~~ sufficient ~~outline~~ methodology for tree protection ~~and~~ including ancient woodland buffer zones. | Potential for adverse impacts ~~multiple~~ to arboricultural features, including irreplaceable habitat, due to a lack of tree protection. | ~~Produce an arboricultural assessment and tree protection measures referred to within the OLEMP and/or CoCP.~~<br>Within the Outline Arboricultural Method Statement (REP1-023; REP1-024 & REP1-025):<br>• Provide protection measures to be adopted for ancient woodland buffer zones.<br>• Provide affirmative wording throughout (avoiding words such as "should").<br>• Address conflicting working methodologies (such as 3.2.3 & 4.1.1 conflicting with 3.4.1).<br>• Provide working methodologies for all | Uncertain | The **Code of Construction Practice Annex 6 – Outline Arboricultural and Vegetation Method Statement** [REP3-022, REP3-023, REP3-024, REP3-025, REP3-026, REP3-027] includes Preliminary Tree Removal and Protection Plans in Appendix A and B. Any construction activities must be carried out in accordance with the CoCP under DCO Requirement 7.<br>Each detailed AVMS, which will be subject to CBC's approval, must include detailed Tree Removal and Protection |

| | | | | | |
|---|---|---|---|---|---|
| | | | types of works which may occur with the root protection areas of retained trees (including landscaping works).<br>• Amend section 4.4 to ensure monitoring is recorded and accounts for other tree protection measures such as ground protection.<br>• Provide 'heads of terms' ~~and~~ and general principles to be included within the detailed arboricultural method statements which accounts for all working methodologies near trees, tree work operations, and provision of physical tree protection. | | Plans. The detailed Tree Removal and Protection Plans must be substantially in accordance with the Preliminary Tree Removal and Protection Plans.<br><br>The oVAMS submitted at Deadline 3 addressed a number of these comments as follows:<br>• Language checked to be appropriate for a control document<br>• Clarifications added to remove any conflicting methodologies<br>• tree protection methodologies, general principles and |

| | | | | | |
|---|---|---|---|---|---|
| | | | • Identify what will be shown within tree protection plans.<br>• Identify when arboricultural advice or supervision will be required for working methodologies near trees.<br>Where appropriate, amend the CoCP to reflect any changes as a result of the above. | | landscaping works included<br>The approach to reporting by an arboriculturalist is included in section 5 of the oAVMS<br>• Section 3 of the oAVMS describes when arboriculturalist advice or supervisions is required<br><br>Paragraphs 5.4.4 of the CoCP (DCO Requirement 7) requires that "Measures will be put in place to ensure that a minimum 15 metre buffer is retained between ancient woodland and |

| | | | | | |
|---|---|---|---|---|---|
| | | | | | construction areas. Appropriately sturdy fencing (in accordance with BS 5837) will be erected around the 15-metre buffer to prevent access by people, materials or machinery to avoid compaction of soils or<br>roots and to avoid any accidental damage.".<br><br>Tree protection forms part of the oVAMS. Any construction activities must be carried out in accordance with the CoCP under DCO Requirement 7 |
| 24. | The OLEMP does not provide ~~clarity that detailed arboricultural method~~ | ~~Potential impacts multiple to arboricultural features due to a lack of tree~~ | The OLEMP ~~should identify that the following will be produced in detail and refer to best practice or guidance in~~ | ~~Uncertain~~Likely | DCO Requirement 8 requires a LEMP substantially in accordance with the **ES Appendix 8.8.1:** |

| | | | | | |
|---|---|---|---|---|---|
| | ~~statements and planting plans and aftercare~~ sufficient detail to ensure that adequate planting and aftercare plans ~~management~~ will be provided within proposed LEMPs. | ~~protection, and unclear proposed compensatory soft landscaping.~~ Inadequate provision of aftercare for proposed tree planting. | ~~which they should adhere to: arboricultural method statements; tree protection plans, tree/vegetation removal plans and tree work schedules;~~ needs to identify what will be included within the detailed planting and specification plans. It also need to provide adequate aftercare for tree planting (as detailed withing para. 9.72 of the Joint West Sussex LIR)~~; and, planting aftercare and management plans.~~ | | **Outline Landscape and Ecology Management Plan** [REP3-031, REP3-033, REP3-035] to be approved by CBC.<br><br>In relation to the planting and specifications, paragraph 1.14 requires each LEMP to include "the landscape and ecology works for that area in compliance with the objectives and principles of the relevant zone as described in this oLEMP"<br><br>In relation to the aftercare of tree planting, paragraph 1.1.4 of the oLEMP specifies that each |

| | | | | | |
|---|---|---|---|---|---|
| | | | | | LEMP must include "The required monitoring and management arrangements, and the associated timetable and duration;" |
| 25. | Inadequate consideration and demonstration for the protection of ancient woodland. Conflicting with the finding of 'no impact' occurring to these receptors. | Potential impact to ancient woodlands receptors where barriers are specified to form buffer zone protection. This is of principle concern for Horleyland Wood due to the adjacent proposed works area for the new foul water pipeline. | Where barriers are specified to form buffer zone protection, spacing/distance of buffer should follow recommendation withing statutory guidance provided by Natural England and Forestry Commission 2022. The specification and methodology for the proposed barriers and need to be demonstrated. ~~Further,~~ ~~the appropriate positioning of barriers~~ ~~needs to be identified on tree protection~~ ~~plans.~~ | ~~Uncertain~~Likely | Paragraphs 5.4.4 of **Code of Construction Practice Annex 6 – Outline Arboricultural and Vegetation Method Statement** [REP3-022, REP3-023, REP3-024, REP3-025, REP3-026, REP3-027](DCO Requirement 7) requires that "Measures will be put in place to ensure that a minimum 15 metre buffer is retained between ancient woodland and construction areas. Appropriately sturdy |

| | | | | | |
|---|---|---|---|---|---|
| | | | | | fencing (in accordance with BS 5837) will be erected around the 15-metre buffer to prevent access by people, materials or machinery to avoid compaction of soils or roots and to avoid any accidental damage."<br><br>Section 3 of the oAVMS specifies specific protections for the four ancient semi-natural woodlands identified within the AIA. Appendix E [REP3-026] to the oAVMS provides details of the fencing to be used. |
| 26. | Compensation strategies for tree, woodland and hedgerow loss does not ~~demonstrating~~demonstra | The net loss of woodland, the fragmentation of habitat | ~~An increased compensation strategy for compensatory woodland planting.~~ | Uncertain | **ES Appendix 8.8.1: Outline Landscape and Ecology Management Plan** |

| | | | | | |
|---|---|---|---|---|---|
| | te adequate compensation.~~, and that proposed compensation being recognised as a significant long-term impact.~~ | connectivity, and the long-term effect from the time required to establish new planting. | The OLEMP lacks demonstration that compensatory tree planting proposals considers local policy CH6 of the Crawley Borough Local Plan 2015 – 2030 (as detailed withing para. 9.73 of the Joint West Sussex LIR). | | [REP3-031, REP3-033, REP3-035] sets the overarching landscape vision for the Project. The document was prepared before the analysis of tree loss in accordance with CBC Policy CH6 had been undertaken. However, a key objective of the oLEMP is Landscape Integration: to provide an appropriate setting for the new developments within the airport, responding to adjacent urban and rural land uses and the existing character of the airport. Retention of green infrastructure assets wherever |

| | | | | | |
|---|---|---|---|---|---|
| | | | | | possible. Integration with and expansion of the existing green infrastructure network within and around the airport. Enhancing, restoring and reintroducing characteristic landscape elements which have been lost or degraded. Landscape design objectives for the Surface Access zone are included at Section 3.7 and Landscape Proposals for the zone are included at Section 4.7 of the oLEMP. Trees and vegetation to be removed will be replaced within the proposed road corridor |

| | | | | | |
|---|---|---|---|---|---|
| | | | | | with native tree and scrub species, where feasible. Two new areas of urban green space will be created at Car Park B on the eastern end of Riverside Garden Park. A further area of open space will be created north of Longbridge roundabout, adjacent to Church Meadows. These spaces will include extensive native woodland planting. |