



Gatwick Airport Northern Runway Project

Appendix G: Response to Ben Benatt's Deadline 3 Submission

Book 10

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Table of Contents

1	Introduction	1
2	The Applicant's Response	1

1 Introduction

- 1.1.1 This document provides the Applicant's response to the Deadline 3 submission made by Ben Benatt [[REP3-159](#)].

2 The Applicant's Response

- 2.1.1 Mr Benatt's comments are presented below in italics with the Applicant's responses subsequent.

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*

2.1.2 The location of these BOAs was recognised in the Environmental Statement (see Figure 3.2.2 of **ES Appendix 9.6.1 Ecology Desk Study** [[APP-123](#)] and Table 9.6.1 and Table 9.6.5 of **ES Chapter 9 Ecology and Nature Conservation** [[APP-034](#)]). They were considered to be of County value. Potential effects on these BOAs from the Project is described in Section 9 of **ES Chapter 9 Ecology and Nature Conservation** [[APP-034](#)]. Effects identified included a number of temporary, not significant habitat losses. The Project has had regard to the aims of the BOAs relevant to the site (i.e. those that occur partially within it):

- Upon completion of the works at Pentagon Field, new tree planting would be undertaken along the eastern boundary resulting in increased woodland within the BOA. This would contribute towards the BOA's targets to create more woodland and creating ecological enhancements; and
- The objectives of the River Mole BOA are to restore and create the following priority habitats; floodplain grazing marsh; wet woodland; rivers; meadows; and, reedbeds. The Project will create wet woodland within the Brook Farm area along with new areas of reedbed. Importantly, it will also improve the River Mole both with respect to total length of channel and shape/flow characteristics through the planned diversion.

2.1.3 In addition, although not directly impacted by the Project, the survey work undertaken within both Glover's Wood and Edolph's Copse BOA as part of the bat trapping and radio tracking exercise (**ES Appendix 9.6.3 Bat Trapping and Radio Tracking Surveys** [[APP-131](#) and [APP-132](#)]) elucidated the location and extent of Bechstein's bat maternity roosts within these woodlands and the surrounding landscape. These data can now be used to further the aim of the BOA of species recovery through targeted management of those woodlands.

- 2.1.4 As such, although there is not yet a formal Nature Recovery Network for the Gatwick area, the Project has had regard to the presence of the BOAs both in terms of targeting habitat creation in appropriate locations and with respect to the overall aims of the Ecology Strategy for the Project. Further, although not set out in these terms, the Ecology Strategy for the site provides what is, in essence, a Local Nature Recovery Plan for the Gatwick estate and wider area, enhancing the key wildlife corridors along the various water courses and providing wildlife nodes throughout the site where none currently exist (such as within Car Park B, along the Gatwick Stream).

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.

- 2.1.5 The Ecology Strategy for the Project is set out in Section 6 of **ES Appendix 8.8.1 Outline Landscape and Ecology Management Plan (oLEMP)** [[REP3-031](#), [REP3-033](#) & [REP3-035](#)]. It has been designed to build on the existing award-winning biodiversity approach within the airport¹, enhancing and expanding the existing biodiversity areas and improving connectivity along the various water courses present. It incorporates both the Gatwick Woods and River Mole BOAs, ensuring that the aims of these areas are included within the overall strategy.

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.

- 2.1.6 The maps of Nature Recovery Networks (NRNs) for the areas around Gatwick have not been produced to date. As such, it is not possible to formally recognise these within the planning system. However, as set out above, the presence of the BOAs provides the opportunity to feed into the assumed aims of the NRNs. The Project has incorporated both BOAs into the Ecology Strategy for the airport, building on the work that Gatwick have already achieved in the 10 years since

¹ Gatwick have retained the Wildlife Trust's Biodiversity Benchmark award every year since 2014. The award demonstrates the airport's continued commitment to enhancing biodiversity within the site.

the airport was first awarded the Wildlife Trusts' Biodiversity Benchmark. As such, the Project has accounted for the NRNs.

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).

- 2.1.7 As set out in Section 9.4.6 et seq. in **ES Chapter 9 Ecology and Nature Conservation** [[APP-034](#)], the study area considered the landscape surrounding the Project and, where necessary, surveys were undertaken for mobile species away from the Project site. This included with respect to bats, where a landscape-scale radio tracking study was completed and is reported in **ES Appendix 9.6.3: Bat Trapping and Radio Tracking Surveys** [[APP-131](#) and [APP-132](#)]. This ensured that there could be consideration of potential effects at a landscape scale.
- 2.1.8 With respect to the provision of habitats outwith the Airport, it should be noted that both Museum Field and the Brook Farm area were off-airport areas but have been included within the Order Limits to extend the reach of the biodiversity enhancement proposed as part of the Project. As such, the Project is already delivering habitat creation measures that further the goals of the Ecology Strategy for the airport, as set out in Section 6 of **ES Appendix 8.8.1: Outline Landscape, Ecology Management Plan** [[REP3-031](#), [REP3-033](#) & [REP3-035](#)].
- 2.1.9 The Project's approach to the delivery of BNG is set out in **ES Appendix 9.9.2 Biodiversity Net Gain Statement** [[REP3-047](#)]. This demonstrates that the Project is achieving over 20% BNG. As such, there is no requirement for additional off-site provision of BNG credits.

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).

- 2.1.10 Ecological impacts of the NRP that extend beyond the project boundary have been assessed in **ES Chapter 9: Ecology and Nature Conservation** [[APP-034](#)] Section 9.4 of Chapter 9 of the Environmental Statement explains the assessment methodology which was used in carrying out the impact assessment and paragraphs 9.4.6 to 9.4.12 describe how the zone of influence (Zol) for the assessment was determined. This includes for receptors outwith the DCO boundary such as designated sites and mobile protected species such as bats and great crested newts.
- 2.1.11 An **Invasive Non-Native Species Management Strategy** (Doc Ref 5.3) must be complied with during the construction of the Project (DCO Requirement 7). Prior to commencement of construction in an area an INNS survey must be carried out and if INNS is identified a detailed INNS Plan must be approved by CBC in consultation with the Environment Agency.
- 2.1.12 The principles of operational INNS management are set out in the oLEMP and will therefore be incorporated into relevant LEMPs pursuant to DCO Requirement 8.
- 2.1.13 The Project incorporates significant enhancement to green corridors and improved habitat connectivity, including along both the Gatwick Stream and River Mole, through their explicit incorporation into the Ecology Strategy for the Project (paragraph 6.5.9 of the oLEMP), the implementation of which will follow the principles set out in the oLEMP. As such, it is not correct to say that these key corridors have been missed.

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).

- 2.1.14 The effect of the loss of woodland and other habitats along the A23 and the effect this would have on receptors such as birds and bats that utilise these areas was recognised in Section 9 of **ES Chapter 9 Ecology and Nature Conservation** [[APP-034](#)] as being of moderate adverse significance which was significant in EIA terms for the duration of the construction period and until the woodland had matured sufficiently to restore the same level of ecological functioning (anticipated to be by circa 2047). However, the Project has been

designed to ensure that the overall connectivity through the length of the A23 is not severed at any point, with at least a 10-15m buffer of retained vegetation present along the Gatwick Stream to ensure connectivity, although reduced, is never severed.

- 2.1.15 In addition, paragraph 5.4.20 of **ES Appendix 5.3.2 Code of Construction Practice (CoCP)** [[REP1-021](#)] (secured by DCO Requirement 7) sets out measures that will be adopted during construction to ensure the maintenance of a dark corridor along the Gatwick Stream, in particular where it meets the River Mole, to ensure connectivity for bats is maintained.

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 REP1097).

- 2.1.16 The areas of woodland lost and replanted are quantified in Annex 3 of **ES Appendix 9.9.2 Biodiversity Net Gain Statement** [[REP3-047](#)]. Annex 3 shows that there is an overall loss of woodland area of 5.70ha. Figures 2.1 to 2.6 of Appendix 9.9.2 show the location of habitats lost and gained during the various assessment years of the Project.

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).

- 2.1.17 The loss of such habitats is quantified in Annex 3 of **ES Appendix 9.9.2 Biodiversity Net Gain Statement** [[REP3-047](#)]. The assessment includes quantifying the scale of replacement and new planting in order to demonstrate how the proposals meet Local Plan policy requirements. Annex 3 shows that there is an overall gain in scrub (4.07ha), wetland (1.17ha), watercourse (1.20ha) and individual trees (0.46ha). There is an overall loss of woodland (as described above), sparsely vegetated land (0.34ha) and grassland (8.07ha). With respect to this last habitat, however, there is a significant gain in value, despite the loss of area, with a gain in biodiversity units of 100.86. This is driven by the losses of grassland being primarily improved airfield grass being replaced by more valuable other neutral grasslands in Brook Farm.

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).

- 2.1.18 The requirement for habitats to mature to fully replace those lost is recognised within the ES through the maintenance of moderate adverse effects until the future forecast year (2047), with the full functionality of the corridors restored sooner as the woodland establishes but before it reaches full maturity.

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).

- 2.1.19 As set out in Section 9 of **ES Chapter 9: Ecology and Nature Conservation [APP-034]**, the two ponds impacted by the Project (Pond A and Pond F) are both surface water management features and not HPI Priority ponds; they are considered to have no more than local ecological value. The impacts to these ponds were considered to be of no more than minor adverse significance. Provision of new ponds within the airport site is not possible due to aircraft safety and bird strike risks.

- 2.1.20 Although no new ponds are proposed, the Project will provide substantial new areas of aquatic habitat in the form of new reedbeds and the extension to the River Mole and the enhancement of the river corridor.

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).

- 2.1.21 Details of the assessment of such impacts on SSSI are set out in Appendix G of the **Supporting Air Quality Technical Notes to Statements of Common Ground [REP1-050]** submitted at Deadline 1. This will be supplemented with additional survey work completed following agreement with Natural England to map the bryophyte distributions at Westerham Woods SSSI. This will be to identify whether an exceedance of 1% of the critical level for ammonia emissions as a result of the Project was coincident with any important bryophyte population for which Westerham Woods SSSI is designated.

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).

- 2.1.22 The approach to the long-term management and maintenance of the habitats on site is set out in section 10.1.6 of the oLEMP [REP3-031], committing GAL to ensure it occurs for a minimum period of 30 years from the date of completion of planting. Further details will be included in the area specific LEMPs as required by DCO Requirement 8.

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).

- 2.1.23 As set out in Section 9 of ES Chapter 9 Ecology and Biodiversity, no long-term significant effects are predicted on woodland or bats as a result of the Project, once the mitigation planting is accounted for.

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.

- 2.1.24 As set out above, although there is no formal Nature Recovery Network for the Gatwick area, the Project has had regard to the presence of the BOAs within the Project both in terms of targeting habitat creation in appropriate locations and with respect to the overall aims of the Ecology Strategy for the Project. Further, although not set out in these terms, the Ecology Strategy for the site provides what is, in essence, a Local Nature Recovery Plan for the Gatwick estate and wider area, enhancing the key wildlife corridors along the various water courses and providing wildlife nodes throughout the site where none currently exist (such as within Car Park B, along the Gatwick Stream).