



# Gatwick Airport Northern Runway Project

Response to the Examining Authority's Written Questions  
(ExQ2) – Ecology and Nature Conservation

**Book 10**

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# 1 Response to the Examining Authority’s Written Questions – Ecology and Nature Conservation

1.1.1 The below table sets out the Applicant’s response to the Examining Authority’s Written Questions relating to Ecology and Nature Conservation.

ExQ2	Question to:	Question:
<b>ECOLOGY AND NATURE CONSERVATION</b>		
EN.2.1	Natural England	<p><b>Biodiversity Net Gain land included in calculation</b></p> <p>Natural England (NE) stated in its Relevant Representation (RR) [RR-3223] that it agrees with the Applicant’s approach to Biodiversity Net Gain calculations based only upon land impacted during the project (230.09ha) instead of all land within the Order limits (735ha). Since NE made its RR, DEFRA guidance on calculating biodiversity value with the statutory biodiversity metric was updated in February 2024 and states:</p> <p><i>“If you are making an on-site calculation, you will need to include everything that exists within a development’s red line boundary. This includes all features, whether or not they may be lost, retained or improved.”</i></p> <p>Given the updated guidance from DEFRA, NE is asked to confirm whether its position has changed from its RR?</p>
		N/A – this question is not directed at the Applicant.
EN.2.2	Applicant Local Authorities	<p><b>Biodiversity Opportunity Areas</b></p> <p>At ISH8 the Applicant stated that it had not considered ecological enhancement within surrounding Biodiversity Opportunity Areas (BOAs) (other than Gatwick Woods and River Mole) because the surrounding BOAs were</p>

		<p>too far from the Order limits. The ExA notes that Ifield Brook BOA is shown very close to the Order limits on figure 9.6.2 of [APP-048] and both Grattons Park BOA and the Glover’s Wood and Edolph’s Copse BOA are within 2 kilometres of the Order limits.</p> <p>a) The Applicant is asked to clarify the distances from the Order limits that opportunities for ecological enhancements were considered?</p> <p>b) The Applicant and Local Authorities are asked to comment on whether opportunities for woodland enhancement to mitigate the loss of woodland within the Order limits should be considered within the Ifield Brook BOA, Grattons Park BOA and the Glover’s Wood and Edolph’s Copse BOA?</p> <hr/> <p>a) The process to determine what ecological enhancement was appropriate and possible started at an early stage of the project development. The Applicant identified that the fields outwith the existing airport boundary within Brook Farm were potential options for proportionate ecological enhancement as they were strategically placed adjacent to the proposed water attenuation feature at Museum Field and contiguous with the woodland along the northern bank of the River Mole. As such, the fields (at Brook Farm) could be readily incorporated into the existing biodiversity areas, with significant ecological benefit and with the virtue of making management straightforward through proximity to existing land managed for biodiversity benefit.</p> <p>In addition, it was important for the ecology enhancement chosen to reinforce existing ecological features on within the airport. For example, the bund to the south of Brockley Wood was created as part of the diversion of the River Mole in the early ‘00’s. It has subsequently developed into a significant resource for invertebrates with a range of rare species present (such as the long-horned bee), benefiting what is the Open Mosaic Habitats (OMH) Habitat of Principal Importance (HPI). Consequently, when the Museum Field flood attenuation area was being designed, the Applicant took the opportunity to replicate the River Mole bund within this area with arisings from the new attenuation feature to be formed into a bund with</p>
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		<p>similar OMH, with the aim of duplicating the habitat conditions that have been so successful for invertebrates.</p> <p>Likewise, the land at Longbridge Roundabout (part of which is required for highways drainage attenuation) is similarly strategic in its location adjacent to the River Mole. Once these off-airport areas were identified, they were incorporated into the Order Limits as they formed a key component of the Ecology Strategy for the Project. The edge of Brook Farm is circa 460m from the existing airport boundary. As such, this is the distance away from the existing airport that the Project considered formal ecological enhancement. It was not considered necessary to go further away than this with respect to the delivery of ecological enhancement; the land at Brook Farm will be enhanced to deliver significant ecological benefit that would allow the Project to achieve circa 12% net gain.</p> <p>In addition, although it is not possible to quantify the exact distance over which such benefits would be measurable, the realignment of the River Mole, and associated improvements for fish passage through the existing culvert, is anticipated to result in improvements to the flow characteristics and fish population status downstream of the Order limits.</p> <p>b) The overall Ecology Strategy for the Project is set out in Section 6 of <b>ES Appendix 8.8.1 outline Landscape and Ecology Management Plan (oLEMP)</b> [<a href="#">REP6-032</a>, <a href="#">REP6-034</a>, <a href="#">REP6-036</a>]. This demonstrates how the Project will provide a significant gain for ecology through the delivery of a diverse but cohesive range of habitats, building on and linking existing resources. This includes extensive new wildflower grassland, scrub and woodland within the Museum Field Environmental Mitigation Area, new reedbeds within the existing Land East of the Railway, woodland along Pentagon Field, the replacement of an existing carpark (Carpark B) with an area of grassland, scrub and woodland and the creation of circa 200m of new water course on the River Mole.</p> <p>These features have taken account of the aims of the Biodiversity Opportunity Areas (BOAs) that sit within and adjacent to the Project to ensure that such habitat creation is appropriate; for example, the creation of woodland to support the Gatwick Woods BOA and the extension of the River Mole and creation of wet</p>
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		<p>woodland to support the River Mole BOA. They have also accounted for the findings of the survey work completed on site and the requirement to enhance habitats for species identified as present.</p> <p>Further, the Applicant provided details of additional woodland planting in the Museum Field Environmental Mitigation Area at Deadline 6 (section 1.1.7 <i>et seq</i> in <b>Note on Project-wide Habitat Loss and Replacement</b> [<a href="#">REP6-071</a>]). This update increased the tree planting within the Project to ensure that, overall, there was a net gain in tree numbers compared to the baseline (as set out in Appendix J of <b>ES Appendix 8.10.1: Tree Survey Report and Arboricultural Impact Assessment</b> [<a href="#">REP6-038</a>, <a href="#">REP6-040</a>, <a href="#">REP6-042</a>, <a href="#">REP6-044</a>, <a href="#">REP6-046</a>, <a href="#">REP6-048</a>]). As such, the Applicant considers that the ecology enhancement provided within the Project Order Limits is significant, appropriate and proportionate and that, therefore, there is no requirement to seek additional enhancement off site. .</p>
EN.2.3	Applicant	<p><b>Multi Storey Car Park light spill</b></p> <p>The ExA note the Applicant’s response to ExQ1 EN1.12 [<a href="#">REP3-090</a>]. However, light spill from Multi Storey Car Parks (MSCPs) is typically not limited to lighting design but also due to car headlights within the MSCP and the open façade areas required for ventilation.</p> <p>The Applicant is asked if there should be a design principle relating to the design of MSCP façades minimising light spill into adjacent habitat areas?</p> <p>The <b>Design Principles</b> (Doc Ref. 7.3 v5) contain 11 lighting-related Project-wide Design Principles. In particular, and as explained in <b>The Applicant’s Response to ExQ1 – Ecology and Nature Conservation</b> [<a href="#">REP3-090</a>], <b>EN.1.12</b>, Design Principles LA8 and LA11 require lighting to avoid disturbance to areas of value for bats and to control lighting so that light remains within the site boundary. Notwithstanding this and in response to ExQ2 EN.2.3, the Applicant has amended Design Principle LA8 to make explicit reference to preventing light spill onto adjacent habitat areas. The updated <b>Design Principles</b> (Doc Ref. 7.3 v5) are submitted at Deadline 7.</p>

		<p>These Project-wide Design Principles are applied to the Project as a whole and therefore a separate site-specific Design Principle to manage light spill from the proposed multi-storey car parking is not necessary.</p>
EN.2.4	West Sussex Joint Local Authorities	<p><b>Realistic worst-case tree removal</b></p> <p>In response to comments from the West Sussex Joint Local Authorities, the Applicant has reduced the extent of tree removal along the surface access corridor in the outline Arboricultural and Vegetation Method Statement (oAVMS) submitted at D6 [REP6-018].</p> <p>The West Sussex Joint Local Authorities are asked to comment on whether it is satisfied that the proposed tree removal represents a realistic worst-case? And, if not, identify where requirement for removal has not been demonstrated.</p>
		N/A – this question is not directed at the Applicant.
EN.2.5	Applicant	<p><b>Horleyland Woods - Alignment of surface water/ foul water works</b></p> <p>The ExA notes that the oAVMS [REP3-022] states the proposed surface water/ foul water works will be changed during detail design to be outside of the 15m buffer zone for Horleyland Woods.</p> <p>The Applicant is asked if Appendix B of the oAVMS [REP3-026] will be updated and submitted into the Examination showing the indicative route of the works outside of the 15m buffer zone?</p>
		<p>The <b>Code of Construction Practice Annex 6 – Outline Arboricultural and Vegetation Method Statement</b> [<a href="#">REP6-018</a>, <a href="#">REP6-020</a>, <a href="#">REP6-022</a>, <a href="#">REP6-024</a>, <a href="#">REP6-026</a>, <a href="#">REP6-028</a>] has been amended and submitted into the Examination at Deadline 7. The text within Section 3.3 has been amended as follows <i>‘Horleyland Wood is adjacent to the proposed surface water/foul water works. The indicative alignment of the underground services</i></p>

		<p><i>is located outside of the 15m ASNW buffer zone (See Appendix B). The Airport Preliminary Tree Removal and Protection Plans, sheet 9 of 13, Diagram. 758 will be amended.</i></p> <p>Project Change 4 relates to the On-Airport Wastewater Treatment Works ('On-airport WWTW') and which has been accepted by the ExA into the Examination. In the event that the On-airport WWTW forms part of the final Project (as it is an 'alternative' solution for wastewater treatment as explained in the <b>Second Change Application Report</b> [<a href="#">REP6-072</a>]), the proposed pipeline on the eastern side of the Brighton-London mainline railway connecting to Crawley Sewage Treatment Works (and which is currently shown within the Horleyland Wood Ancient Woodland buffer zone) would not be required. The detail of Project Change 4, including any changes to the proposed wastewater pipelines in the event that the On-airport WWTW is delivered as part of the Project, is explained in paragraph 2.2.6 of the <b>Second Change Application Report</b> [<a href="#">REP6-072</a>].</p>
EN.2.6	Applicant	<p><b>Inspection and monitoring after flood events</b></p> <p>In the SoCG between the Applicant and the EA [<a href="#">REP5-057</a>], the Applicant states that the re-aligned River Mole and its open lidded culvert channel should be inspected post a significant storm event for 10 years after construction. However, the updated outline Landscape and Ecology Management Plan (oLEMP) at D4 [<a href="#">REP4-012</a>] states in paragraph 11.19.7 that the monitoring is carried out over a period of between 3 to 5 years, and data is collected at intervals of 3 to 6 months, and after flood events.</p> <p>Can the Applicant clarify this apparent discrepancy and update the oLEMP if required.</p> <p>An amended oLEMP is submitted at Deadline 7, amended to read (at section 11.19.7): <i>The re-aligned River Mole and its open lidded culvert channel would be inspected at intervals of 3 to 6 months and post a significant storm event for 10 years after construction.</i></p>
HABITAT REGULATIONS ASSESSMENT		



EN.2.7	NE	<p><b>Ammonia Modelling Data</b></p> <p>Through ExQ1 EN.1.19 the Applicant was asked to provide or signpost to the ammonia modelling data which informed the Habitat Regulations Assessment (HRA) conclusions.</p> <p>NE is asked if it considers that the Applicant’s response to ExQ1 EN.1.19 [REP3-090] provides sufficient information to support its conclusions in the Habitat Regulations Assessment Report (HRAR) [REP3-043]?</p> <p>N/A – this question is not directed at the Applicant.</p>
EN.2.8	NE	<p><b>Thursley, Ash, Pirbright &amp; Chobham Special Area of Conservation</b></p> <p>In relation to Thursley, Ash, Pirbright &amp; Chobham Special Area of Conservation, NE is asked to confirm if it is content with the favourable / unfavourable statuses provided by the Applicant and that the information provided in the HRAR is specific enough to the parts of the sites affected?</p> <p>N/A – this question is not directed at the Applicant.</p>
EN.2.9	Applicant	<p><b>Noise and Bats</b></p> <p>The SoCG between the Applicant and Horsham District Council [REP5-042] mentions a review of potential impacts of noise on bats which is ongoing with NE.</p> <p>The Applicant is asked to confirm when this will be available to submit into the Examination? Furthermore, when the review is submitted, the Applicant is asked to outline the implications on the ES and/or HRAR and confirm that the review is agreed with NE.</p> <p>A technical note providing further details to those already in <b>ES Chapter 9: Ecology and Nature Conservation</b> [APP-034] with respect to the potential for disturbance effects of noise on bats was submitted to</p>

		<p>the Examination at Deadline 5 (section 3 of <b>Supporting Ecology Technical Notes</b> <a href="#">[REP5-069]</a>). The conclusion of this note (section 3.1.11) was that there would be no effect on any bats, given the high-noise environment bats were already acclimated to. As such, there are no implications for either the ES nor the HRAR.</p> <p>The Applicant has discussed the matter with Natural England who have confirmed their agreement with the Applicant's assessment, and it is intended that this will be reflected in the final SoCG to be submitted into the examination at Deadline 9.</p>
EN.2.10	Applicant NE	<p><b>Draft Licences</b></p> <p>The SoCG between the Applicant and NE [REP6-061] states that a draft licence for badgers has been provided to NE and great crested newt surveys would be complete by mid-May with a draft licence sent to NE by D5.</p> <p>The Applicant and NE are asked to provide an update on the status of the draft licenses and whether NE would be in a position to issue Letters of No Impediment before the end of the Examination.</p>
		<p>The draft badger licence and great crested newt licence have been provided to Natural England and are currently being considered.</p>
EN.2.11	Applicant	<p><b>HRAR mitigation measures</b></p> <p>It is not clear whether or at which stage mitigation measures have been identified and considered in the HRAR [REP3-043]. The Applicant is asked to clarify whether it considered mitigation measures in the HRAR, what mitigation measures were considered, the stage they were considered and signpost where this can be evidenced in the HRAR.</p>

		<p>The HRAR determined whether there were any likely significant effects on relevant sites as a result of the Project in accordance with the “People over Wind” ruling and Advice Note 10 (paragraph 3.15) (paragraph 2.2.5 of <a href="#">REP3-044</a>). The screening assessment assumed matters that were integral to the Project as set out in the respective assessment chapters of the Environmental Statement, but in accordance with the Advice Note acknowledged that it would not be appropriate at the screening stage to take account of measures intended to avoid or reduce the harmful effects of a project on a designated site.</p> <p>It was not necessary to rely upon mitigation measures at Appropriate Assessment stage to conclude no adverse effect on the integrity of the European sites considered in the HRAR.</p>
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