



## **Gatwick Northern Runway Project DCO (Project Reference: TR020005)**

### **Deadline 9 Submission (21 August 2024)**

**Joint Surrey Councils – Surrey County Council (Ref. 20044665), Mole Valley Borough Council (Ref: 20044578), Reigate and Banstead Borough Council (Ref. 20044474) and Tandridge District Council (Ref: 20043605)**

### **Overview**

1. This document provides a response at Deadline 9 from the above Joint Surrey Councils (JSCs) on a number of Deadline 8 submissions.
2. The Joint Local Authorities have provided collective comment on a range of submissions. These have been submitted by Crawley Borough Council on behalf of the authorities. The Joint Surrey Councils have all submitted their own final PADSS. A final SoCG for each authority has been submitted by the Applicant.
3. The Legal Partnership Authorities' have provided comments on the ExA's proposed DCO changes and the draft DCO and an update on the S106. These have been submitted by West Sussex County Council on behalf of the Legal Partnership.

### **Response to GAL submissions at Deadline 8**

#### **Surface Access Commitments – Version 5 [REP8-053]**

4. The Legal Partnership authorities have submitted principal concerns regarding the SACs alongside a track changed version, highlighting further revisions required.

#### **Bat Tree Survey Report [REP8-104]**

5. The advancement of the bat survey programme for trees to be removed as part of the scheme is welcomed. The bat surveys and report have used the most up to date bat survey guidelines for classification of trees and methodology (which is also welcomed). The bat survey programme is currently incomplete, with a number of further surveys yet to complete but to date, no confirmed bat roosts have been identified in any of the trees. Out of the 192 trees to be felled, a total of 174 trees were subjected to further assessment via aerial surveys, endoscope or nocturnal bat emergence surveys. Whilst no bat roosts have been identified to date, it is clear that the trees which are to be removed provide a significant 'roosting resource' for the local bat population. The mitigation provided by the scheme should ensure that there is no reduction in roost resource following development and ideally provide an enhancement to roosting resource (increase the number of roosting locations) for bats. Care will need to be taken to provide replacement roosts upfront (i.e. before tree felling) so that there is no temporary loss of roosting resource. Irrespective of the final bat survey results, pre-fell bat inspection of PRF-I and PRF-M trees will be required immediately prior to felling.

6. Table 3-1 GLTA Results table – There are at least 12 trees detailed in this table which have been classified as PRF-I and PRF-M and the ‘recommendations for further inspection or survey’ column currently states ‘No further action required’. This is misleading as Bat Conservation Trust guidance for PRF-I and PRF-M trees recommend that further inspection / survey for bats is required on these trees. A couple of examples of this are Ash tree 0361 (PRF-M) and Oak tree 0012 (PRF-I). We believe this to be an error as in Table 3-2 Aerial Inspection Results – these trees appear to have had a first aerial inspection carried out, but upon closer inspection, the roosting features observed from the ground are not suitable for roosting bats. The report would benefit from explaining this and making it very clear so that all readers of the report will be able to understand easily.

#### Appendix B - Response on Landscape and Ecology [REP8-117]

7. We note on page 37 in response to our comments on the actions for ISH8 Ecology that the Applicant has not answered our query on BNG additionality. We still query how the Applicant has considered / approached mitigation for protected species within the BNG assessment? For example, the receptor site for reptiles will be enhanced through the ‘*creation of mixed scrub and species-rich grassland bounded by new broadleaved woodland*’ (Paragraph 2.1.5 of Appendix 5.3.2 of the ES). Have these habitat creation proposals been included in the BNG assessment / metric for the application?

#### The Applicant’s Response to ISH9 – Mitigation [REP8-111]

8. In relation to Action Point 29 the Examining Authority has asked the Applicant to provide a response to the JSC comments in REP6-101 item 4 identifying a range of documents / actions that JSC thought necessary. We provide comments in the table below relating to Action Point 29.

Ref	Text in Document	SCC Comment
TT1.4	Sensitivity testing – the 10% sensitivity test suggests that an increase in Airport-related traffic of this magnitude on a busy June day, for whatever reason, is unlikely to alter the overall conclusions reached in the TA.	SCC concerns with this work was that the analysis presented traffic impacts, there was no associated air quality and noise assessment.
TT1.14 and TT1.30	The outcomes of the post-Covid testing do not show that the SAC have failed. Although those tests indicate mode shares very slightly below the target figures, the tests did not alter the assumptions about interventions to be made under the SACs, including parking and forecourt charges, to influence prevailing travel behaviour conditions in	The response provided is contradictory. We both agree that those tests did <i>indicate mode shares very slightly below the target figures</i> , and SCC now know the reason, it being that <i>the tests did not alter the assumptions about interventions to be made under the SACs</i> .  The point being that in that instance the measures as modelled and representing SAC 5-12 were not adequate to meet the SAC 1-

	order to achieve mode share commitments.	4 targets. However, this demonstrates the importance in the SAC of measures such as funds and action plans to ensure that the targets are met.
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