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Gatwick Airport Northern Runway Project Consultation – Autumn 2021

The Sussex Wildlife Trust (SWT) welcomes the opportunity to submit comments on the Northern Runway Project (NRP) consultation. However, we are disappointed in the lack of previous consultation to date to allow us to be in a better position to assess the proposals. This is in contrast to other NSIPs effecting Sussex, where there has been engagement with relevant environmental stakeholders before official consultation on the Preliminary Environmental Information Report (PEIR).

In particular, it has taken a lot of time to understand what is proposed as part of the Development Consent Order (DCO) application, rather than development that is already committed to or does not need permission. This is still not clear. Additionally, there is very little information provided about some elements of the project, such as the relocation of the Central Area Recycling Enclosure (CARE) facilities. This makes it very difficult to assess all potential impacts.

Overall, the SWT **objects** to the NRP, as the proposal will result in increases in Greenhouse Gas emissions, contrary to Government policy and at a time when we should be doing everything we can to stop further emissions.

Climate Change and Carbon

Climate change is the biggest threat to biodiversity and as such, SWT objects to an increase in air travel at a time when we all need to take responsibility for drastically reducing carbon emissions.

There is a clear requirement for the Government to meet targets for reducing the UK's carbon emissions through the Climate Change Act 2008 to net zero by 2050. Therefore, SWT is concerned to see a consultation that seeks to facilitate increased numbers of flights, which will result in Greenhouse Gas (GHG) emissions from construction and proposed activities, both directly and indirectly contributing to global levels. We remind GAL that the Government's 2013 Aviation Policy sets out four main objectives, one of these is to ensure that the aviation sector makes a significant and cost effective contribution towards reducing global emissions.

By enabling growth, the NRP will lead to an increase in the number of flights and therefore to increased carbon emissions**.** Section 2.75 of the PEIR identifies that there will be higher overall GHG emissions as a result of the NRP, emissions that are considered to be 'significant' due to their permanent, cumulative nature. A significant increase of aviation emissions is noted at around 12%, which is contrary to the Government's legally binding ambition of carbon neutrality by 2050.

Although it was a stated ambition in the Gatwick Master Plan to reduce carbon emission per passenger, it is important to recognise that although consumption is proposed to reduce per passenger, the NRP will increase

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numbers of passengers using Gatwick Airport to 75.6 MPPA by 2038. We cannot see how this is compliant with current Government policy.

We acknowledge that the current consultation references the intention to produce a draft Carbon and Climate Change Action Plan as part of the DCO application, however, SWT feel that this fundamental information should be available for this consultation. We cannot currently scrutinise the viability of the potential commitments and actions alluded to by GAL to reduce GHG emissions caused by flights. Although much of what is mentioned in the PEIR appears untested, with no clear introduction date. A project like this must result in a reliable and significant reduction in GHG emissions before it can be deemed viable under current climate change policy.

Ecology and Nature Conservation

Overall, SWT is concerned by the lack of detail relating to impacts or how these will be avoided, mitigated, compensated and enhanced and therefore we are not convinced that this project will result in an overall benefit to biodiversity as required by policy.

The exact location of impacts and mitigation, compensation and enhancement is not at all clear, with areas overlapping each other on various figures. There are no figures relating to predicted habitat loss, although the descriptions within chapter 9 of the PEIR appear to indicate that these locations and amounts are known. It is also not clear what elements of the PEIR relate to the DCO application and what relates to other permitted or planned projects.

Without this information, there is insufficient evidence to demonstrate the significance of impact. Therefore, we believe the statement that '*The effects on habitats and species are generally found to be not significant*' in section 7.3.16 of the Non-Technical Summary is premature (taken from paragraphs 9.13.6 and 9.13.7 of the PEIR). We are particularly concerned about the impact of loss of habitat that will not be compensated for until the end of construction and take a long time to reach good condition e.g. woodland. The temporal loss in connectivity appears to be undervalued and more could be done to create new habitat in advance of loss.

The lack of detail also makes it difficult to view the proposals holistically and ensure they are future proofed. This is concerning given the possible future scenarios referred to in chapter 15, such as increasing the length of the runway to enable flights to take off under hotter temperature conditions (Table 15.9.2). Any compensatory habitat or enhancements should be provided in perpetuity and should not be at risk from future proposals or predicted climate change. Currently there are no monitoring proposals or outline plans for long-term management.

There is very little information on biodiversity enhancements provided in the PEIR, which is disappointing given the good work that GAL has done in achieving and maintaining the Biodiversity Benchmark. In particular, there is no discussion of biodiversity net gain, despite this being an emerging requirement of NSIPs in the Environment Act and a key goal of GAL's ambitious Decade of Change document.

If the NRP proceeds, GAL must commit to at least a 10% net gain in biodiversity in line with good practice. In particular, SWT believes more can be done to improve connectivity and enhance habitats adjacent to the project boundary, particularly along the watercourses and hedgerows. We would also like to see more ambition in relation to re-naturalising the watercourses and bringing forward significant nature based solutions, particularly climate resilience.

Although SWT objects to the NRP, if GAL moves forward with the proposal our comments above and our more detailed comments in Appendix A should be addressed.

Yours sincerely,

Jess Price
Conservation Officer

Appendix A – Detailed comments

No.	Document	Paragraph	Sussex Wildlife Trust Comment
1	PEIR, Chapter 9: Ecology and Nature Conservation	9.2.5	SWT disagrees with the summary of the NPPF in this paragraph. Government policy has significantly shifted away from no net loss to a requirement for Biodiversity Net Gain (BNG) both currently within the NPPF (paragraphs 174, 179 and 180) and in the Environment Act, including for NSIPs. We understand that there is a transition period for the BNG requirements in the Environment Act. However, given the long lead in time for this proposal, we believe GAL should be planning to deliver a minimum of 10% BNG. This is in line with GAL's Decade of Change goal of having '*a sector-leading 'net gain' approach to protecting and enhancing biodiversity and habitats on the airport estate, including zero use of pesticides by 2030; and support biodiversity partnerships in our region*' There is reference to biodiversity offsetting in Table 9.2.1, but it is not clear what this means. Is it BNG i.e. additional, or compensation?
2	PEIR, Chapter 9: Ecology and Nature Conservation	Table 9.2.1	We do not think it is sufficient that '*Where practicable, opportunities to enhance the Project site for the benefit of biodiversity have been included in the design of the Project*'. All the enhancements seem to be focused within the development footprint rather than as part of the wider ecological network. There are opportunities to improve habitat connectivity and function beyond the airport boundary that should be considered, particularly for linear habitats such as the River Mole, Gatwick Stream and hedgerows. We do not believe that the enhancements proposed are sufficient even before considering delivery of biodiversity net gain.
3	PEIR, Chapter 9: Ecology and Nature Conservation	9.2.15	It should be acknowledged that the requirement for net gain for NSIPs is now enacted through the Environment Act. Although there is a transition period, we would expect GAL to deliver a minimum 10% net gain through this project.
4	PEIR, Chapter 9: Ecology and Nature Conservation	9.4.6	SWT is concerned that for the majority of surveys, the study area was the Project site boundary. The details of mitigation, compensation and especially BNG are vague and still in development, however given the constrained nature of the project boundary we feel it is likely that some delivery will need to be outside this boundary. Surveys of the surrounding area should be undertaken to inform mitigation, enhancement and BNG opportunities.

5	PEIR, Chapter 9: Ecology and Nature Conservation	9.4.11	The PEIR states that '*it is recognised that effects on ecological receptors can occur beyond such limits, especially for mobile species such as bats and birds*'. However, paragraphs 9.4.37 and 9.4.38 state that wintering and breeding bird surveys were undertaken within the Project site boundary only. This is a contradiction and needs to be justified. As stated above, SWT believe many of the surveys should extend past the project site boundary.
6	PEIR, Chapter 9: Ecology and Nature Conservation	9.6.12 – 9.6.13	SWT works through the Gatwick Greenspace Partnership (GGP) to help manage the BAP areas within the airport and maintain the Biodiversity Benchmark award. Any enhancements and net gain delivered through the NRP must be truly additional to any work likely to be delivered through the existing BAP. However, any mitigation/enhancements should also complement and connect to this existing work. We encourage GAL to incorporate any new enhancement areas into the BAP to ensure long-term positive management. This should include the River Mole realignment area, which we note is not included as a 'potential environmental mitigation and enhancement area' on figure 5.2.1g. This should also include the other flood compensation areas mapped on figure 5.2.1e which could also provide good biodiversity enhancements if designed well. We appreciate that biodiversity enhancements in these areas are referenced in Table 9.8.1, however it is not clear which elements constitute true enhancements and what is mitigation or compensation for loss of habitat elsewhere and/or impacts on species.
7	PEIR, Chapter 9: Ecology and Nature Conservation	Table 9.6.3	SWT is aware that nightingale was recorded singing within the airport in 2021 in two separate locations. GAL should update surveys with records collected by the GAL Biodiversity Advisor since the site surveys were undertaken.
8	PEIR, Chapter 9: Ecology and Nature Conservation	Table 9.6.5	Justifications should be provided for the values given for each Important Ecological Feature in this table. For example, given that Ancient Woodland is an irreplaceable habitat highly protected through national policy, we question its value being listed as only Regional. Similarly, it is not clear why Breeding bird assemblage is of County value, whilst Wintering birds is only Local. Both features include Section 41 species and BoCC Red or Amber listed species. European protected species are protected due to their international declines and therefore we have a national duty to conserve UK populations, we do not believe that EPS should be of only local value. The designation information for dormouse relates to otters, not dormouse - this needs correcting. Given that the Shining ramshorn snail is ICUN red listed; it should have higher value than local.

9	PEIR, Chapter 9: Ecology and Nature Conservation	9.6.142	The Future Baseline should also consider that positive work through the BAP is likely to continue regardless of this proposal progressing, especially given GAL's Decade of Change goal of having '*a sector-leading 'net gain' approach to protecting and enhancing biodiversity and habitats on the airport estate, including zero use of pesticides by 2030; and support biodiversity partnerships in our region*'.
10	PEIR, Chapter 9: Ecology and Nature Conservation	9.6.143	If biodiversity mitigation and enhancements required/committed to for the improvements listed in this section are included in the ES, these should be clearly set out, separately to anything relating to the application proposal.
11	PEIR, Chapter 9: Ecology and Nature Conservation	Table 9.8.1	SWT would like to see more enhancement and net gain options presented, especially outside of the airport boundary. For example, there are no mitigation or enhancement areas identified to the south of the runway or close to the LERL BAP area. We would expect there to be potential enhancement opportunities along the Gatwick Stream, particularly in terms of connectivity through to Grattons Park LNR. We encourage GAL to present a range of enhancement and net gain options in more detail and to make clear exactly which elements of the project are additional, and which are mitigation or compensation for adverse impacts.
12	PEIR, Chapter 9: Ecology and Nature Conservation	Table 9.8.1	The monitoring only relates to species, rather than habitats. It is not clear why as remedial action may be required for habitat creation schemes.
13	PEIR, Chapter 9: Ecology and Nature Conservation	Table 9.8.1	GAL should consider opportunities for natural regeneration of woodland, along with planting. Where planting occurs, we alternatives to plastic tree guards should be used.
14	PEIR, Chapter 9: Ecology and Nature Conservation	Table 9.8.1 and 9.9.1	SWT is concerned that 'where practicable' is used in several sections of this chapter when relating to avoiding high value habitats and species. We expect the ES to set out clearly exactly what adverse impacts on biodiversity are likely to occur throughout the delivery of the proposal, and how this will be avoided and mitigated, as required by the mitigation hierarchy.
15	PEIR, Chapter 9: Ecology and Nature Conservation	9.9.13	We would like the ES to confirm that the diversion of the River Mole corridor would not have any adverse impact on the hydrology of the ancient woodland. This is not referred to in the PEIR.

16	PEIR, Chapter 9: Ecology and Nature Conservation	9.9.25	SWT believe it is premature to assign significance to the permanent loss of mature broadleaf woodland. The ES must set out the amount and location of loss, along with where this will be compensated and the amount of residual loss. We would expect this loss to be included in any calculation of biodiversity net gain. If it is not possible to compensate fully for the loss on site, then offsite strategic options should be considered.
17	PEIR, Chapter 9: Ecology and Nature Conservation	9.9.33 – 9.9.42	SWT supports the re-naturalisation of the River Mole; however, we hoped that GAL would be more ambitious in its commitments to biodiversity and plan for the diversion of the river away from the airport, removing the section that is currently culverted under the runway. We encourage GAL to develop long-term plans for this River to benefit biodiversity and to create more resilience to future pressures, particularly climate change. We question whether committing resources for this small section of the river only will undermine future plans for the wider River. We would also support nature-based interventions to Crawters Brook and the Gatwick Stream, which are referenced very little in this chapter. We need clarity as to how the airfield satellite contractor compound relates to the river diversion. Chapter 4 states that the diversion will be completed in 2025, but the compound will be maintained until 2035. In Figures 5.2.1e and 5.2.1f, the two areas overlap.
18	PEIR, Chapter 9: Ecology and Nature Conservation	9.9.44 – 9.9.45	It is not clear why only one of the replacement ponds mentioned in this section, will be created for wildlife. Any new ponds created through the project should be designed to benefit wildlife.
19	PEIR, Chapter 9: Ecology and Nature Conservation	9.9.62	We question the reliability of the long-term protection of the compensatory habitat given that what is being lost was planted 60 years ago to compensate for the road creation. There appears to be no guarantee that this compensatory habitat will not be destroyed in the future through further development and growth within the airport. Additional broadleaf woodland must be create to increase the resilience of this habitat to future changes.
20	PEIR, Chapter 9: Ecology and Nature Conservation	9.9.76	Would the amount of breeding habitat be more than what has been lost? It is not clear why the impact is long-term low adverse? Any habitat creation should be more than what is lost as a basic principle, especially given the time lag between creation and use by breeding birds. It is also not clear where this habitat will be lost. Is this in relation to Riverside Garden Park? If so, more weight should be given to reducing the site of this wildlife feature given it is completely surrounded by urbanising impacts

			(housing and roads). Maps should be provided to show where permanent habitat loss is occurring across the site.
21	PEIR, Chapter 9: Ecology and Nature Conservation	9.9.87	Again, there must be more details on the amount of habitat lost and compensated for. Currently there is no justification for generic statements such as 'substantial areas of habitat would be retained'.
22	PEIR, Chapter 9: Ecology and Nature Conservation	9.9.111 and 9.9.137	SWT questions whether a 15 meter buffer to the south of Brockley Wood is sufficient. We are very concerned that the impact to bats in this location has not been fully explored as no transect appears to have been undertaken in this area. We do note that Bechstein's roosts were located in Brockley Wood and that there were a large number of bats recorded in the area using the static detectors. It is likely that the marshy grassland in this area is an important feeding area for bats and therefore its value has not been sufficiently assessed. Clarity is required as to how the habitat creation through the River realignment will physically relate to Brockley Wood when it appears that the airside satellite contractor compound will remain between the two areas until 2035.
23	PEIR, Chapter 9: Ecology and Nature Conservation	Appendix 9.9.1	It is not clear if the assessment of nitrogen deposition includes increased nitrogen from an increased number of flights. This should be addressed.