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**By email only**
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Gatwick Northern Runway Project
Gatwick Highway Improvements and Project Updates Consultation

As stated in our response to the Autumn 2021 consultation, the Sussex Wildlife Trust (SWT) **objects** to the Northern Runway Project (NRP), as the proposal will result in increases in Greenhouse Gas (GHG) emissions at a time when we should be doing everything we can to stop further emissions.

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. It seems that there are no concrete proposals from GAL to demonstrate how a large increase in flights facilitated by the NRP will allow the reliable and significant reduction in GHG emissions required.

1. What are your views on our updated road improvement proposals?

The consultation document acknowledges that there will be 'considerable loss of vegetation from within the highway boundary' (2.3.11) and other modifications to an existing pond, habitats within Church Meadow and habitats within the River Mole floodplain. However, overall the consultation concludes that there are no new or materially different significant effects from those set out in the Autumn 2021 consultation.

SWT concern is that the 2021 consultation lacked detail relating to impacts on ecology or how these will be avoided, mitigated, compensated and enhanced. It is still not clear what the exact location of impacts are, what the existing quality of the habitats are or what amount will be lost or impacted. SWT therefore has no confidence in the conclusions on significant effects in the original PEIR or the comparisons in Appendix 4 of this consultation document. It is frustrating that no more ecological information is provided in this consultation, despite detailed comments being provided in Autumn 2021.

2. What are your views on our car parking proposals, including for additional on-airport spaces to assist with reducing existing off-airport unauthorised spaces?

SWT supports the Sustainable Transport Hierarchy of reducing the need to travel, improving public transport and active travel routes and promoting less carbon-intensive forms of transport.



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We are therefore concerned about the level of additional car parking spaces being provided and particularly the impact all these travellers will have on GHG emissions.

3. What are your views on our Project updates? Please specify the topics to which your comments refer.

Water Management

We are concerned about the impacts that the reduction in size and removal of Flood Compensation Areas (FCA) may have on the overall ecological benefits of the proposal (section 3.6.3). Any FCA should be designed as new, naturally functioning wetland areas to benefit biodiversity. As there is currently no detail provided on habitat impacts, it is not clear if the removal of the FCA will have an impact on the amount of habitat creation proposed in the project. We ask GAL if the Environment Agency are supportive of the removal of these FCAs? SWT believes GAL should consider what nature-based enhancements could be made to the Gatwick Stream and Museum Field to provide multiple benefits, rather than just providing the bear minimum.

Similarly, SWT are still concerned about the impacts of the proposal on the River Mole (section 3.6.4). As stated in our Autumn 2021 response, SWT hopes that GAL would be more ambitious in its commitments to biodiversity and plan for the diversion of the River Mole away from the airport, rather than culverting more of it. GAL should be developing long-term plans for this River to benefit biodiversity and to create more resilience to future pressures, particularly climate change.

Ecology

Whilst SWT objects to the NRP, we would be willing to attend a Biodiversity Working Group (section 3.7.6). However, we are very concerned about the last minute nature of this proposal. For all other NSIPs SWT has worked on, stakeholder groups were set up months in advance of any statutory consultation, so that meaningful input could be given that influenced the project design, including ecological data collection. GAL must allow proper input from stakeholders before any DCO application is made.

SWT is also extremely disappointed that GAL is still not committing to delivering a minimum of 10% Biodiversity Net Gain (section 3.7.4). This is clearly contrary to its own Decade of Change goal of having a 'sector leading net gain approach' and is not acceptable given the policy direction set out in the Environment Act. By contrast, the Arundel Bypass NSIP will be delivering a 10% measurable net gain in biodiversity, with an overall aspiration of delivering 24% BNG, despite the DCO application likely being submitted before the NSIP BNG regime is confirmed.

As stated in question one, SWT is still very concerned by the lack of detailed relating to impacts on ecology. We again request that GAL clearly sets out the location, type and severity of habitat impacts, along with proposals for mitigation, compensation and enhancement. This should include the types, quality and quantity of habitats impacted both directly and indirectly. There must also be consideration of temporal impacts, particularly when it comes to habitat connectivity. Currently there is insufficient evidence to demonstrate the significance of impacts.

The concept designs in this consultation show little detail and only cover small areas of habitats. SWT believes much more should be done to improve connectivity and enhance habitats both within and adjacent to the project boundary, particularly along the watercourses and hedgerows. The current proposals are piecemeal and it is not clear that they will be provided in perpetuity. This must be addressed.

Carbon

SWT fundamentally disagrees with the statement in 3.8.8 that to a large extent, emissions from aircraft are outside GAL's control. Expanding aviation at Gatwick to enable more flights is directly in GAL's control and will result in increased carbon emissions. This is not compatible with the UK's legally binding net zero targets. The Climate Change Committee's Sixth Carbon Budget Policy Report clearly states that 'there should be no net expansion of UK airport capacity unless the sector is on track to sufficiently outperform its net emissions trajectory'. We see no evidence that this is a likely outcome.

It is clear by the tone of sections 3.8.15 and 3.8.16 of the consultation document, that GAL is aware that Jet Zero will not produce the reductions in emissions required to meet our climate change commitments. It is extremely short-sighted to assume that GAL will be able to adapt to any further measures imposed by Government in the future. It appears that GAL has no clear plan to significantly and reliably reduce GHG emissions and as such, SWT believe that the NRP should not progress.

Yours sincerely

Jess Price
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Sussex Wildlife Trust