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By e-mail.

3rd February 2015

Dear Madam or Sir,

AIRPORTS COMMISSION CONSULTATION: INCREASING THE UK'S LONG-TERM AVIATION CAPACITY

London Wildlife Trust's response to the above consultation is attached.

London Wildlife Trust is a nature conservation charity that has been working for over 33 years to secure a Greater London rich in wildlife, that can help make the capital a better place to live, work and play. Our work is supported by over 14,000 members, volunteers, and numerous other supporters who care about protecting wildlife. We take practical action to protect wildlife, conserve biodiversity and connect people with the natural world in London – not only on our 40 nature reserves, but also in parks, housing estates and gardens. Our vision is of a living landscape, where we work with others to restore, recreate and reconnect wildlife-rich places across the city, to create a dynamic and functioning ecological network for the benefit of people and wildlife.

We are one of 47 Wildlife Trusts nationwide. In respect of the Airports Commission Consultation (the Consultation) we have liaised with the respective Wildlife Trusts relevant to the three proposals; Berks, Bucks & Oxon WT, Herts & Middlesex WT, Surrey WT, and Sussex WT. Each will be making a response appropriate to their concerns. Whilst there are some generic concerns applicable to the consultation material, London Wildlife Trust's concerns in particular relate to the two Heathrow Airport proposals: North-west Runway, and Extended Northern Runway.

London Wildlife Trust's position is that the demand for air travel should be managed down, and that there is no demonstrable case for expansion of air traffic in the UK. The cases for expansion are driven by demand rather than need. However, the Trust recognises that air transport is currently a contributor to London's economy, albeit with significant adverse environmental impacts.

With this in mind, proposals for airport expansion cannot be set out on economic benefits alone; they need to be developed alongside environmental principles, within appropriate constraints, and seek to secure benefits for biodiversity (and other environmental factors) wherever possible. This is in line with the objectives of the Natural Environment White Paper (2011), and the aspirations of the England Biodiversity Strategy (2011). Objectives of both include moving from net biodiversity loss to net gain; supporting (and helping to create) healthy, functioning ecosystems; and establishing coherent, resilient ecological networks.

This is also captured within national planning policy. Paragraph 109 of the National Planning Policy Framework (NPPF, 2012) sets out that the planning system should "*contribute to and*

Protecting London's Wildlife for the future

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enhance the natural and local environment by... minimising impacts on biodiversity and providing net gains in biodiversity where possible... including by establishing coherent ecological networks that are more resilient to current and future pressures.”

The Trust currently has a positive and productive relationship with Heathrow Airport, not only as landowner adjacent to their land-holdings on the eastern boundary of the airport, but also as a partner on the Crane Valley Partnership.

Our comments on the Consultation are based on the information available in the Airports Commission’s consultation documents and on the scheme information to date. As a broad summary and on the basis of the information provided, our response concludes:

- The Airports Commission has effectively relegated the majority of potential environmental impacts of all options – and in particular potential impacts on the natural environment, including the implications of the development options on Natura 2000 sites, SSSIs, Local Wildlife Sites, ancient woodlands, key species and on ecological corridors – to issues of minor importance. Such matters – including the important legal obligation to undertake Habitats Regulations Assessments ***in advance of decisions on development*** - may have been recognised in the supporting documentation, but are deferred for later consideration once a decision is taken on the preferred development option or options. This is contrary to sustainable development principles.
- The Commission has failed to take proper account of the likely impacts of accompanying development, and in particular housing, that would arise as a direct consequence of any of the three options. We believe that this is likely to further compound the damage to the natural environment, both in direct land-take and accumulative indirect impacts on existing ecological infrastructure.
- The mapping of information on the biodiversity assets which could be affected is inadequate to make realistic appraisal of likely impacts of any of the development options.
- The Commission’s sustainability assessments (and summary consultation documentation) focus on the business case for each of the proposals, with limited information set out in the biodiversity and landscape sections. These further reinforce our view that the environmental impacts of each scheme are not seriously considered.
- The Commission has failed to make an adequate assessment of the potential impacts of the development options in relation to flood risk and obligations of the Water Framework Directive.
- London Wildlife Trust generally concurs with the assessment of direct impacts on designated sites and landscapes, priority habitats and ancient woodland for the two proposals. However uncertainties remain regarding a number of direct and indirect impacts, including:
 - a. the impact of increased bird control activities on the South West London Waterbodies Special Protection Area and Ramsar site (SWLW SPA/Ramsar) and on mitigation proposals;
 - b. the direct and indirect impacts on Staines Moor SSSI and the suggested mitigation relating to diversions of the River Colne;
 - c. impacts on protected landscapes from increased overflying;
 - d. impacts from accompanying development.

These need to be reflected in the Airports Commission's final recommendations to Government; they indicate the need for a precautionary approach to the final sustainability assessment scores given to the environmental topics.

- We welcome the acknowledgement that an Appropriate Assessment (AA) will be required to determine the impact of increased bird control activities on the SWLW SPA/Ramsar from both Heathrow proposals. However, we also recommend that the impacts of increased bird disturbance from increased overflying of the SPA and its supporting waterbodies is also included in the Appropriate Assessment. Also that for the North-west Runway scheme, the impact of the loss of 8ha from Old Slade Lake Local Wildlife Site (which provides functional habitat supporting the SPA) must either be clearly addressed by the mitigation proposals or included in the AA.
- We would welcome proposals that clearly demonstrate the avoidance and minimisation of impacts on designated sites and landscapes, non-statutory sites (Local Wildlife Sites), priority habitats, key species populations, and ancient woodland.
- The promoters' mitigation proposals should seek to achieve a net gain for biodiversity. Further work is required from the scheme promoters on their mitigation strategies, to ensure that a landscape scale approach to enhancing connectivity between existing sites and habitats is applied; that local opportunities to secure effective long term management of existing sites of ecological interest and potential are maximised; and that local/regional partnerships (for example the Colne Valley Park CIC, Crane Valley Partnership) already planning and delivering environmental gains on the ground are included in the scoping and delivery of the mitigation strategies to ensure effective integration.
- Given the significant and extensive impacts on watercourses and flood risk for each of the options, we support the Environment Agency's advice that there is the risk of infraction proceedings if their advice regarding the Water Framework Directive and water-based mitigation is not undertaken.
- We welcome the Airports Commission's commitment to undertake further air quality dispersion modelling. We recommend including wildlife sites that may be sensitive to air quality changes beyond the 5km buffer if they are within 200m of a road that will experience significant traffic increases as a result of the construction and operation of the proposals.
- We welcome the Commission's Ecosystems Services Assessment (ESA) to inform decision-making regarding the three options. However, the current ESA is lacking a key stage; it does not present a thorough assessment of the impact on the ecosystem services from the habitat losses outlined before undertaking the monetary valuation stage; we recommend the Commission to further refine the ESA, and build in a more detailed assessment of the impacts into the valuation work.



AIRPORTS COMMISSION CONSULTATION;

Response from London Wildlife Trust, February 2015

Q1: What conclusions, if any, do you draw in respect of the three short-listed options? In answering this question please take into account the Commission's consultation documents and any other information you consider relevant.

Heathrow North-west Runway (NWR)

Designated sites

Jacobs' conclusion that direct land take from internationally and nationally designated sites can be avoided by the NWR proposals is dependent on the alignment of surface access routes along the M25 corridor being designed and constructed to ensure no direct impacts on Staines Moor SSSI and Wraysbury Reservoir SSSI (and therefore on the South West London Waterbodies SPA and Ramsar site (SWLW SPA/Ramsar), of which Wraysbury Reservoir SSSI is a component).

There is the potential for indirect impacts on a number of internationally and nationally designated sites. Wraysbury Reservoir SSSI and Staines Moor SSSI are within 2km of the scheme boundary. The promoter has identified that there is the potential for significant impacts to the Staines Moor SSSI due to changes to the River Colne, on which the alluvial meadows, for which the SSSI is in-part designated, depend. Mitigation will be crucial to avoid adverse impacts on the SSSI.

Regarding the potential impact on this SPA, the biodiversity assessment highlights that the NWR will move the airport boundary closer to the Queen Mother Reservoir (which provides functional support to the SPA) and may require increased bird control measures on the Reservoir. We welcome the acknowledgement of uncertainty regarding the impacts of increased bird strike control measures on gadwall and shoveler using the Queen Mother Reservoir, and the need for Appropriate Assessment under the Habitats Regulations to determine the effect on the SPA, should the NWR option proceed. We agree with Jacobs' conclusion that *"Further work is therefore needed to determine the arrival directions and flight altitude of birds using Queen Mother Reservoir in particular, and the reservoirs to the west of Heathrow in general, so that the likely additional risk can be properly assessed."*¹

A significant degree of uncertainty remains as to the possibility of likely significant effect (LSE) on SPA bird populations from increased overflying as a result of the NWR proposals, especially given the uncertainties regarding exact flight paths and heights of the NWR proposals over both SPA and its functional habitat. We disagree with Jacob's conclusion that increased noise/overflying is unlikely to impact on the gadwall and shoveler populations for which the SPA is designated (concludes negligible impact) due to habituation. Even if impacts from increased overflying can be shown not to have LSE on the SPA, there may be other impacts that should be assessed in combination with increased overflying. We recommend that impacts from increased overflying is assessed in addition to impacts from increased bird control activities in the Appropriate Assessment.

The impact on the SPA from the loss of the Old Slade Lakes Local Wildlife Site (LWS), which also provides functional support to the SPA, should also be assessed and addressed through the promoter's mitigation strategy to ensure no likely significant effect on the SPA. We agree with the conclusion that bird strike control requirements are likely to have a significant influence on the type and function of habitats created as mitigation for the scheme

¹ 2.2.4, *Airports Commission, Biodiversity Assessment*, November 2014

proposals, and that habitat creation areas identified to the west and north of the airport expansion are likely to be subject to birdstrike management measures that may mean they cannot be regarded as mitigation for impacts on the SPA. We recommend that the Commission seeks assurance that the mitigation strategy is robust enough to provide mitigation for the loss of Old Slade Lakes within the constraints of bird control management requirements.

We acknowledge Jacobs' figures regarding direct losses of priority habitats; the NWR scheme involves direct land take impacts on three local non-statutory designated sites (51ha from Lower Colne Site of Metropolitan Importance for Nature Conservation (SMI), 8ha from Old Slade Lake Local Wildlife Site (LWS), and 6ha from Stanwell II Site of Nature Conservation Importance), and would result in losses of priority habitats including approximately 57.3ha of mixed deciduous woodland, 2.85ha traditional orchard, 12.3km of river, and 9.2ha lowland meadows (including land take for additional surface access).

Given the proposed culverting and diverting of sections of watercourses in the River Colne valley, which will be required as mitigation for resultant biodiversity losses, there are opportunities for biodiversity enhancement measures (in line with NPPF, para 109). We support any increase in the proposed habitat creation/habitat loss ratios proposed by Jacobs.

Protected species

We agree with the conclusion that further site-specific assessment is required to understand the impact on pennyroyal (nationally rare protected plant) in the Lower Colne SMI. We note the presence of key protected species including bats, water vole, reptiles (including grass snake and slow-worm), and various species of birds within 2km of the scheme boundary. Impacts on EPS and other nationally protected species will need to be fully addressed through scheme design and mitigation and through the licensing process, should licenses be required. At this high level assessment stage, the principal supporting Jacob's proposal to add a 10% mitigation allowance would benefit from further explanation.

Water quality

The biodiversity assessment and Sustainability Assessment for the NWR highlight the hydrological dependency of the Staines Moor SSSI alluvial meadows on the River Colne. We acknowledge the promoter's conclusion that SSSI impacts will be avoided through the design of channel diversions, minimising culverting requirements, and maintaining flow regimes. However, this will require further detailed modelling and design work before the effectiveness of these measures can be assessed. We recommend that both promoters undertake further work to inform the Commission's understanding as to the design and deliverability of such mitigation.

Heathrow Extended Northern Runway (ENR)

Designated sites

We concur with Jacobs' conclusion that there will be direct impact due to land take from the Staines Moor SSSI from the ENR proposals.

We also acknowledge the potential for indirect impacts on Staines Moor SSSI (Unit 12) from works affecting the River Colne, and Heathrow Hub's worst case scenario that this could lead to the loss of 40ha of the SSSI. As with the NWR proposals, mitigation will be crucial to avoid this additional and severe impact on the SSSI; we recommend that both promoters undertake further work to inform the Commission's understanding as to the design and deliverability of such mitigation.

We also acknowledge the proposed works, including a balancing pond, adjacent to King George VI Reservoir (part of Staines Moor SSSI and SWLW SPA) and nearby Wraysbury Reservoir (also part of the SWLW SPA). However, the impacts on the SSSI/SPA from construction and operation should be avoided and screened out via appropriate timings of works.

There appears to be the potential for further impacts on the SSSI that are not reflected in Table 2.9 (summarising the impacts of the ENR). The biodiversity assessment module states that *“Jacobs has identified that surface access proposals for the scheme involve potential impacts due to land take and disturbance in the southern area of the proposal, primarily along the existing M25 motorway corridor and across Staines Moor SSSI. Using the buffer zone of 100m as a potential area of impact around the proposed surface access routes has identified some potential overlap with the boundaries of Wraysbury Reservoir SSSI, King George VI Reservoir and Staines Reservoirs (and therefore the SWLW SPA). It is considered likely that during subsequent design stages the exact alignment of the surface access routes and the construction methods to be used would be planned to avoid land take within the SPA. Adverse impacts to Staines Moor SSSI and the River Colne due to current Surface Access proposals are likely to be highly significant.”*² It appears that there is the potential for further direct land take due to new southern access road through Units 12 and 13 on the western side of Staines Moor SSSI, or alternate dualling of A3044 road which runs between units 7 and 8 of the SSSI (which are also part of the SWLWB SPA). This requires further clarification.

The ENR moves the airport boundary much closer to the SWLW SPA/Ramsar, principally to the Wraysbury Reservoir which is part of the SPA and to the Queen Mother Reservoir (QMR), Horton and Kingsmead Lakes, which provide functional support to the SPA. We agree with the observation in the biodiversity assessment module that if *“overflying aircraft (as a result of the proposed scheme) were to have a disturbance effect on waterbird populations, it is therefore reasonable to assume that this effect would be most acute at the Queen Mother Reservoir and Wraysbury Reservoir, but also potentially evident at Horton Gravel Pits and perhaps the Kingsmead Gravel Pits.”*³

However, we would dispute the conclusion that as the QMR and Wraysbury reservoirs *“are concrete-lined, supporting a negligible resource of marginal plant habitat”* they are *“of little value to gadwall and shoveler”* and that *“the potential for effects on the SPA deriving from these two closest waterbodies is therefore unlikely.”* The Walthamstow Reservoirs are also concrete-lined, and support internationally important wintering populations of gadwall and shoveler. Birds need sanctuary areas to rest, not just for feeding, and the Wraysbury Reservoir is part of the SPA. Bird numbers will fluctuate annually. We recommend that the possibility of increased disturbance to gadwall and shoveler from increased overflying is investigated further should the scheme proceed.

In respect of the impacts on the SPA from increased bird control requirements, we agree with the conclusion that an Appropriate Assessment under the Habitat Regulations will be required to assess these impacts. The biodiversity assessment module wrongly concludes that *“... scaring of non-target birds at Queen Mother Reservoir (which is not part of the SWLW SPA) and Wraysbury Reservoir (which is part of the SWLW SPA) is not likely to have a significant impact on gadwall or shoveler numbers given the very low numbers at/importance of these particular waterbodies to these birds.”*⁴ However, any increase in bird scaring at any of the waterbodies within the SPA (or those providing functional support to the

² p37, Biodiversity assessment module (Nov 2014)

³ p35, Biodiversity assessment module (Nov 2014)

⁴ p42 Biodiversity assessment module (Nov 2014)

SPA) is likely to have a likely significant effect on the SPA and thus require Appropriate Assessment.

We suggest that further work is needed to determine the arrival directions and flight altitude of birds using the QMR in particular, and the reservoirs to the west of Heathrow in general, so that the likely additional risk can be properly assessed.

Priority habitats

We acknowledge Jacob's figures regarding direct losses of priority habitats; direct land take from Staines Moor SSSI (8.74ha, with potential for more from surface access requirements), 10-15ha from Lower Colne SMI, 4.1ha from Arthur Jacob LNR, 2.9ha from East Poyle Meadows SNCI, 1.25ha from the River Colne (from Greater London boundary to Staines Moor), and 0.45ha from Greenham's Fishing Pond SINC. It would also result in losses of priority habitats including approximately 56.3ha of deciduous woodland, 0.5ha traditional orchard, 10.4km of rivers and brooks, 8.3ha of reedbeds and 38.9ha lowland meadows (including land take for additional surface access). We recommend that a 2:1 minimum ratio for compensation should be achieved by the promoters; if not more.

Protected species

We acknowledge the presence of key protected species including bats, water vole, reptiles (including grass snake and slow-worm), and various species of birds within 2km of the scheme boundary. Impacts on European protected species and other nationally protected species will need to be fully addressed through scheme design and mitigation (and through the licensing process, should licenses be required). The principal supporting Jacob's proposal to add a 10% mitigation allowance would benefit from further explanation.

Jacobs have added an estimated loss of 10-15ha of the Lower Colne SMI to the promoter's figures on the basis that "*The scheme would cross the Lower Colne SMINC affecting the entire site south of Bath Road and a small area above it. The exact extent of the impact would depend on final road realignments, however the impact is estimated to be between 10-15ha.*"⁵ Impacts on pennyroyal should therefore also be factored into the assessment of impacts for the ENR.

The River Colne also supports some of the last remaining populations of water vole, and the ambition of the London (and local) Biodiversity Action Plan is to strengthen and extend their distribution in the Colne catchment. Any mitigation should seek to contribute towards this objective.

⁵ p37 Biodiversity assessment module (Nov2014)

Q2: Do you have any suggestions for how the short-listed options could be improved, i.e. their benefits enhanced or negative impacts mitigated? The options and their impacts are summarised in section three.

The preferred option must seek to deliver a net gain for biodiversity in keeping with the NPPF and the aims of the Biodiversity 2020 strategy.

We welcome the recognition that bird strike control measures are likely to have a significant impact on the design and location of ecological mitigation measures for all options, and that there is uncertainty in regard to Heathrow as to how this will affect the design and deliverability of final mitigation plans for both options. Further work from each promoter on how they will deliver ecological mitigation within the constraints of their bird control requirements would strengthen the current mitigation proposals. This may require establishing appropriate mitigation beyond the airport boundary.

The timing and location of habitat creation will be essential in mitigating habitats, species and landscape impacts. In many instances, it will be important to establish habitat creation for mitigation and/or compensation well in advance of habitat damage or losses occurring. A landscape scale approach to enhancing connectivity between existing sites and habitats should be applied, for example in line with the Trust's Crane Valley and Colne Valley Living Landscapes, and/or the aspirations of the All London Green Grid.

Better baselines and on-going monitoring of a number of key issues (e.g. bird populations and flight paths within and around key protected sites and the airport, water vole and pennyroyal populations in the Colne) will ensure that mitigation strategies are fit for purpose.

There are also opportunities for enhancements over and above mitigation and for delivering exemplary practice in terms of sustainable design and construction and innovative environmental good practice. For example, London has led a renaissance on green roofs to benefit biodiversity (amongst many environmental benefits) over the past 15 years, and we'd expect such measures to be embedded in any structures developed. These will also apply to surface water management techniques, addressed through SWMPs and the objectives of Drain London.⁶ With the right design and use of targeted bird dispersion there may be opportunities for piloting new designs that are more wildlife and habitat friendly.

Local opportunities to secure effective long term management of existing sites should be maximised and local/regional partnerships already planning and delivering environmental wins on the ground should be included in the scoping and delivery of the mitigation strategies to ensure join up. These could include the partnerships with which London Wildlife Trust is already actively engaged, for example Colne Valley Park CIC, and the Crane Valley Partnership (of which Heathrow Airport Limited is a partner).

Heathrow Extended Northern Runway (ENR)

There may be further opportunities for remedial works on Staines Moor SSSI, reconnecting the river with the floodplain as compensation for the loss of Poyle Meadow.

⁶ www.london.gov.uk/priorities/environment/looking-after-londons-water/drain-london

Q3: Do you have any comments on how the Commission has carried out its appraisal?

The Commission's sustainability assessments (and summary consultation documentation) focus on the business case for each of the proposals, with limited information set out in the biodiversity and landscape sections. These further reinforce our view that the environmental impacts of each scheme are not seriously considered.

Q4: In your view, are there any relevant factors that have not been fully addressed by the Commission to date?

The likely impacts of accompanying development, and in particular housing, that would arise as a direct consequence of any of the options.

Q5: Do you have any comments on how the Commission has carried out its appraisal of specific topics (as defined by the Commission's 16 appraisal modules), including methodology and results?

Biodiversity module

We largely support the appraisal, methodology and results of the biodiversity and landscape (as a part of the place) modules, although there are some errors:

- Kempton Park Reservoir SSSI should be identified as part of the SWLW SPA/Ramsar. In the biodiversity baseline (p22); the same applies to Table 4.1 where a number of SSSIs are not identified as part of SWLW SPA/Ramsar.
- Section 2.2.4 of the biodiversity assessment module states "*As for noise effects, scaring of non-target birds at Queen Mother Reservoir and Wraysbury Reservoir is not likely to have a significant impact on gadwall or shoveler numbers given the very low numbers at/importance of these particular waterbodies to these birds.*" Scaring of non-target birds could have a likely significant effect on the SPA/Ramsar (includes Wraysbury together with the functionally supporting QMR) and would need to be assessed accordingly. This also applies to the analysis in 2.3.2 which identifies Horton and Kingsmead Lakes as functional habitat but appears to dismiss the QMR and Wraysbury Reservoir as insignificant.

Biodiversity Ecosystem Services

We support the Commission's commitment to undertaking an Ecosystems Services Assessment (ESA) to inform decision making regarding all runway options. The current ESA is lacking a key stage; it does not present a thorough assessment of the impact on the ecosystem services from the habitat losses outlined before undertaking the monetary valuation stage; on this basis we would urge the Commission to further refine the ESA, building in a more detailed assessment of the impacts into the valuation work.

Although this is a high level assessment, there is still a need to incorporate ecosystem services assessments at the start of the impact assessment process (also helping to ensure that appropriate data is collected to inform the ESA). Ideally collection of data would also involve local beneficiaries, to enable the collection of detailed data on ecosystem services, to inform the assessment. The NEA follow-on work on tools includes consideration of how the ecosystem service framework can be incorporated within existing impact assessments.

The importance of ecosystem processes and function and the supporting services is not acknowledged in the report; an understanding of the impacts on ecosystem processes, function and the supporting services is needed to understand impacts on final services.