

APP/L2250/V/10/2131934 & APP/L2250/V/10/2131936

SECTION 77 TOWN AND COUNTRY PLANNING ACT 1990 – REFERENCE OF APPLICATIONS TO
THE SECRETARY OF STATE FOR COMMUNITIES AND LOCAL GOVERNMENT

TOWN AND COUNTRY PLANNING (INQUIRIES PROCEDURE) (ENGLAND) RULES 2000

**SUMMARY PROOF OF EVIDENCE OF DR. MARK MCLELLAN
MIEEM, MIEMA, CEnv**

ECOLOGY

In respect of:

Planning Application Reference: Y06/1647/SH (New Terminal
Building)

Planning Application Reference: Y06/1648/SH (Runway Extension)

relating to land at London Ashford Airport, Lydd, Romney Marsh, Kent, TN29 9QL

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Summary Proof of Evidence of Dr. Mark McLellan in respect of Ecology

1. Qualifications and Experience

- 1.1 I am Dr. Mark McLellan, a graduate biologist holding a PhD from the University of London in plant ecology. I am a Chartered Environmentalist (CEnv) and I have over twenty years' post-doctoral experience in environmental research and consultancy. I have especial experience in the environmental issues associated with airports and aviation, having been Head of Environment at London Luton Airport and having established GreenAscent, a consultancy practice specialising in sustainable aviation. I am currently Managing Director of MMX Environmental Practice.

2. Scope of Evidence

My proof of evidence covers ecological issues. Nitrogen deposition and ornithology are addressed in the proofs of evidence of Dr. Bethan Tuckett-Jones (LAA/8/A), Mr Nigel Deacon (LAA/6/A) and Dr. Roy Armstrong (LAA/7/A), respectively. The key conservation designations in respect of my Proof of Evidence are the Dungeness, Romney Marsh and Rye Bay SSSI and the Dungeness SAC. Both designations extend into the airfield as shown in Appendix 2 of my evidence. The ecological issues which remain at issue (i.e. which have not been agreed under a Statement of Common Ground with Shepway District Council (the "Council") or Rule 6 parties) are set out below.

- 2.1 Effects on great crested newts, in relation to the SSSI and SAC designations.** Great crested newts (GCNs) are cited as designated species both for the SSSI and the SAC. The effects of the proposals as a result of the Applications on GCNs have been comprehensively assessed by the Applicant, in a series of surveys undertaken at the airfield. Whilst the airfield is acknowledged as an important site for the meta-population of GCNs at Dungeness, the Applications would not have a likely significant effect on the SAC (but in any event the development proposals would not give rise to an adverse effect on the integrity of the SAC). Neither would the development proposals have a significant adverse effect on the SSSI. The main reason for the designations being unaffected in respect of GCNs is that the breeding ponds and associated habitat would be unaffected by the development proposals. Indeed, site enhancement measures have been proposed for this protected species

such that there would be an overall benefit to GCNs, due to habitat creation and enhancement of existing habitat.

2.2 The effects of the removal of drainage ditches in the SSSI and partly in the SAC. In order to accommodate the proposed runway extension, an 801m ditch length in the SSSI would need to be in-filled, 250m of which lies within the SAC. It has been acknowledged that the 801m length affected does contain ecological value, although it does not provide habitat for GCN. The ecological value is mainly in respect of fish, and aquatic and terrestrial invertebrates. Of these groups, only the aquatic invertebrate the medicinal leech is listed as part of the SAC designation. The SSSI designation includes a number of invertebrates (also including medicinal leech) as well as terrestrial invertebrates associated with the vegetation of shingle ridges.

2.3 The results of the Applicant's surveys show that mitigation is required for the loss of ditches, in respect of invertebrates (including medicinal leech), water voles and reptiles. In mitigation, the Applicant proposes the creation of 1300m of new drainage ditches and additional bespoke wetland habitat creation and enhancement. Provided that the proposed mitigations are implemented, the proposed development would not have an adverse effect on the integrity of the SAC and would not have a significant adverse environmental effect on the SSSI in respect of aquatic and terrestrial invertebrates, water voles or reptiles.

2.4 In addition, new bespoke habitat for aquatic invertebrates as well as reptiles and water voles, would be created and managed, under enhancement proposals in the area of the disused runway (labelled the "Habitat Creation Area" on the plan contained in Appendix 2 to my Proof of Evidence), providing overall benefits to terrestrial, aquatic and semi-aquatic invertebrates.

2.5 The nature of the protected species surveys in respect of Hammond's Corner roundabout outline design proposals. An outline design for a new roundabout at Hammond's Corner has been the subject of a number of ecological surveys, including an extended Phase 1 Habitat Survey and surveys for water voles. The Applicant's surveys of this area have concluded that there are no ecological issues, including protected species issues, which would prevent the grant of outline permission.

2.6 The effects on terrestrial invertebrates in the SSSI for the runway extension and new terminal development. The Dungeness peninsula in which the Airport is located supports an important assemblage of common and rare terrestrial invertebrates. The Applicant has commissioned surveys for terrestrial invertebrates in 2005 and 2008, concentrating on those areas of the airfield which would be affected by development proposals pursuant to the Applications. The study areas include the footprint of the runway extension and the lighting design for the new terminal building. The development proposals would not have a significant adverse environmental effect on terrestrial invertebrates in respect of the SSSI. The ditch habitat and runway grassland affected by the runway proposals are not of especial value for this group, and the small loss in habitat value would be mitigated by the new ditch length and bespoke habitat creation on the airfield site. Impacts on night-flying moths from lighting proposals associated with the new terminal building are proposed to be mitigated by reducing light emitted in ultra-violet part of the spectrum, and by extinguishing lights at night.

2.7 The effects on aquatic invertebrates for the runway extension proposal. The aquatic invertebrate species which is specifically listed for the SAC and SSSI is the medicinal leech. The medicinal leech is present on the airfield, but in water bodies which would be unaffected by the development proposals. Surveys of the ditches affected (see 2.2 above) in 2007 and 2010 showed that they are important for a range of aquatic invertebrates, especially water beetles and semi-aquatic weevils. No medicinal leeches were noted in during these surveys, though they had been noted in two ditch lengths during an amphibian survey conducted in 2006. In the opinion of the Applicant's invertebrate specialist Andrew Godfrey, the ditches could contain medicinal leech, and to include this possibility, mitigation proposals for that species are proposed. Accordingly, the development proposals would not have a likely significant effect on the SAC (but in any event the development proposals would not give rise to an adverse effect on the integrity of the SAC) and would not have a significant adverse effect on the SSSI in respect of the medicinal leech. Enhancement measures are proposed such that there would be an overall benefit for aquatic and semi-aquatic invertebrates, including the creation of 1300m of new drainage ditches which would be seeded with sediment from the ditches to be replaced. Additionally, bespoke wetland habitat creation and enhancement proposals would include benefit for aquatic invertebrates including

medicinal leech, and that species would be included in a proposed Airfield Biodiversity Action Plan (ABAP) which would monitor and manage habitat for a range of target species.

3. Conclusions

- 3.1 In respect of the SAC and in terms of GCNs, the development proposals would not have a likely significant effect on the SAC but, in any event, the development proposals would not give rise to an adverse effect on the integrity of the SAC. In respect of the SSSI and in terms of GCNs, the development proposals would not have a significant adverse effect on the SSSI. With the implementation of enhancement proposals set out, the Airport site would be considerably improved for GCNs as a result of the Applications.
- 3.2 An 801m ditch length in the SSSI would need to be infilled as a result of the runway extension proposal, 250m of which lies within the SAC. The ditch contains ecological habitat value, especially for aquatic invertebrates. Proposals are set out to mitigate for the loss of this ditch length. Mitigation proposals comprise a 1300m length of new ditch which ensure hydrological function and ecological mitigation. Provided that the proposed mitigation measures are implemented, the proposed development would not have an adverse effect on the integrity of the SAC and would not have a significant adverse environmental effect on the SSSI in terms of aquatic and terrestrial invertebrates, water voles or reptiles.
- 3.3 An outline design for a new roundabout at Hammond's Corner has been the subject of a number of ecological surveys, including an extended Phase 1 Habitat Survey and surveys for water voles. The Applicant's surveys of this area have concluded that there are no ecological issues, including protected species issues, which would prevent the grant of planning permission for the roundabout.
- 3.4 The development proposals would not have a significant adverse environmental effect on the SSSI for terrestrial invertebrate groups, for the following reasons
 - (A) The ditch habitat and runway grassland affected by the runway proposals are not of especial value for this group, and

the small loss in habitat value will be mitigated by the provision of a new ditch length and bespoke habitat creation;

- (B) With the adoption of an Airfield Biodiversity Action Plan which includes measures for terrestrial invertebrate species, the proposals would result in an improvement on the airfield for this group; and
- (C) Lighting proposals are designed to reduce attraction to night-flying moths.

3.5 Most of the existing aquatic invertebrate habitat on the airfield (Pond A, fish ponds, small water bodies) would be unaffected by either development proposal. Improved management of these water bodies is proposed to allow recovery of medicinal leech populations and to benefit other aquatic invertebrates.

3.6 The implementation of the habitat and species enhancements proposed in my Proof of Evidence would ensure the incorporation of beneficial biodiversity in the design of development for both Applications, in compliance with the overall objectives of PPS9.