



14 Wilderness Gardens, Northiam,

East Sussex, TN31 6GB

Tel/Fax: 07825 711863

Email: [brian.banks@swiftecology.co.uk](mailto:brian.banks@swiftecology.co.uk)

[www.swiftecology.co.uk](http://www.swiftecology.co.uk)

27 March 2009

**Dear Louise,**

**Review of the London Ashford Airport Surface Water Drainage Strategy For The Proposed Runway Extension, March 2009.**

Please find below my comments on the latest submissions from London Ashford Airport regarding alterations to the drainage regime.

My interpretation of this document is that the proposed extension of the airport runway into an area of farmland fields bounded by ditches will result in a net reduction in the extent of ditches, and it is proposed to make good the loss by the creation of a new length of ditch, managed for great crested newt, medicinal leech, water vole and aquatic invertebrates.

- It remains my contention that the ditches that would be destroyed by the proposed runway are of low significance to the SSSI/SAC great crested newt population as these animals breed in ponds and ditches that are distant from the proposed runway extension, and have not been recorded breeding in this ditch network.
- I note in section 6.9, third bullet point, that it is stated that the ditches will be set "as close to 150 m from the runway centre line as recommended by CAA guidelines for a clear area". You will recall that in their previous submissions the airport stated that Pond A would not need to be filled in, suggesting that a 105 m graded safety strip was all that was required rather than a 150 m graded safety strip. You sought clarification on this. The above statement further confuses the issue suggesting that a 150 m safety strip is required, which would once again threaten the most important newt pond, and areas of undisturbed shingle vegetation along the edge of the 105 m graded strip.
- It is stated (section 6.20) that no chemicals are used to de-ice the runway, only mechanical means, and that there is no intention to change this system.

If the airport is given planning permission there should be a S. 106 agreement requiring this runway management so that water quality in the new ditches is as high as possible.

- The drainage strategy results in a reduction in the length of ditches within the SSSI and SAC. Note that these features are included in the SSSI as boundary features and are unlikely to be a key feature of SSSI significance.

## **Appendix H**

### **General comment**

- The ditches currently lie within an arable farming area, subject to input of agricultural fertilisers. Removing them from this regime and ensuring that the airport is not subject to chemical de-icing might result in an improvement in their water quality, particularly if land drains could be prevented from discharging fertiliser-rich water into the new water drains.

### **First page, Third paragraph.**

- "Pond A and other ponds on the airfield are proposed to receive management treatment which would improve their habitat for key species". No detail is provided explaining what this would be.

### **First page, Fifth paragraph**

- Minor point, but there is a misunderstanding of the SAC features. Aquatic invertebrates are not SAC features, they are SSSI features. The great crested newt is the only SAC species.

### **Pages 2 & 4 – table.**

### **Section 4.2.13 – 4.2.15**

- This refers to a new ditch that will be created in mitigation for lost ditch habitat at an unspecified point on the airport land. It is stated that this will be amenable to medicinal leech. It is stated, however, that this area will be subject to measures to discourage birds. Given that medicinal leech are thought to require warm blooded hosts, that fish and amphibians are likely to be insufficient to support breeding populations, and that large mammals are absent from this area, the major source of blood meals would come from nesting water fowl. As these will be discouraged is this ditch really likely to benefit medicinal leech as stated?

### **Section 4.2.45**

- Details of the location of the new wetland habitat to be created, a ditch, are still not presented, but the detailed design will be finalised under the

Biodiversity Action Plan. We therefore do not know what habitats will be destroyed, or if the new ditch will pass close to other great crested newt breeding sites.

#### **Section 4.2.19/20. Fish eradication**

- The issue with fish eradication from newt ponds is that at present the ponds are either shallow and ephemeral and unsuitable for fish, or in the case of Pond A, sufficiently distant from a ditch network to make fish colonisation unlikely. If a new ditch was created that passed close to these ponds making fish colonisation more likely we would be in a situation where we had to rely more on artificial measures to maintain the fish-free state of the ponds. These would include pumping the ponds dry, or adding chemicals such as rotenone to kill the fish. Neither of these options is particularly attractive in an area that is of interest for other species groups. It is therefore important that the likely location of this ditch is specified so we can determine if this risk is real (see section 4.2.45, above).

#### **Recommendations**

- 1. You should continue to seek clarification on the requirement for a 150 m wide graded safety strip along the edge of the runway, because of the implications of this on vegetated shingle and great crested newt, both SSSI and SAC features.**
- 2. There should be a S.106 agreement requiring that de-icing of the runway is undertaken using mechanical methods rather than by application of chemical de-icers, so that water quality in the surrounding ditches is maintained as high as possible**
- 3. The newly created drains should not be connected to any land-drains to minimise agricultural fertiliser input to them, and optimise conditions for ditch plants and animals.**
- 4. Proposals for management of the habitats, and biodiversity targets should be clarified and presented in the Biodiversity Action Plan (BAP) before the planning application is considered, so that it is clear what advantages will be gained from this document, and to test that the targets are achievable.**
- 5. The developers should be asked to reconcile how they can promote conservation of the medicinal leech, as stated in their BAP, when their bird scaring requirements around the airport are likely to remove the most significant warm-blooded prey species from the site, i.e. nesting waterfowl.**
- 6. If a new ditch is to be extended into the SSSI it should not pass close enough to risk flooding and joining up to existing newt ponds during periods of wet weather (minimum separation distance of 20 m recommended), because of the risk of introducing predatory fish from the main ditch network into the newt ponds.**

Yours sincerely,

A handwritten signature in black ink that reads "Brian Banks." The signature is written in a cursive style with a period at the end.

Brian Banks

Principal Ecologist