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13 January 2010

Dear Louise,

**Review of recent documents from London Ashford Airport:  
Appendix 3 Biodiversity Action Plan.  
Appendix 6 Bird control, non-avian aspects.  
Appendix 7 Hammonds Corner water vole survey  
Response to Shepway District Council's letter dated 15 October 2009**

You have asked me to look at these documents and to advise you as to whether or not the Biodiversity Action Plan is adequate, to comment on non-avian issues relating to the Bird Control Management Plan, and to check if there were short-comings in the Hammonds Corner surveys. You also sent me the Airport's Response to Shepway District Council's letter dated October 15<sup>th</sup>, 2009.

In summary:

- The Biodiversity Action Plan is an improvement on the earlier draft, particularly for the great crested newt, although detail is lacking on the various proposals at this stage, and is required to confirm this conclusion.
- The significance of the fen habitats on this site do not appear to be appreciated and the plan needs modifying to recognise this and suggest better habitat management.
- There is still a major weakness in many of the conservation measures proposed for invertebrates (with the exception of the medicinal leech). In places there is too much emphasis on planting out vegetation on the shingle to attract rare species, rather than managing the shingle habitats in a way that delivers these species in a sustainable way.
- The bird control studies are an improvement in that the netting of ditches will not exclude moorhen, an important prey species for the medicinal leech, and further new ponds are proposed for this species. However I do wonder if the proposal to use recordings of bird alarm calls to scare birds from using the site will have the effect of reducing the host density for the leech.

- The work on Hammond's Corner is good as far as the Ward Body ditch is concerned; however the survey of the North Ditch was inadequate, presumably due to access difficulties. There is no discussion about how these ditches interact with other water vole habitat in the area, and their use as links between sites.
- No mention is made as to why great crested newt and the widespread reptiles were not surveyed.
- One element that is not covered in any of these documents is the future status of Pond A. Although Pond A is outside the graded area up to 105m of the runway centre line it is partly within the boundary of the 150m runway strip. Whether Pond A is considered an obstacle within this area has never been clarified. Any move to fill in the pond would damage great crested newt breeding habitat. A legal agreement with the local authority would be a good way to confirm its current status.

### Recommendations

1. You should welcome the proposals to remove scrub from areas of shingle vegetation and bare shingle (providing this is undertaken carefully with cut material not stacked on areas of shingle vegetation).
2. You should recommend that areas of fen habitat, particularly in the area around ponds 3 and 4 on the attached map are also cleared of scrub, **AND** reed, and managed to restore short-fen vegetation (dominated by sedges), similar to that found on some of the Open Pits on the Dungeness RSPB reserve.
3. You should in principle welcome proposals to manage the ponds, although final details have not been provided.
4. You should welcome the proposal for new, un-netted ponds on the footprint of the old short runway. If appropriately designed this should result in new habitat for great crested newt and medicinal leech.
5. You should question the location of the three scrapes marked on the plan in Appendix C. At least two of these appear to be on areas of shingle that would be better left undisturbed. I would recommend the deepening of the existing scrape, marked on Map 1, to create better newt breeding habitat.
6. You should point out that proposals for management of the cleared and graded strip will not benefit bumblebees such as *Bombus humilis* as suggested. Although this bee nests in tall vegetation it requires extensive areas of legume-rich grassland, and these are not to be provided.
7. I would point out that the provision of "refugia" for reptiles and amphibians is not necessary in an area of semi-natural habitat. It will damage existing features on the shingle and should be avoided.
8. You should point out that the proposals to plant out food-plants for moths and butterflies are not well thought-out, and are not necessary.
9. Whilst welcoming the decision to use nets that allow moorhen into the fenced ditches, and to create new unfenced pools for medicinal leech, you might wish to query the

impact of bird alarm calls on waterfowl using the various wetlands by the airport, and the significance of this on the prey supply for medicinal leech.

10. I would query why great crested newt was not subject to a survey at Hammond's Corner (note there might have been a good reason for this).
11. You should seek independent clarification of the future status of Pond A

More detailed comments are included in the attached annexe.

Yours sincerely,

A handwritten signature in black ink that reads "Brian Banks." The signature is written in a cursive, flowing style.

Brian Banks

Principal Ecologist

## **Annexe: Observations on document.**

### **Appendix 3 Biodiversity Action Plan**

There are some useful new proposals for some of the designated features of the SSSI/SAC in this document; however, there are still areas that are vague and of questionable benefit, particularly with regard to invertebrates, and the document could be improved by reference to the fen habitats in some of the wetlands, which are not adequately covered as yet in the draft Biodiversity Action Plan.

#### **Section 3.1.**

- There is a misunderstanding in the first paragraph of this section regarding a management agreement on the site. Whilst Natural England may have their own comments on this, as I was the officer dealing with this case whilst I worked for English Nature (now Natural England) I would like to point out, contrary to what is suggested in the report, that there was not a management agreement with English Nature on this land. One was proposed in 2002, funds were made available, and a contractor was found by English Nature to clear scrub from around the wetlands. This was to be the first stage of a programme to reduce the cover of willow and reed from the pools. The airport, however, never signed the agreement and no payments were made. Some limited willow removal was undertaken by the airport, under consent from English Nature, but not as part of a formal agreement, and it did not go as far as I would have hoped when we discussed the management agreement.

#### **3.1 Actions undertaken to maintain favourable condition of the SSSI.**

- Reference is made to “Not controlling water levels in the ditches around LAA”; this should perhaps be clarified. Controlling water levels could be useful if it involved keeping high water levels in the ditches, which would impact on water levels in the SSSI. It could be that what the airport mean is that they are not lowering water levels, but this would benefit from clarification.

#### **3.2 BAP Habitats and Species**

- Whilst the Kent Local Biodiversity Action Plan is referred to, no mention is made of the UK BAP. The land in question has examples of the following national BAP habitats: Coastal Vegetated Shingle, Lowland Fen, Ponds and Reedbeds. Priority BAP species that are not mentioned, but which occur on the site, include viviparous lizard (and potentially slow-worm and grass snake also).

##### **4.1.2 BAP Habitats and Species**

- Numbers of newts counted in ponds are unpredictable and are known to fluctuate erratically. This may be why the Target figure chosen is very conservative. A useful addition to the target might be that newts should be breeding in all of the main ponds (on my map Pond A, Ponds 2, 3 and 4, the scrape, the blind-ending ditch and the pond

formerly dominated by willows, plus any scrapes or ponds that might be created for the species).

#### **5 Summary – Scrub removal programme**

- This proposal is to be welcomed and as a priority should be particularly targeted around ponds 2, 3 and 4 on Map 1. As well as restoring unshaded vegetated shingle and bare shingle, attention should be paid to restoring areas of short fen vegetation with abundant sedges around ponds 3 and 4. The latter habitat is similar to some areas of fen community growing in the natural pits on the RSPB reserve (the Open Pits).
- The fen habitats growing on shingle are regarded as being features of the Special Area of Conservation, and are currently not in favourable condition due to invasive reed and willow. The transition from dry shingle communities to wet shingle communities is also another valuable feature of this part of the SSSI.
- I would add, however, that what is also required here is the control of reed in this wetland as it is also swamping the short fen vegetation with its characteristic low growing fen species such as sedges, marsh cinquefoil, etc.
- No maps are provided showing the area to be targeted for scrub clearance.
- There are also proposals to clear scrub and reed from the fish ponds to the north, and remove their fish. Whilst I would agree with scrub and reed control, I am not sure how successful fish removal will be. If shingle is being excavated from areas to create new scrapes perhaps some of this material could be placed in these ponds to make them more likely to dry out, but they would have to be careful to avoid damaging the shingle vegetation and ridges in these areas. Otter have been reported by the airport surveys. I am not convinced of this record, but if true I would question the wisdom of fish removal, especially since there are other opportunities for promoting newt conservation.

#### **5 Summary – Waterbody management**

- I strongly support the proposals to manage the ponds at the airport to make sure they remain in favourable condition for great crested newt, medicinal leech, aquatic invertebrates and fen vegetation.

#### **5 Summary – New ponds, scrapes and ditches**

- The proposed new ponds, which look as if they are to be located in the old south-eastern short runway (now removed), are a very welcome addition. They should be designed to desiccate occasionally in dry years (to prevent fish colonisation) and should be larger than indicated in the plan in Appendix C. They should be left to colonise naturally with vegetation, to avoid introducing problem species such as *Crassula* and reed. There will be a need to manage them in the long term to keep them suitable for newts and medicinal leech.
- A further three scrapes are proposed in the plan in Appendix C. It is not clear exactly where these are to be located without seeing the symbols over an aerial photograph. Two of them appear to be on shingle habitats, and the third may be in the vicinity of a damp willow-dominated area that has an existing rather poor great crested newt pond.

This latter area has patches of good shingle vegetation scattered around it, with scarce plants such as Nottingham catchfly, and I would suggest that all that is needed here initially is careful scrub removal. I would not create the other two scrapes either, but would deepen an existing partially excavated area (marked Scrape on my Map 1), if excavators can access the area without damaging the surrounding shingle vegetation. This wetland is very shallow and is a poor newt breeding site. It also has poor shingle vegetation as the area is close to the water table and has been excavated

**5 Summary – manage cleared and graded airfield grassland to maximise breeding skylark etc.**

- This refers to measures to conserve skylark and brown hare, which are welcome, and also refers to carder bumblebees as benefitting from the long vegetation. Appendix 6 refers to maintaining grassland continuously between 150mm and 250mm high all year round, and section 6.1.6 of the same report states that clovers and vetches are undesirable as they attract birds that are prone to bird-strike. This management is unlikely to be suitable for these bees, as these insects require a high density of flowering legumes such as red clover and meadow vetchling to successfully rear their young.

**5 Summary – Installation of artificial refugia for great crested newt and reptiles.**

- This measure is useful in areas where good terrestrial habitat is being destroyed and artificial measures are required. In this instance the location of these features in semi-natural habitat would destroy areas of shingle vegetation. This is not desirable. Newts survive elsewhere on the shingle without refugia, and this proposal should be dropped from the plan. The airport should concentrate on providing good quality wetlands for breeding as a priority.

**5 Summary – Planting of food plants to benefit moth and butterfly species.**

- The species of moth referred to feed on viper's- bugloss, a plant that grows on disturbed shingle (resulting from human activity, or rabbit scrapes, etc.). The plant is short-lived, and will require annual planting. There is no need to create this habitat as it will arise spontaneously as a result of disturbance on the site. The moths referred to, although rare nationally, are not rare at Dungeness because of the abundance of the food plant and do not require this sort of conservation exercise. Instead the Airport should prioritise protection of the existing range of shingle vegetation. If this is done the invertebrates dependent on this habitat should be able to look after themselves without unnecessary planting of food-plants.

**5 Summary – Allowing plant litter to accumulate to benefit species.**

- This could provide good terrestrial habitat for great crested newt, and structure for reptiles such as common lizard. The benefits depend on where this is allowed to happen however. If plant litter is allowed to build up in the area of damp fen around pools 3 and 4 it will eliminate valuable fen habitat. This is proposed as being of benefit to the carder bee *Bombus humilis*, but will not be effective unless there are also extensive areas of legume-rich grassland, and there is nothing in the plan detailing how or where

this can be achieved. Similarly it is suggested that *Aphrodes duffieldii* would benefit. This species requires very different habitat, occurring on sparsely-vegetated grassy shingle ridges, not the sort of vegetation that would benefit the newts.

- In conclusion therefore, there could be benefits from this approach for some species if undertaken in the right place, but again, proposals for invertebrates are of dubious benefit.
- A plan is required showing where this management is proposed as, dependent on the location, the results could have positive or negative impacts.

#### **Appendix C. Vegetated shingle condition, and 4.1.3 Coastal vegetated Shingle of the letter to Shepway District Council**

- I have some reservations about the method used to grade the quality of the shingle vegetation. The project is not complete, however, and the surveyors have not defined their criteria for grading the shingle (in four categories from Degraded to Good), making it difficult to comment definitively on this work

#### **Response to Shepway District Council's letter, section 4.18**

- The main report and executive summary state that there are proposals for identification and positive stewardship of vegetated shingle, especially lichen heath. The emphasis on lichen heath is not justified. Lichen heath is a valuable shingle habitat, but the interest of Dungeness is that it is a large and very diverse shingle site with a broader range of shingle habitats than are found on other UK structures. Other shingle communities are therefore just as valuable, as are the transitions from high dry shingle communities to wetland communities, and from vegetation on pure shingle to that growing on a sand-shingle mix. Such transitions are well represented on the airport land.

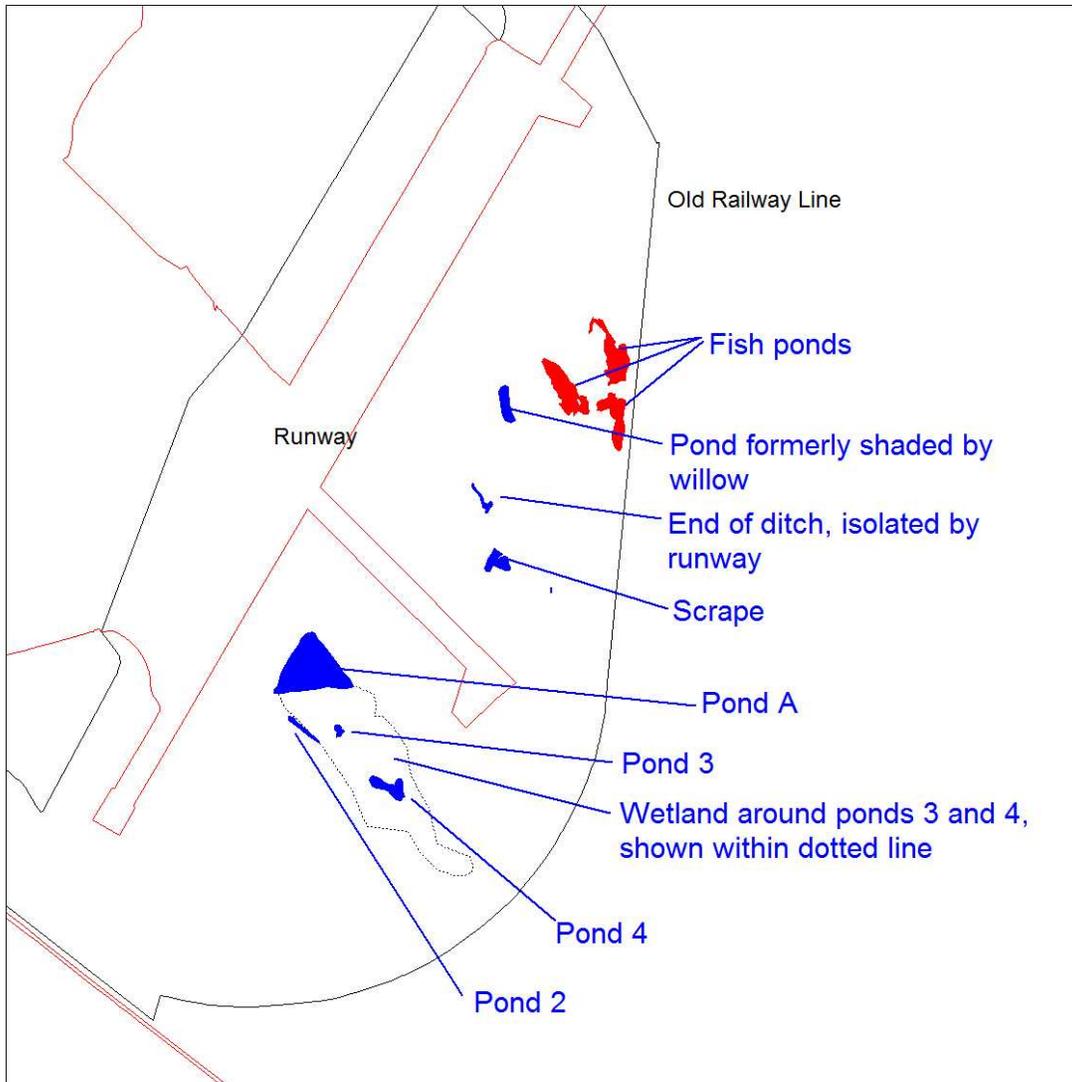
#### **Appendix 6 Bird control, non-avian aspects.**

- You asked me to comment on the non avian aspects of this document. My key concern relates to the medicinal leech, an SSSI notification feature. This species preys on a range of vertebrate species including fish and amphibians, but warm blooded species such as mammals and birds are thought to be particularly important for breeding leeches. On Romney Marsh warm blooded species comprise farm animals such as sheep and cattle (not present on this area) and waterfowl. The leech has been observed feeding on mute swan, and is also frequently found in the nests of waterfowl such as moorhen and mute swan where it is able to feed on nesting birds and their young. The species is found in the gravel pits adjacent to the runway, particularly Pond A, but may also have the potential to occur in the ditches around the proposed runway extension.
- An earlier draft of the Biodiversity Action Plan referred to proposals to create leech habitat by creating new ditches around the runway. However, these were to be covered in nets, preventing access by birds, the key warm-blooded prey species at the Airport.
- The proposals to create additional un-netted ponds for medicinal leech should be welcomed. In addition it is good that moorhen will be able to get through the nets to nest in the netted ditches.

- One remaining concern for this species, however, is the intention to broadcast distress calls of birds to dissuade them from using the environment around the airport. If this results in a long-term reduction in the numbers of waterfowl using the ponds it could reduce the food supply for the leeches.

#### **Appendix 7 Hammond's Corner water vole survey**

- The survey of the Ward Body ditch seems to have been done well. The corresponding survey of North Drain may well have had access problems because this ditch was surveyed from a distance of 30 m using binoculars. The data for this ditch is not reliable, therefore.
- Other elements that might have been mentioned in the report are as follows:
  1. The water vole's status as one of GB's fastest declining mammals, with some reference to recent national surveys that flag up the SE of England as an important refuge.
  2. The description of the site's ecological context is a bit thin. Are there water vole populations in the surrounding countryside and how well connected is the site to them?
  3. Even in their suboptimal state, the watercourses could still be of strategic importance for dispersal of individuals (especially when wet, but also when partially dry) and, thereby, may have a role in the maintenance of meta-populations.
- Great crested newt breed in ditches that dry out on Romney Marsh, for instance on arable land on the Little Cheyne Court wind farm. It would be worthwhile asking if this species was considered and why a survey was not undertaken.



- Key
- Newt ponds
  - Fish ponds
  - SSSI boundary
  - - - Boundary of valuable fen vegetation

Map 1 Ponds at London Ashford Airport

