

Transport Infrastructure Planning Unit
Great Minister House
33 Horseferry Road
London
SW1P 4DR

23rd April 2025

Sent by email to:

gatwickairport@planninginspectorate.gov.uk

Dear Sirs,

GATWICK AIRPORT NORTHERN RUNWAY PROJECT DCO

Response to SoS letter dated 27th February 2025 on the new duty introduced through the Levelling Up and Regeneration Act 2023

I write in response to the letter from the SoS for Transport, dated 27th February 2025 and specifically with reference to paragraph 15, that *“encourages Interested parties to reach agreement on what might be needed to meet this duty and provide any agreed provisions to be included in the Order accordingly.”*

The Surrey Hills National Landscape team has engaged collaboratively with the South Downs National Park Authority, Kent Downs National Landscape and the Applicant to respond to this request. This has included a joint meeting with the Applicant and the two listed Protected Landscapes identified above, as well as email exchanges. We are aware that the High Weald National Landscape has also written to you separately, setting out their position on the matter and they have been copied into our various correspondence with the Applicant.

Given the stage in the process that the DCO application is now at, this presents limited opportunities to incorporate measures into the scheme that would further the enhancement of the Protected Landscapes and help demonstrate compliance with the LURA Duty. Therefore, if it is determined that

[REDACTED]

notwithstanding the acknowledged harm to the four Protected Landscapes (as set out at ER 12.4.48) and consent is to be granted, a financial contribution made to the four impacted Protected Landscapes would be the most appropriate measure.

It has been agreed with the Applicant the South Downs National Park Authority, the Kent Downs National Landscape and ourselves that an appropriate mechanism to secure such a financial contribution would be through the insertion of an additional requirement within the DCO. It has also been agreed that it would be acceptable for this to be made as a single payment to the South Downs National Park Authority for onward distribution, by agreement between these three Protected Landscapes, plus the High Weald National Landscape should they wish.

In accordance with Defra's Guidance on the Protected Landscape Duty¹, the contribution would be used by the Protected Landscapes to deliver the aims and objectives of their respective Management Plans, with an intended particular focus on measures that respond to the specific harms arising from the development i.e. tranquility and dark night skies. Each of the impacted Protected Landscapes Management Plans make specific reference to and seek to promote tranquillity and dark night skies. Further advice on the importance of tranquility as set out in the draft Surrey Hills National Landscape Management Plan is provided in Annex A to this response.

Enhancement measures that the Surrey Hills National Landscape would seek to implement from a financial contribution include the funding of a tranquillity and Dark Skies Assessment and associated programme of advice, guidance and public engagement and associated implementation, building on our Inspiring Views programme.

Unfortunately, it has not been possible to reach an agreement with the Applicant on an appropriate financial amount. We are aware that a compensatory figure of £250,000 has recently been considered appropriate by the SoS in respect of impacts to the Chilterns National Landscape arising from the proposed Luton Airport expansion. Given that the proposal at Gatwick will result in impacts over a much wider geographical area, impacting four Protected Landscapes, and the much higher volumes of air traffic associated

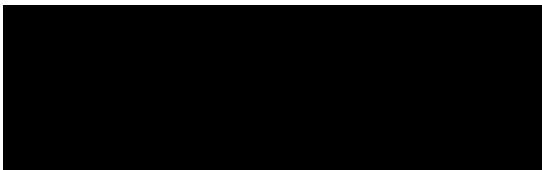
¹ Guidance for relevant authorities on seeking to further the purposes of Protected Landscapes, Defra, 16 December 2024 [link](#)

with Gatwick compared to Luton, it is considered appropriate to scale this up, while factoring in that the harm may not be as significant as identified from Luton for some of the Protected Landscapes.

It is therefore our position that a joint fund amount comprising a minimum of £750,000 is necessary. This is considered consistent with the Defra Guidance for relevant authorities on seeking to further the purposes of Protected Landscapes that specifies relevant authorities should consider whether measures are *“appropriate and proportionate to the type and scale of the function and its implications for the area”*.

In line with the Kent Downs National Landscape and South Downs National Park Authority, the above position is set out without prejudice and on the basis that the DCO will include all the noise mitigation requirements recommended to be incorporated in the Examining Authority’s report to the Secretary of State. Should such requirements be omitted, we would wish to review our position as set out above. We would also encourage the SoS to also consider whether any additional measures could be incorporated, such as operational controls and conditions to ensure that impacts to the Protected Landscapes are minimised as far as is possible.

Yours sincerely



Director, Surrey Hills National Landscape



Annex 1.

Surrey Hills Management Plan (Consultation Draft May 2025) Extracts

Part 2. Surrey Hills National Landscape Special Qualities

2.5.12 Tranquillity and Dark Skies. The Surrey Hills is greatly valued for its scenic beauty and provides wonderful inspiration. It is a resource for historical, cultural, ecological, archaeological and literary interest. The area has influenced some of the country's finest writers, poets, artists and musicians. That inspiration continues today with millions of visitors attracted to its beauty spots and viewpoints to seek recreation and inspiration. The area's abundance of natural features, local landmarks, attractive villages and breathtaking views means the Surrey Hills is valued as an area that is pleasant in which to live, work and visit. Many areas of the Surrey Hills however still retain a feeling of remoteness, isolation and tranquillity, including dark skies at night. Being within a densely populated county and region, the peace and tranquillity of the Surrey Hills is constantly being eroded by air traffic and motor vehicles passing through the area leading to congestion, light pollution and damage to country lanes. Increased light pollution comes from new development of many kinds, and has been exacerbated in recent years by evolving and highly affordable LED lighting technology. Against this backdrop of major economic and social forces, the inspirational qualities of the Surrey Hills landscape are often increasingly difficult to appreciate

Part 4. Policy Framework

Context:

Darker skies give the Surrey Hills a sense of remoteness and peacefulness. They need to be protected for the benefit of all and future generations, for our health, wellbeing, enjoyment and to increase our understanding and sense of place in the universe. Light pollution also detrimentally affects a wide range of nocturnal species. It comes as additional stress to habitat loss for already declining populations of many species across the Surrey Hills. Light emanating from buildings can intrude into views of an otherwise dark landscape.

Management Plan Policy

P11. Development proposals will need to demonstrate through accordance with the guidance note published by the Institution of Lighting Professionals on the Reduction of Obtrusive Light, how light pollution affecting the darker skies, wildlife and habitats of the National Landscape will be avoided, including obtrusive external lighting and internal light spill from extensive glazing within proposed domestic, commercial and other premises.



The Surrey Hills was one of the first landscapes to be designated an Area of Outstanding Natural Beauty (now referred to as National Landscapes) in 1958. It is now one of the 34 National Landscapes in England having equal landscape status to a National Park. The Surrey Hills National Landscape stretches across rural Surrey, covering about a quarter of the county.

The Surrey Hills Board was established in 2008 as a Joint Management Committee to develop policies and programmes that:

- Protect and enhance the natural and cultural heritage of the Surrey Hills
- Enhance public understanding and enjoyment of the area
- Promote the social and economic wellbeing of the Surrey Hills, particularly in regard to achieving the above objectives

The Core Members funding the Surrey Hills Board are:

- Guildford Borough Council
- Mole Valley District Council
- National Trust
- Natural England
- Reigate and Banstead Borough Council
- Surrey County Council
- Tandridge District Council
- Waverly Borough Council

The Advisory Members (non funding) are:

- CPRE Surrey
- Country Land and Business Association
- National Farmers Union
- Surrey County Association of Parish and Town Councils
- Surrey Hills Society
- Surrey Wildlife Trust

