

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

Sent by email to:
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Kent Downs
National
Landscape

**Kent Downs
National Landscape**
The Granary
Penstock Hall Farm
Canterbury Road
East Brabourne
Ashford, Kent TN25 5LL

28 May 2025

Dear Sir/Madam,

GATWICK AIRPORT NORTHERN RUNWAY PROJECT DCO

Response to SoS letter dated 28th April 2025 inviting comments on the Applicant's Submission of Additional Information of 24 April 2025

In response to the above, I draw attention to the letter from the Kent Downs National Landscape team, dated 23 April 2025, which sets out our full position on this matter. For ease of reference, I attach a copy of the letter as Annex A to this response.

Essentially, the KDNL team accepts the principle of a joint fund being provided by the applicant to enable conservation and enhancement of the four affected Protected Landscapes, as a means to help demonstrate compliance with the new duty introduced through the Leveling Up and Regeneration Bill. However, it is not considered that the proposed fund of £320,000 offered by the Applicant, to be distributed between the four Protected Landscapes, would enable a sufficient scale of conservation and enhancement measures across the affected landscapes that would demonstrate an "*appropriate and proportionate response to the type and scale of the function and its implications for the area*", as recommended in the [Defra guidance](#) on implementation of the duty. It is our position that the fund should be a minimum of £750,000, for the reasons set out in our earlier letter.

I hope this is of assistance to you.

Yours sincerely

, Director - Kent Downs National Landscape Team

Anglesey
Arnside and Silverdale
Blackdown Hills
Cannock Chase
Chichester Harbour
Chilterns
Clwydian Range
Cornwall
Cotswolds
Gower
Cranbourne Chase and
West Wiltshire Downs
Dedham Vale
Dorset
East Devon
Forest of Bowland
Howardian Hills
High Weald
Isle of Wight
Isles of Scilly
Kent Downs
Lincolnshire Wolds
Llyn
Malvern Hills
Mendip Hills
Nidderdale
Norfolk Coast
North Devon
North Pennines
North Wessex Downs
Northumberland Coast
Quantock Hills
Shropshire Hills
Solway Coast
South Devon
Suffolk Coast and
Heaths
Surrey Hills
Tamar Valley
Wye Valley

On 22nd November 2023, all AONBs in England and Wales were renamed National Landscapes. The Kent Downs National Landscape is the new name for the Kent Downs AONB.

Beautiful, thriving landscapes that [everyone](#) feels part of.

ANNEX A

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

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23 April 2025

Dear Mr Leigh,

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 Kent Downs National Landscape team has engaged collaboratively with the South Downs National Park, Surrey Hills National Landscape and the Applicant to respond to this request. This has included a joint meeting with the Applicant, SDNP, SHNL and KDNL as well as email exchanges. I am aware that the High Weald National Landscape have 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 Duty. Therefore, if it is determined that 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 SDNP, the SHNL 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 SDNP Authority for onward distribution, by agreement between these three Protected Landscapes, plus the High Weald National Landscape should they wish.

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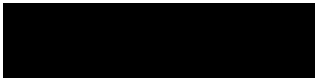
In accordance with Defra's Guidance on the Protected Landscape Duty¹, the contribution would be used by the Protected Landscapes to deliver the aims and objectives of their respective Management Plans, with an intended particular focus on measures that respond to the specific harms arising from the development 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 Kent Downs AONB Management Plan is provided in Annex A to this response.

Enhancement measures that the KDNL would implement from a financial contribution would seek to deliver the vision, aims and principles of the Management Plan and might include the funding of a tranquillity study. In the engagement and consultation stages of Management Plan preparation, tranquillity was consistently a highly valued asset of the National Landscape and restoring tranquillity in other parts of the National Landscape would be an appropriate compensatory enhancement. In order to take this work forward, a tranquillity survey of the National Landscape that would identify areas where tranquillity is threatened or particularly sensitive and that recommends investments to secure protection of established tranquil areas and mitigation of tranquillity impacts is required. A further enhancement measure could be the commissioning and publication of a dark night skies assessment and Lighting Guide for the KDNL.

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 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*".

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 - Kent Downs National Landscape Team

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

ANNEX A

TRANQUILITY, INCLUDING DARK NIGHT SKIES & THE KENT DOWNS AONB MANAGEMENT PLAN

In respect of the Kent Downs, tranquillity is recognised as one of its special qualities and components at Section 1.2 of the Management Plan¹ and is identified as a recurrent theme (Section 3.3) in the Management Plan. Here, it is identified that "*The erosion of tranquillity is an issue that has been emphasised in the public engagement stage of this AONB Management Plan, it is an important issue for the public and local authority partners and a part of the special characteristics and qualities of the Kent Downs*".

At section 3.4 of the Management Plan, under main issues, opportunities and threats, the following are identified:

- c. Cumulative loss of landscape features, biodiversity, tranquillity and character and suburbanisation has been experienced in the AONB due to incremental poorly located, designed and badly screened development, visitor pressure and leisure uses, intensive agricultural and forestry and woodland management practices, pressure from traffic and significant levels of urban growth and development.*
- f. Despite a significant loss and continuing pressure, the Kent Downs still provides important relatively tranquil areas; the National Planning Policy Framework (NPPF) places a requirement on Local Planning Authorities to identify tranquil areas.*
- g. Dark night skies are a feature of some parts the Kent Downs and are a valued part of the experience of tranquil rural areas.*

At 3.5 of the Management Plan, one of the identified aims is that:

"A comparatively tranquil environment is protected, conserved and enhanced."

Finally, two principles within the Management Plan specifically deal with tranquillity:

SD6 Activities to increase understanding of the importance and the extent of tranquillity, remoteness and dark night skies within the Kent Downs will be pursued.

SD7 New projects, proposals and programmes shall conserve and enhance tranquillity and where possible dark night skies.

¹ The Kent Downs AONB Management Plan 2021 to 2026 [link](#)