

6 June 2025

Transport Infrastructure Planning Unit
Great Minster House
33 Horseferry Road
London
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Reference: Application by Gatwick Airport Limited Seeking Development Consent for the Proposed Gatwick Airport Northern Runway Project (Ref: TR020005).

Further to the submission of additional information from Gatwick Airport Limited (GAL) in response to the letter from the Secretary of State for Transport (SoSfT), dated 27th February 2025, and the request for comments from Interested Parties the following response is provided by Cowden Parish Council (CPC).

Cowden is a village and civil parish in the Sevenoaks District of Kent. The parish is located on the northern slopes of the Weald close to the borders of both East Sussex and Surrey within the AONB. The parish is rural in nature and comprised approximately 350 residential properties. The parish is situated on the edge of Gatwick airspace and has been subject to an incremental increase in aircraft movements and aircraft noise over recent years. This has had a detrimental impact to the quality of life for the parishioners and those residents in the surrounding area.

Aircraft Noise Limits (Requirement 15)

GAL's response is provided on the basis that three erroneous assumptions were applied by ExA in their assessment. GAL have advised that the interpretation is not 'necessarily correct' and provided an alternative methodology. GAL's compliance with the ExA requirement should be mandated and not be negotiable against the alternative 'updated central case' in preference to the original 'DCO central case'.

Whilst CPC recognise the actions proposed by GAL in respect of aircraft noise, Cowden is on the periphery of 'Gatwick airspace' and outside of the 125Km² area relating to the 51dB air noise daytime contour. As such it is considered that the noise impact would not be improved by any proposals but would become more persistent with the resulting increased aircraft movements.

Aircraft altitudes and approach vectors vary significantly over Cowden with many aircraft joining the ILS beam 'late' and flying directly over the village. The limited respite through night flights compared to other UK airports operating practices is also a further factor that adversely impacts parishioners. As a result, many parishioners suffer from sleep disturbance and their 'well-being' is impacted as a result. There is also a further compounded concern associated with the potential future revision of flight paths (proposed UK's "skyways" project) that could result in a higher density of aircraft movements over many areas and the compounded noise impact that would result.

CPC consider that the interpretation and assessment undertaken by ExA is appropriate and should be applied as originally stated.

Receptor Based Noise Mitigation (Noise insulation Scheme) (Requirement 18)

CPC recognise the enhancements proposed to GAL's previous position. However, whilst the approach taken by GAL considers how this policy has been applied to other airports within the UK this is not considered entirely valid given some of the unique operational conditions that GAL are able to operate under, night flights for example. The proposed compensation scheme is considered to be 'one-sided' and unfair given it is a negotiated settlement process on a case-by-case basis between the householder and GAL, albeit supported through an 'expert-led disputes resolution process independent of GAL'.

The implications of this proposal are far reaching and potentially very onerous given the likely number of cases that will result.

Surface Access (Requirement 20)

The proposed solution offers up three reactive scenarios rather than a demonstrated solution. These are the result of not designing and validating a robust and sustainable solution to support the original proposal. As such there is a concern that if the surface access requirements are not achieved at day one the runway will be operational irrespective whilst negotiated conditions are agreed to the adverse effect of the surrounding areas and environment.

Other Matters

Greenhouse Gas Emissions

The compliance by GAL is predicated by the assertion that the test applied is at fault and is being applied to Gatwick Airport in its entirety rather than just to the impact of the addition of the northern runway. However, post construction the overall cumulative impact from greenhouse gas emissions, through increased aircraft movement, associated traffic movements and other contributing factor, will only increase which is counterproductive to achieving the requirements of the 'Sixth Carbon Budget'.

In summary CPC, like many of our neighbours, support sustained development and growth but not at 'any cost' and to the detriment of those affected, in particular our Parishioners. CPC consider that the recommendations made by ExA must be upheld in their entirety and not negotiated down to support GAL's commercial aspirations.

CPC consider that the ExA position is clear and any movements from this position must be transparent to all and if required supported through public consultation prior to any further progression of the northern runway project.

Sent via email

Andrew Saunders

Chairman Cowden Parish Council