



09 June 2025

Secretary of State for Transport
Department for Transport
33 Horseferry Road
London
SW1P 4DR

Dear Secretary of State

**Planning Act 2008 and the Infrastructure Planning (Examination Procedure) Rules 2010
Application by Gatwick Airport Limited seeking Development Consent for the proposed Gatwick
Airport Northern Runway Project**

We write in respect of the consultation on the additional information supplied by Gatwick Airport Limited (24 April 2025), following the Secretary of State's request for further information (27 February 2025).

This letter should not be taken as MAG making any comment on the merits of the proposed DCO. However, we are writing to raise grave concern in respect of the way in which Receptor Based Noise Mitigation (requirement 18) and the Surface Access (requirement 20) matters have been approached from a planning perspective.

Noise – Requirement 18

It is very concerning that the Examining Authority (ExA) has taken an inconsistent position when compared with several other relevant and recent airport decisions. Such contrary interpretation and application of current published noise and aviation policy is very worrying for aviation planning.

The ExA's report appears to include an incorrect application of noise 'effect levels' (e.g. LOAEL and SOEAL). We note that GAL has addressed this in detail in its response. Of particular note from MAG's perspective, is the incorrect interpretation of the conclusions of the Panel report into Stansted's last planning inquiry (see Annex 2, paragraph 3.18.1 of GAL's submission 25 April 2025).

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Manchester
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MAG fully supports the technical concerns expressed by GAL in section 3 of Annex 2 and requests that the Secretary of State re-considers careful and consistent application of noise policy to the DCO.

Surface Access – Requirement 20

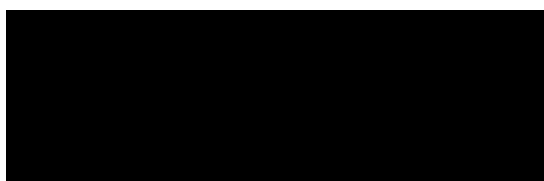
As set out, the proposed Requirement 20 is entirely unreasonable in planning terms, failing the tests for both planning conditions and obligations. Imposing such a control would create a dire precedent for infrastructure planning and for development investment in the UK, as a whole. Under no circumstances would any sensible development investment decision be taken when a planning control could have an effect to neutralise a development's use – either before its opening or after.

Surface access to UK airports is an important issue and there are many positive examples of how mode share can be influenced and negative impacts managed.

MAG urges the Secretary of State to reconsider this proposed control, mindful of the likely consequences it could have for long-term UK economic prosperity if such a precedent is created.

We trust these comments will be taken into account in the final decision.

Sincerely,

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Strategic Planning Director