

11 March 2024

Dear Mr Gleeson

**Written Representation for South Downs National Park Authority  
Gatwick Airport Northern Runway Project – Application by Gatwick Airport Limited for  
an Order Granting Development Consent  
PINS Ref: TR020005  
Unique Interested Party Reference: 20043581**

The South Downs National Park (SDNP) is located 23 kilometres from the application site, however flights departing and arriving at Gatwick Airport fly over the SDNP, often at a low height. Therefore, the proposals will have some impact on the SDNP with particular respect to tranquillity and dark night skies.

It does not appear that the application has had any regard to the SDNP's Statutory Purposes or the Special Qualities for which the National Park has been designated. The National Parks and Access to Countryside Act 1949, as amended by the Environment Act 1995, sets the following statutory purposes and duty for National Parks:

1. To conserve and enhance the natural beauty, wildlife and cultural heritage of the area; and
2. To promote opportunities for the understanding and enjoyment of the special qualities of the Park by the public.

The SDNPA also has a duty when carrying out these statutory purposes:

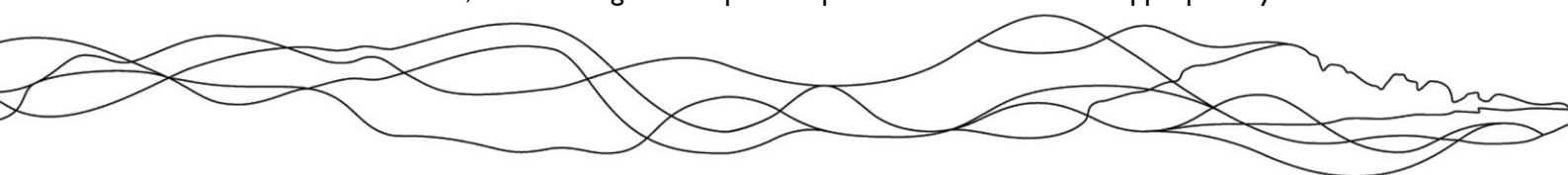
- To seek to foster the economic and social well-being of the local communities within the National Park.

In addition, under Section 11 of the National Parks and Access to the Countryside Act 1949, recently amended by Part 12, Section 245 (3) of the Levelling Up and Regeneration Act 2023, there is a duty placed on any relevant authority, such as the Planning Inspectorate, in carrying out their functions to 'seek to further' the purposes of the National Park. This ensures that relevant authorities take account of these purposes when coming to decisions or carrying out their activities relating to or affecting land within National Parks. It recognises that a wide range of bodies have a direct influence over the future of National Parks in terms of policy, project implementation, casework decisions, land ownership and management. It also acknowledges that the fulfilment of National Parks' statutory purposes rests not only with those bodies directly responsible for their management but that it also relies on effective collaborative working.

Where there is a conflict between the statutory purposes, statute (section 11A(2) of the 1949 Act) requires any relevant authority, when exercising or performing functions which relate to or affect land in a National Park, to attach greater weight to the purpose of 'conserving and enhancing'. Giving priority to the first purpose of the National Park is known as the *Sandford Principle*.

### **Tranquillity**

Tranquil and unspoilt places are a special quality of the SDNP – an important commodity in the densely developed South-East of England. The South Downs National Park Authority (SDNPA) considers the applicant has not adequately demonstrated that the relative tranquillity within the SDNP would not be harmed, or that mitigation to prevent potential harm would be appropriately



secured. There would be an impact on relative tranquillity as a result of overflights – to the SDNP as a whole and over key sites including Petworth Park and Ditchling Beacon. The Landscape and Visual Impact Chapter of the Environmental Statement advises that there would be a minor adverse effect on the perception of tranquillity, based on there being an increase of 2 flights per day over either the central and/or eastern part of the National Park. There is no mechanism to control or limit the number of flights per day and this figure seems extremely low in relation to the overall increase in flights that would be enabled by the proposed development.

### **Dark Night Skies**

The SDNP is designated as an International Dark Night Skies Reserve. More overflights above the SDNP will make it more difficult to view an authentic night sky. Increased contrails are also a potential concern – albeit a matter of debate. Contrails from overflights can disperse and create thin layers of clouds across the sky. The impact would be dependent on weather conditions, but an increase in flights (day or night) will increase the likelihood of contrails forming. When these clouds form, they reflect surface illuminations (as any cloud would do) and brighten the sky. These clouds tend to appear very translucent to the eye, but a Sky Quality Meter (SQM) detector would show a reduction in sky quality if pointed towards these clouds. This would in turn cause damage to the quality of the Dark Skies and potentially impacting on the integrity of the designation. Both Petworth Park and Ditchling Beacon are within the ‘Intrinsic Zone of Darkness’ where the Milky Way would be visible.

### **Conclusion**

The matters of the climate change and air quality implications of this proposed development will fall for others to judge, although with respect to the latter we have previously raised concerns regarding the deposition of nitrogen during the operational phase. The SDNPA remains concerned that the direct impacts on this protected landscape (which as a National Park, has the highest level of protection) in respect of tranquillity and the integrity of dark night skies have not been properly addressed and are likely to be harmful to the SDNP.

We would be happy to discuss further with the applicant, who to date has not engaged in any discussion with the SDNPA, to consider appropriate mitigation or compensation measures to address these concerns.

Yours sincerely,

Vicki Colwell  
Principal Planning Officer

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