

SOUTH DOWNS NATIONAL PARK AUTHORITY

SDNPA Holding Statement in response to Airports Commission Consultation “Gatwick Airport 2nd Runway: Business Case and Sustainability Assessment”

Although we have not submitted a formal and detailed response to this consultation, the South Downs National Park Authority wishes to register an interest in any future debate about a potential second runway at Gatwick Airport. The SDNPA has previously submitted a detailed response to the NATS consultation on London airspace use (see **Annex A**)

Should the Government choose to take the Gatwick second runway option forward (via the preparation of a National Policy Statement or Hybrid Bill, as well as any consultations which may be required to support any planning applications in response to the work of the Commission) there would be significant primary and secondary impacts on Britain’s newest National Park. This is because, extending as it does for 100 miles from Winchester to Eastbourne, the Park lies beneath flight paths (North-South and East-West) between Gatwick and the Channel, and because transport links to Gatwick, such as the London-Brighton mainline and the A23 and A27 trunk routes, cut through it.

We therefore welcome the statement that the Commission will *“not look at airport expansion in isolation but will consider how it interacts with the wider transport network, with broader policies in respect of economic growth, environmental protection and quality of life, and will consider how it affects different communities, businesses and localities”*. The South Downs National Park was designated in 2009 for its nationally important landscapes, biodiversity and cultural heritage, and is home to over 108,000 citizens, so is a very material consideration.

In relation to any future proposals which come forward for a Gatwick second runway or secondary upgrades to transport infrastructure, the South Downs National Park Authority will frame its response according to the statutory Purposes of National Parks as laid down by Parliament:

Purpose 1 is to conserve and enhance the natural beauty, wildlife and cultural heritage of the NP

Purpose 2 is to promote opportunities for the understanding and enjoyment of its special qualities

There is also a Duty on the Authority “to seek to foster the social and economic wellbeing of the local communities within the National Park in pursuit of the two Purposes”.

Under Section 62 of the 1995 Environment Act, all public bodies and utilities have a duty to take into consideration the purposes, and special qualities, for which the South Downs National Park was designated. Further to this, under Section 19, and Schedule 2 of the Civil Aviation Act 1982, the Civil Aviation Authority is also identified as a statutory undertaker.

The National Planning policy Framework

The current National Planning Policy Framework (NPPF) states that: *‘great weight should be given to conserving landscape and scenic beauty in National Parks, the Broads and AONBs which have the highest level of protection in relation to landscape and scenic beauty’* (Paragraph 115).

South Downs National Park Authority, South Downs Centre, Midhurst, GU29 9DH Tel: 0300 303 1053

Email: info@southdowns.gov.uk

The National Planning Policy Framework (NPPF) states that: '*Planning policies and decisions should aim to identify and protect areas of tranquillity which have remained relatively undisturbed by noise and are prized for their recreational and amenity value for this reason*' (Paragraph 123)

When the first Partnership Management Plan for the National Park was published in 2012, it took as its starting point seven Special Qualities. These are listed below, and a full description is in **Annex B**. They were derived from extensive evidence gathering and public consultation, and set out in more detail what the designation by Government of the National Park is designed to look after

In assessing the specific impacts of any detailed proposals upon this National Park, the SDNPA would expect the Department for Transport, Civil Aviation Authority and Gatwick Airport Ltd to be mindful of the framework of the seven Special Qualities. Under each Special Quality we have given examples of the types of impacts which a scheme particularly might have upon it, including the secondary induced transport impacts, and which the South Downs National Park Authority would expect to see objectively assessed:

1. *Diverse, inspirational landscapes and breath-taking views.* (impacts to be assessed should include: effects on landscape character, experience of the landscape and long, uninterrupted views)
2. *Tranquil and unspoilt places.* (impacts to be assessed should include: aircraft noise, lighting, effects on dark night skies);
3. *A rich variety of wildlife and habitats including rare and internationally important species* (impacts to be assessed should include; effects on internationally, nationally and locally designated and protected habitats and species, pollution, fragmentation and connectivity issues)
4. *An environment shaped by centuries of farming and embracing new enterprise.* (impacts to be assessed should include; effects on the farming economy and diversification and the ability of new enterprises to set up and develop sustainable businesses)
5. *Great opportunities for recreational activities and learning experiences.* (impacts to be assessed should include effects on the experience of local visitors, tourists and schools)
6. *Well-conserved historical features and a rich cultural heritage.* (impacts to be assessed should include; effects on historic and protected monuments, historic villages and communities)
7. *Distinctive towns and villages, and communities with real pride in their area.* (impacts to be assessed should include; aircraft noise, effects of any direct or indirect changes in traffic volumes and speeds, and access to local services)

The Authority expects that if a package of primary and secondary infrastructure proposals do eventually come forward in relation to Gatwick, that this package will:

- Demonstrate that there is no alternative which would have avoided or had a lesser impact on the seven Special Qualities for which the National Park is nationally designated
- Set out clearly, based on robust evidence, the nature and scale of these impacts
- Demonstrate how these impacts would be mitigated or compensated for, bearing in mind that a National Park landscape is protected and of national importance.

Clearly, a balance needs to be struck - nationally - between the benefits afforded by aviation to the economy and society and the need to safeguard the National Park landscapes and communities for the future. We expect this determination to be made by Government based on robust evidence on both sides of the equation.

Annex A

NATS LONDON AIRSPACE CONSULTATION SOUTH DOWNS NATIONAL PARK AUTHORITY RESPONSE

The South Downs National Park Authority (SDNPA) is grateful for the opportunity to make a response to this consultation. The consultation, and the proposals it contains, are of strategic importance to the SDNPA. Our principal interest is with Part 'D' of the consultation, which details proposed changes to routes for London Gatwick. These include the proposals that will have the most significant impact on the National Park.

The South Downs National Park was designated in 2009 in recognition of its outstanding Natural Beauty, Wildlife and Cultural Heritage. This status conveys the highest level of protection in relation to landscape and scenic beauty. The statutory purposes of the National Park are :-

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

Under Section 62 of the 1995 Environment Act, all public bodies and utilities have a duty to take into consideration the purposes, and special qualities, for which it was designated.

Further to this, under Section 19, and Schedule 2 of the Civil Aviation Act 1982, the Civil Aviation Authority is also identified as a statutory undertaker.

The National Planning policy Framework

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The current government policy on airspace also sets out a clear requirement to have proper regard to the purposes of National Parks and to take these into account when considering changes to airspace or air navigation routes.

We note that the consultation recognises that wherever practicable, air routes below 7,000 feet that may impact on protected landscapes such as National Parks and AONBs should be avoided.

However, in the case of the South Downs National Park, there are a number of potential impacts which we feel need to be considered, and factored into your judgements. In view of this we would like to make the following comments in response to the questions raised in the consultation.

Relevant National Park Policies in relation to this consultation

The proposals are of direct relevance to the following policies within the South Downs National Park's Partnership Management Plan (2014-2019):

Policy 1: Conserve and enhance the natural beauty and **special qualities** of the landscape and its setting, in ways that allow it to continue to evolve and become more resilient to the impacts of climate change and other pressures.

Policy 3: Protect and enhance **tranquillity** and dark night skies.

Tranquillity and the 'Special Qualities' of the South Downs National Park

The South Downs National Park is in South East England, one of the most busy and pressured regions of the United Kingdom. As a designated landscape it is highly valued for its sense of tranquillity being relatively unspoilt by noise and visual intrusion. This is an important aspect of how people experience the landscape and it is a special quality of the National Park. The South Downs is also greatly prized for their recreational and amenity value; with 46 million recreational day visits per year, it is one of the most popular landscape areas for quiet, informal recreation.

Tranquillity is a characteristic that makes a significant contribution to people's experience and enjoyment of the landscape. Being among the sights and sounds of nature has an important role to play in quality of life and people's health and well-being. The current Management Plan and Landscape Character Assessment for the National Park both identify tranquillity and dark night skies as important special qualities of the area, which we would seek to protect and enhance.

Noise and disturbance from aviation traffic overflying the National Park is a factor that detracts from this sense of tranquillity and is one of our principal concerns. We also note that the proposal includes an increase in air traffic which we feel will have a negative impact in terms of increased noise and disturbance.

Most of the arrival and departure routes that overfly the National Park are at an altitude of 7,000 feet or above. At this altitude we recognise that noise is considered less of an issue, and that other environmental objectives should factor into your judgement, such as the need for fuel efficiency and minimising CO² emissions.

The swathes identified as 'intermediate airspace', when both arrival and departure flights are between 4,000 and 7,000 feet will have the primary impact on the National Park. Arrival and departure routes, as well as holding patterns and merge points will all impact upon a significant stretch of the northern boundary of the National Park between Midhurst and Ditchling.

Within this intermediate airspace we feel that the priority should be, as far as possible, minimising the impact of aviation noise. We recognise that there is a balance to be struck, both in terms of trying to avoid effects on densely populated areas, and the need to achieve greater fuel efficiency and reductions in CO² emissions.

The proposals for air traffic hold pattern, shown in figure D5, also has the potential to impact significantly on the National Park. At times of heavy flight traffic, planes will be stacked at different altitudes before a landing slot becomes available. The holding pattern proposed would appear to operate at high altitude where the impact of aviation noise would be lessened. However, we consider that adverse impacts will still occur from the cumulative impact of multiple flights over the National Park.

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Email: info@southdowns.gov.uk

We recognise the generic benefits that are promoted for the 'Point Merge' proposals in terms of efficiency and wider environmental considerations such as reducing emissions. However, it appears that the proposals may not be limited to the airspace above 7,000 feet where they overfly the National Park. Again, we consider that this would have a major impact in terms of noise and disturbance, and detract from the special qualities of the area. It would also appear that this proposal would increase the extent and frequency of overflying of the National Park at times of heavy traffic.

Given the sensitivity of the National Park, and the value placed on tranquillity within it, we feel great weight should be given to it. We would consider that air routes below the 7,000 feet mark, where they overfly the National Park, should be avoided. This approach would be in line with current CAA guidance.

Where it is not possible to avoid adverse impact upon the National Park we would expect every effort should be made to mitigate or minimise those impacts. We consider there is a strong case to properly assess where significant adverse impacts are most likely to occur. A number of mitigation measures may then be possible, such as setting limits on noise levels, giving consideration to the frequency and timings of flights, and perhaps similar respite arrangements as those proposed for urban areas. We would welcome a further round of consultation once the selection of routes has been finalised. It will then be possible to make a properly informed judgement on the impacts upon the National Park and the most appropriate mitigation.

The principal aim should be to limit the impacts of noise levels and on the frequency of planes overflying the National Park as far as possible.

Biodiversity impacts

The noise and disturbance resulting from aircraft movements, both on approach and take-off, can also impact upon wildlife. This is especially the case for areas designated as priority habitat for protected species. General guidance from Natural England, the government's advisor on nature conservation, is that sensitivity to disturbance of designated sites is generally more pronounced at altitudes below 3280 feet. The proposals do not appear to involve the overflying of any designated wildlife sites (European sites, SSSIs or Nature Reserves) below this altitude. On this basis we do not consider the proposals will have a significant effect on any designated sites within the National Park.

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Annex B

All NPAs are required by Defra to set out and describe the Special Qualities (SQs) for which the particular NP landscape was designated and given national protected status. In the South Downs National Park these SQs were published in and formed the basis for the State of the National Park report 2012, informed the Partnership Management Plan 2014 and are informing the development of the Local Plan.



Rosemary's Parlour
North Street
Midhurst
West Sussex
GU29 9SB

South Downs National Park

Special Qualities

South Downs National Park

Special Qualities

Introduction

Within the diversity of the English countryside, the National Parks are recognised as landscapes of exceptional beauty, fashioned by nature and the communities which live in them. The National Parks and Access to the Countryside Act 1949 enabled the creation of the National Parks, and ensures that our most beautiful and unique landscapes have been, and will continue to be, protected in the future.

The purposes of National Parks are to conserve and enhance the natural beauty, wildlife and cultural heritage of the area and promote opportunities for the understanding and enjoyment of the special qualities of the National Park by the public. Working in partnership with other Local Authorities and organisations, National Park Authorities also have a duty to seek to foster the economic and social-well being of communities within the Park in carrying out the purposes.

The South Downs National Park is Britain's newest National Park. Situated in the heavily populated south east it has strong social, historical and environmental links with the major towns and cities in its hinterland.

The South Downs National Park is a living, working and ever-changing landscape, shaped by its underlying geology and its human history. It has many special qualities which together define its sense of place and attract people to live and work in the area and visit the National Park. These special qualities need to be understood, appreciated, conserved and enhanced.

The special qualities reflect both the engagement with stakeholders of the National Park and technical evidence.

I. Diverse, inspirational landscapes and breathtaking views

The geology of the South Downs underpins so much of what makes up the special qualities of the area: its diverse landscapes, land use, buildings and culture. The rock types of the National Park are predominately chalk and the alternating series of greensands and clays that form the Western Weald. Over time a diversity of landscapes has been created in a relatively small area which is a key feature of the National Park. These vary from the wooded and heathland ridges on the greensand in the Western Weald to wide open downland on the chalk that spans the length of the National Park, both intersected by river valleys. Within these diverse landscapes are hidden villages, thriving market towns, farms both large and small and historic estates, connected by a network of paths and lanes, many of which are ancient.

There are stunning, panoramic views to the sea and across the Weald as you travel the hundred mile length of the South Downs Way from Winchester to Eastbourne, culminating in the impressive chalk cliffs at Seven Sisters. From near and far, the South Downs is an area of inspirational beauty that can lift the soul.



Harting Down, West Sussex



Seven Sisters, East Sussex



The Hangers from Stoner Hill, Hampshire

2. A rich variety of wildlife and habitats including rare and internationally important species

The unique combination of geology and micro-climates of the South Downs has created a rich mosaic of habitats that supports many rare and internationally important wildlife species. Sheep-grazed downland is the iconic habitat of the chalk landscape. Here you can find rare plants such as the round-headed rampion, orchids ranging from the burnt orchid and early spider orchid to autumn lady's tresses, and butterflies including the Adonis blue and chalkhill blue.

The greensand of the Western Weald contains important lowland heathland habitats including the internationally designated Woolmer Forest, the only site in the British Isles where all our native reptile and amphibian species are found. There are large areas of ancient woodland, for example the yew woodlands of Kingley Vale and the magnificent 'hanging' woodlands of the Hampshire Hangers.

The extensive farmland habitats of the South Downs are important for many species of wildlife, including rare arable wildflowers and nationally declining farmland birds. Corn bunting, skylark, lapwing, yellowhammer and grey partridge are notable examples.

The river valleys intersecting the South Downs support wetland habitats and a wealth of birdlife, notably at Pulborough Brooks. Many fish, amphibians and invertebrates thrive in the clear chalk streams of the Meon and Itchen in Hampshire where elusive wild mammals such as otter and water vole may also be spotted. The extensive chalk sea cliffs and shoreline in the East host a wide range of coastal wildlife including breeding colonies of seabirds such as kittiwakes and fulmars.



Adonis blue butterfly



Round-headed rampion



Heathland habitat, Iping Common, West Sussex

3. Tranquil and unspoilt places

The South Downs National Park is in South East England, one of the most crowded parts of the United Kingdom. Although its most popular locations are heavily visited, many people greatly value the sense of tranquillity and unspoilt places which give them a feeling of peace and space. In some areas the landscape seems to possess a timeless quality, largely lacking intrusive development and retaining areas of dark night skies. This is a place where people seek to escape from the hustle and bustle in this busy part of England, to relax, unwind and re-charge their batteries.



Amberley Wildbrooks, West Sussex



Walkers on the South Downs Way, Devil's Dyke



Orchids on Beacon Hill, Hampshire

4. An environment shaped by centuries of farming and embracing new enterprise

The rural economy has strongly influenced the landscape and over 80 per cent of the South Downs is farmed. Past agricultural practices have produced some nationally valuable habitats including chalk downland and lowland heath, with traditional breeds specific to the area such as Southdown and Hampshire Down sheep significant in the past and still bred today. Many farmers and landowners are helping to conserve and enhance important habitats through environmental stewardship schemes. Large estates such as Goodwood, Cowdray, Petworth and Firle, with their designed parklands, have a significant effect on the landscape and the rural economy. The ownership of large areas of the eastern Downs by local authorities or the National Trust is a legacy of the early 20th century conservation movements to protect the iconic cliffs and Downs and the water supply to coastal towns.

Farming has always responded to the economy of the day and continues to do so. Some farmers are diversifying their businesses, for example by providing tourist accommodation and meeting the growing market for locally produced food and drink. Climate change and market forces continue to influence the landscape leading to new enterprises such as vineyards, and increasing opportunities for producing alternative energy, for example wood fuel.

However, the economy of the National Park is by no means restricted to farming. There are many popular tourist attractions and well-loved local pubs which give character to our towns and villages. The National Park is also home to a wide range of other businesses, for example new technology and science, which supports local employment.



Durleighmarsh Farm & Orchard, West Sussex



Harveys Brewery, Lewes, East Sussex



Sheep in the Meon Valley, Hampshire

5. Great opportunities for recreational activities and learning experiences

The South Downs offers a wide range of recreational and learning opportunities to the large and diverse populations living both within and on the doorstep of the National Park, and to visitors from further afield.

With 3,200 kilometres (2,000 miles) of public rights of way and the entire South Downs Way National Trail within the National Park there is exceptional scope for walking, cycling and horse riding. Many other outdoor activities take place such as paragliding, orienteering and canoeing. There is a chance for everyone to walk, play, picnic and enjoy the countryside, including at Queen Elizabeth Country Park in Hampshire and Seven Sisters Country Park in East Sussex.

The variety of landscapes, wildlife and culture provides rich opportunities for learning about the South Downs as a special place, for the many school and college students and lifelong learners. Museums, churches, historic houses, outdoor education centres and wildlife reserves are places that provide both enjoyment and learning. There is a strong volunteering tradition providing chances for outdoor conservation work, acquiring rural skills, leading guided walks and carrying out survey work relating to wildlife species and rights of way.



Cycling on the South Downs Way



Paragliding near Lewes

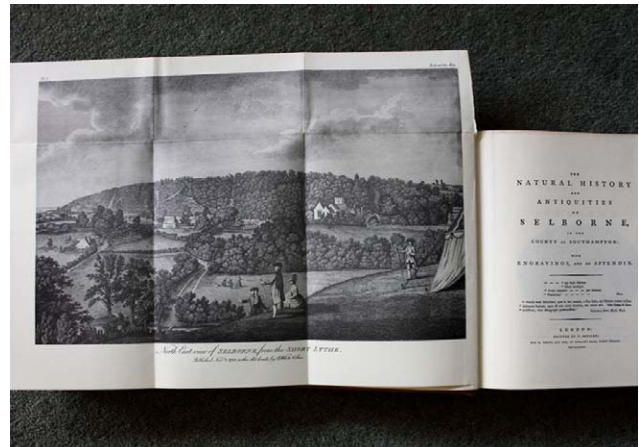


Butser Ancient Farm, Chalton, Hampshire

6. Well-conserved historical features and a rich cultural heritage

The distinct character of many areas of the South Downs has been created by well-conserved historical features, some of which are rare and of national importance. Bronze Age barrows, Iron Age hill forts, Saxon and Norman churches, dew ponds, historic houses and landmarks of the two World Wars help to give the National Park strong links to its past human settlement. These links are reinforced by the variety of architectural building styles spanning the ages. Evidence of earlier farming traditions can still be seen today in the pattern of field boundaries, and relics of the industrial past remain in the form of old iron workings, brickworks, quarries and ancient coppiced woodlands.

The South Downs has a rich cultural heritage of art, music and rural traditions. There is a strong association with well-known writers, poets, musicians and artists who have captured the essence of this most English of landscapes and drawn inspiration from the sense of place: Virginia Woolf, Jane Austen, Hilaire Belloc, Edward Thomas, Gilbert White, Edward Elgar, Joseph Turner, Eric Gill and Eric Ravilious, among many others. Today traditions continue through activities such as folk singing and events like Findon sheep fair. Culture lives on with new art and expression, celebrating the strong traditions of the past.



'The Natural History and Antiquities of Selborne' 1st Edition, by Gilbert White



Saxon Church, Singleton, West Sussex



The Chattri, above Brighton, East Sussex

7. Distinctive towns and villages, and communities with real pride in their area

The South Downs National Park is the most populated National Park in the United Kingdom, with around 110,000 people living within the boundary. Significantly more people live in the major urban areas and villages that surround the National Park including communities that are actively involved in the South Downs such as Brighton and Hove, and Eastbourne.

The South Downs is unique in having the largest market towns of any UK National Park - Lewes, Petersfield and Midhurst. The character and appearance of these and many other settlements throughout the National Park derives in large part from the distinctive local building materials. Picturesque villages like Selborne, Charlton and Alfriston blend into their landscapes.

Many of these settlements contain strong and vibrant communities with much invested in the future of where they live, and a sense of identity with their local area, its culture and history. Across the South Downs there are also communities of people who come together through common interests, for example, farming, conservation and recreation. These communities dedicate time and resources to enhancing community life, conserving what is important to them and planning for future generations.



The Lynchmere Society, West Sussex



Alfriston, East Sussex



Farmers' Market, Petersfield, Hampshire