

Consultation deadline – 3rd February 2015

Email response to airports.consultation@systra.com

Or upload to <http://www.smartsurvey.co.uk/s/134578HXH DU>

Airports Commission - Consultation Document

The High Weald AONB Unit is a small team funded by a partnership of 15 local authorities and Defra to provide advice on the conservation of the High Weald Area of Outstanding Natural Beauty (AONB), an exceptionally beautiful medieval landscape covering 1461 sq km across the counties of Sussex, Kent and Surrey, and protected by law as one of England's finest landscapes.

The scope of this advice is set by the statutory **AONB Management Plan**¹ which has been adopted by all partner authorities as 'their policy for the management of the area and for the carrying out of their functions in relation to it'². This advice also supports the duty on all public bodies and statutory undertakers set out in Section 85 of the Countryside and Rights of Way Act (CROW) 2000 to have regard to 'the purpose of conserving and enhancing the natural beauty of AONBs'.

This comment addresses three issues in the Airports Commission Consultation report that are relevant to the purpose of designation i.e. the conservation and enhancement of the natural beauty of the High Weald AONB, and achieving the objectives for AONB management set out in the AONB Management Plan:

1. The principle of airport expansion.
2. Relative tranquillity and the impact of noise on the quiet enjoyment of the High Weald AONB.
3. The impact of any further development at Gatwick airport or of supporting infrastructure on the High Weald AONB.

1. The principle of airport expansion

Any increase in air traffic of the magnitude suggested by the Airports Commission will have a detrimental impact on the High Weald AONB through increasing carbon emissions, jeopardising achievement of Objective G3 of the AONB Management Plan: *Climatic conditions and rates of change that support continued conservation and enhancement of the High Weald's landscape and habitats*. For example, the nationally and internationally important communities of lower plants surviving in the High Weald's shady and humid gill woodlands will be harmed by a warmer and drier

¹ <http://www.highweald.org/high-weald-aonb-management-plan.html>

² Countryside and Rights of way Act 2000

climate. The carbon trading mechanisms suggested to mitigate this are not considered robust or reliable. Under Section 85 of CROW 2000 we would expect the Department of Transport as a public body to require the Airport Commission to assess the likely impacts of these proposals on the conservation of our nationally important AONBs and as far as we can tell this assessment has not been carried out.

The Commissions supporting documents (<https://www.gov.uk/government/publications/airports-commission-interim-report>) do not appear to have properly considered alternative approaches to meeting demand for air travel such as shifting some of the high demand for short-haul flights to the rail network which is considerably less polluting than flying.

2. Relative tranquillity and the impact of noise on the quiet enjoyment of the High Weald AONB

Although the High Weald AONB sits in the busy South East region close to London its relative tranquillity³ is highly valued by residents and visitors, and concern over the intrusive noise of aircraft is increasing. Relative tranquillity is identified by the Statement of Significance as part of the AONBs natural beauty. Under Section 85 of CROW 2000 we would expect the Department of Transport as a public body to require the Airport Commission to assess the likely impacts of these proposals on the relative tranquillity of the High Weald AONB. As far as we can tell this assessment has not been carried out.

The High Weald has a population of around 127,000, making it the second most populous AONB of the 34 AONBs in England and nearly 1 million people live within 5km of the AONB boundary. The proximity of extensive publicly accessible natural greenspace (10,496 ha in the High Weald) and 2,570 km of public Rights of Way alongside iconic sites such as Hever Castle so close to where people live is part of what makes the High Weald particularly valuable.

3. The impact of any further development at Gatwick airport or of supporting infrastructure on the High Weald AONB

The High Weald AONB is one of the best surviving medieval landscapes in North West Europe. The pattern of dispersed small farmsteads surrounded by irregularly shaped fields intermingled with a network of ancient woodland, shaws and hedges has survived relatively unchanged for the last 700 years (the AONB Management Plan provides further information about the core components of natural beauty and their conservation). Recent archaeological excavations for the Bexhill link road suggest that a wealth of undiscovered remnants of human occupation dating back to the Mesolithic period may lie beneath this relatively undisturbed landscape.

While the proposed site of Gatwick's second runway does not lie within the High Weald AONB it is likely that additional infrastructure may have an impact either through physical developments or the effect of traffic generation. Any activity which causes physical damage to the fabric of the AONB landscape will have a detrimental impact on its 'natural beauty'. The extent of this damage will be specific to the type of activity and its location.

³ <http://www.cpre.org.uk/what-we-do/countryside/tranquil-places/update/item/1678-mapping-tranquillity-helps-to-protect-it>

Thank you for the opportunity to comment

Cllr. Brian Kentfield
Chairman of the High Weald Joint Advisory Committee

Location of the High Weald AONB –

