



LONDON GATWICK



Matter 9 – Sites Allocated for Development in the Plan

Issue 1 – Whether the strategic sites allocated in the Plan and associated policies are justified, effective, consistent with national policy and positively prepared?

Q9. Is Strategic Policy HA2: Land West of Ifield sound?

- a) What is the justification for the proposed number of dwellings and employment in total and over the plan period?**
- b) Does this allocation accord with the Plan’s vision and objectives?**
- c) What is the latest position with regard to the Development Consent Order for the Gatwick Northern Runway Project and are main modifications needed to this policy, other policies of the Plan or the Plan’s evidence base to reflect this?**
- d) Is the allocation consistent with paragraph 99 of the NPPF, particularly with regard to the loss of Ifield Golf Course?**
- e) Have the transport impacts of the proposed development been adequately assessed and is the mitigation proposed sufficient?**
- f) Have the air quality impacts been adequately assessed and is the mitigation proposed sufficient?**
- g) Have water and flooding impacts been adequately assessed and is the mitigation proposed sufficient?**
- h) Have heritage, biodiversity and landscape impacts been adequately assessed and is the mitigation proposed sufficient?**
- i) Do homeworking facilities form part of the 2.0ha of employment floorspace?**
- j) Have the impacts on Crawley been adequately assessed and mitigated?**
- k) Are the infrastructure requirements identified reflective of the latest evidence, justified and effective?**

1. GAL responded to parts (c), (e) and (h) of Question 9 in its representations to the Regulation 19 consultation. GAL notes the suggested modifications propose several alterations to Policy HA2 but none of these respond to its objections.

c) What is the latest position with regard to the Development Consent Order for the Gatwick Northern Runway Project and are main modifications needed to this policy, other policies of the Plan or the Plan’s evidence base to reflect this?

2. The Examination into the Gatwick Airport Northern Runway Project (NRP) Development Consent Order (DCO) closed on the 27 August 2024. The Project is now at ‘Recommendation’ stage with the Examining Authority due to submit its recommendation report to the Secretary of State (SoS) by the 27 November 2024. There follows a 3-month period for the SoS to consider the recommendation and issue a decision. The decision is therefore due to be issued by the end of February 2025, unless the timeframe is extended by the SoS. There follows thereafter a 6-week period during which judicial review of the decision can be sought.



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3. The Northern Runway Project is not an alternative or replacement for the development of a new runway to the south of the existing runway. That scheme remains a longer-term objective for GAL and would produce an additional step change in airport capacity. The current proposals are shown in the Gatwick Area Masterplan 2019 (GAMP). Guidance at Annex B of the 2013 Aviation Policy Framework says that airport masterplans are to *“be given due consideration in local planning processes”* (paragraph 4.11). The GAMP 2019 is a material consideration for both plan making and development control matters.
4. The GAMP 2019 shows that the area of Gatwick Airport Safeguarded Land falling within Horsham District being utilised for the additional runway, taxiway, and noise bund, together with associated works including the diversion of the River Mole. GAL consider these facilities are critical infrastructure contingent on the delivery of the southern runway.
5. The Crawley Local Plan 2023 to 2040 was adopted on the 16 October 2024. The Inspectors noted that whilst the plan was at Examination, the DCO process remained to be determined and so, accordingly, the submitted Crawley Local Plan is justified in setting out a policy framework on the basis of a single runway, two terminal airport. The Examination Report also noted that if circumstances changed, and the DCO is approved (in whatever form), that would be a matter for Plan review (*Paragraph 168 of the [Examination Report](#)*) if policy changes are required.
6. GAL consider the same considerations apply in the case of the Horsham Local Plan as the DCO has not yet been finally determined.
7. If the DCO is granted, the period of implementation that follows will occur over many years with dual runway operations projected to commence in 2030 with passenger numbers building up over the following decade. Consequently, the impacts of the operation of the NRP will not be felt for nearly a decade, allowing for the local plan to be updated in line with standard review timeframes.
8. GAL also consider that the DCO decision holds far fewer implications for Horsham District in comparison with Crawley Borough (wherein the majority of the airport is situated), as the NRP proposal does not directly affect any land in Horsham or the need to safeguard land for the Southern Runway. The potential for there to be an impact arising from the decision on the spatial strategy for Horsham District is considered to be low but if there are any implications arising this can be addressed through a review of the plan at a later time.
9. GAL do not consider it necessary or appropriate for the Horsham Local Plan to be paused or modified at this time pending the decision of the Gatwick NRP. Should that proposal be approved, there will be sufficient time following approval and subsequent implementation for the plan to be modified if this is necessary through the normal plan review requirements.

e) Have the transport impacts of the proposed development been adequately assessed and is the mitigation proposed sufficient?

10. Regarding the safeguarding of land, the fundamental and clear test for plan-makers is at NPPF (December 2023) paragraph 106c where it requires consideration of whether there is robust evidence to identify and protect sites that would be critical in developing infrastructure to widen transport choice and realise opportunities for large scale development.
11. The Inspectors appointed to conduct the examination of the Crawley Local Plan accepted that where land is required for the second-wide spaced runway, aircraft manoeuvring and passenger facilities, safety buffers and essential highway and watercourse diversions in the GAMP 2019, it would be 'critical' to the delivery of the scheme and so warranted being protected through 'safeguarding' (*paragraphs 79 and 80 of the [Examination Report](#)*). GAL consider the same conclusion can be applied to the area of safeguarded land falling within Horsham District for the same reason. GAL consider it would be perverse for the Crawley Plan to protect land critical to the delivery of the Southern Runway project but for the Horsham Plan to frustrate the project by not similarly protecting the critical land required for the project which lies in Horsham district.
12. The Proposals Map delineates an indicative safeguarded area for the long-term development of the Crawley Western multi-modal corridor (refer to paragraph 10.97 of the written justification in the Submission Version Local Plan). The requirement to protect the safeguarded area from development which may frustrate the provision of the route is set out in Policy HA2 under part 9.
13. The Schedule of Suggested Modifications (SD14) amends part 9 to remove reference to 'safeguarding' on the basis the term is considered too prescriptive when the allocation is meant to define an area of search (Suggested Modification reference HM069). The Inspectors examining the Crawley Local Plan considered a similar approach in that document and concluded it was a "*... reasonable and justified approach in advance of growth being established in other Local Plans*" (*paragraph 258 of the [Examination Report](#)*).
14. At Regulation 19 stage, GAL objected to the absence of a requirement in Policy HA2 to protect the land safeguarded for the expansion of Gatwick Airport. The suggested Modification to part 9 of Policy HA2 underlines the importance of including such a requirement. Whilst the allocation for the Crawley Western multi-modal corridor is simply an area of search, the area protected for the expansion of Gatwick Airport is 'safeguarded'. There is consequently a much higher degree of policy protection for the safeguarded area which should be reflected in the approach and text of Policy HA2. This has importance in relation to development associated with the development of the HA2 Strategic Allocation – it must remain compatible with the potential future southern expansion of the airport.



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15. The area of search also overlaps with the land safeguarded for the expansion of the airport. The Inspectors examining the Crawley Local Plan also looked at a similar overlap in that plan and concluded "...that the area of search is just that, further assessment work would be required dependent on plans for West of Crawley in Horsham District" (Examination Report paragraph 259).
16. However, the Inspectors found the Plan would not appropriately recognise the potential tensions between delivering a western link and the extent of safeguarding for a potential second wide-spaced runway and associated safety buffers and perimeters. They consequently concluded that it was necessary for an additional criterion to be added to Strategic Policy ST4 (which addresses the area of search for a Crawley Western Multi-Modal Transport Link) requiring account to be taken of the land safeguarded for the airport expansion in its design and routing. The Inspectors consequently recommended main modification reference MM37 as being necessary for effectiveness (refer to paragraph 262 of the Examination Report).
17. Adopted Policy ST4: Area of Search for a Crawley Western Multi-Modal Transport Link consequently now reads:

"The Local Plan Map identifies an Area of Search for a Crawley Western Multi-Modal Transport Link connecting the A264 with the A23.

The design and route of the Western Multi-Modal Transport Link must take account of:

...
c. land safeguarded at Gatwick Airport for potential future southern runway expansion."
18. GAL consider this is a sensible approach and that a similar criterion should be included in Policy HA2 to both protect the land safeguarded for airport expansion and ensure consistency with the approach of the equivalent policy in Crawley.
19. On a related point. It is noted that the degree of overlap between the Area of Search and the Land Safeguarded for Airport Expansion is at one point so significant that there is, in effect, no alternative but for the final route to utilise safeguarded land. The extract from the policies map in **Figure 1** overleaf shows the 'pinch point'.

Conclusions

20. GAL consider the extent of the area of search in this location is ineffective as the conflict with Safeguarded Land means it is that the Western Multi-Modal Transport Link could not be provided within the defined area of search due to its significant overlap with the safeguarded area. GAL consider the area of search is consequently unrealistic and should be revised to ensure that the area defined provides a realistic opportunity for providing the desired link.



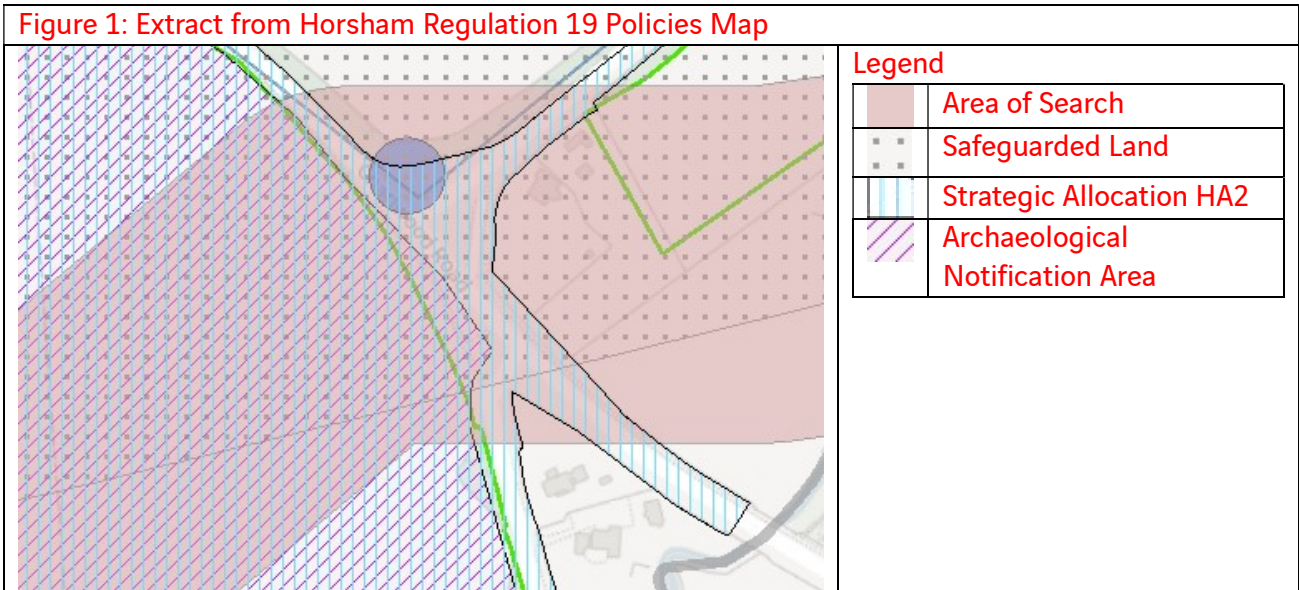
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21. GAL also consider that this tension between the two policies underlines the importance of including an additional criterion in Policy HA2 similar to that provided in Policy ST4 of the recently adopted Crawley plan to ensure that the conflict between the respective requirements of the two policies is appropriately managed and explicitly addressed in the policy itself. GAL suggest that a main modification is made to Criterion 9 of Policy HA2 to take account of the Gatwick safeguarded land that could read as follows:

9. No development shall occur within an ~~safeguarded~~ area of search as shown on the Policies Map that may prejudice a full Crawley Western multi-modal corridor from the A264 near Faygate to the A23 south of Gatwick, north of County Oak. **The subsequent design and route of the Western Multi-Modal Transport Link must take account of land safeguarded at Gatwick Airport for potential future southern runway expansion ."**

Figure 1: Extract from Horsham Regulation 19 Policies Map





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h) Have heritage, biodiversity and landscape impacts been adequately assessed and is the mitigation proposed sufficient?

22. It is noted that the Gatwick Airport Safeguarded Land overlaps with the northern point of site allocation HA2, Land West of Ifield. Figure 7: Land West of Ifield Masterplan in the submission draft plan shows the area of overlap as 'greenspace'.
23. GAL objected to the policy requirement to achieve a minimum 12% BNG target as the submitted suite of policy, appraisal and evidence documents does not provide the required justification. The Horsham BNG Assessment ([Document EN06](#)) undertook an assessment of the best reasonable achievable biodiversity net gain compared to minimum 10% target across a series of representative sites, including the strategic allocation Land West of Ifield (see Table 3 therein). This analysis concluded that the maximum onsite BNG which could be achieved is 7.29%, with the remainder having to be achieved through off-site contributions.
24. The proximity of Strategic Allocation HA2 to Gatwick Airport raises an additional level of consideration which is not common with most housing allocations. That is the need to consider the potential implications of BNG enhancements on the safe operation of Gatwick Airport in relation to aerodrome safeguarding, particularly through increased risk of bird strike, and, whether it is appropriate to locate BNG in the safeguarded land. The policy requirement to achieve in excess of the statutory 10% gain needs to be tempered through these additional considerations in terms the amount and type of BNG sought and its location, and whether they would be capable of fulfilling their role for the required time period. For example, when the BNG requirement would need to be fulfilled off-site it would need to be secured through a S106 agreement or conservation covenant and be in place for 30 years. If the area for BNG overlaps with the Gatwick Airport Safeguarded Land this could, over those timescales, have implications for the delivery of the southern runway to expand Gatwick Airport beyond this Local Plan period (2040 and beyond).
25. Aircraft are highly vulnerable to wildlife strike risk and birds are the most problematic species in the UK. The airport operator must be notified of developments that have the potential to increase the bird strike risk but GAL's concern in the context of the Local Plan is that the inflated BNG provision, that does not accord with Paragraph 185 of the NPPF or the National Planning Practice Guidance (Paragraph: 006 Reference ID: 74-006-20240214), could give rise to habitats in close proximity to the airport that become bird attractors (e.g. drainage ponds, swales and other water bodies) and therefore incompatible with the airport's safe and continued operation.
26. The BNG considerations are further complicated due to the overlap with the Gatwick Airport Safeguarded Land for the Southern Runway. Should the Southern Runway proposals come forward within 30 years of the implementation of a planning permission for the West of Ifield, any BNG provision within the safeguarded land would add additional cost and complexity to the delivery of growth at Gatwick. This might undermine the ability of that



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scheme to meet its requirements in the long term, particularly should this be controlled by way of legal agreement.

27. Similar considerations arise in respect of any structural landscaping proposed within the area of overlap which need to be compatible with aerodrome safeguarding considerations, and the Gatwick safeguarded land. If planted in the wrong location this potentially would need to be removed. In the long term this would not add to the achievement of either BNG or good quality structural landscaping for the new strategic development site. GAL therefore suggest that the following modification is made to Criterion 4 of Policy HA2. This aligns with GAL's representations and suggested modifications to Policy 26.

4. Proposals must provide a comprehensive Ecology and Green Infrastructure Strategy, incorporating a Biodiversity Net Gain Plan, to demonstrate how a minimum 12% net biodiversity gain will be achieved on the site, and in particular demonstrate:

- a) That the Ifield Brook Meadows Local Wildlife Site and Local Greenspace is conserved and enhanced, ensuring an appropriate buffer.
- b) That the Ancient Woodlands at Ifield Mill Stream, Hyde Hill, The Grove and Ifield Wood are protected and enhanced, ensuring an appropriate buffer.
- c) The delivery of a biodiverse River Mole Linear Park, which protects and enhances the riparian ecosystems along the River Mole corridor.
- d) That other ponds, watercourses, wetlands, ecologically important hedgerows and woodlands and veteran trees are in the first instance protected and enhanced in situ, or else impacts appropriately mitigated to ensure the protection of protected or vulnerable species.
- e) Ensure the retention and creation of wildlife corridors, and support delivery of the emerging Nature Recovery Network.
- f) The proposals do not have an adverse impact on operations at Gatwick **Airport Area** through, **for example**, increased risk of bird strike, creating building-induced turbulence or lighting that could pose a hazard to the safe operation of the airport **aerodrome**. **In addition, the airport operator will be consulted on the masterplan and planning application proposals within the aerodrome safeguarding area.**
- g) Necessary mitigation measures are included in the site design to mitigate impacts on protected species, including Bechstein's bats.

Conclusion

28. It remains critically important that the masterplan for Strategic Allocation HA2 protects the continued safe and efficient operation of the airport and prevents development (including both BNG and landscaping) which would conflict with the land Safeguarded for its expansion through the construction of a wide spaced southern runway.

Additional Comments Regarding the Evidence Base

1. It is noted that none of the following documents have been added to the Examination Library:
 - i). Gatwick Airport Surface Access Strategy 2022-2030
https://www.gatwickairport.com/on/demandware.static/-/Sites-Gatwick-Library/default/dw1d34163e/images/Corporate-PDFs/Sustainability/Surface-access-reports/Surface_access_strategy.pdf
 - ii). Gatwick Airport Masterplan 2019
https://www.gatwickairport.com/on/demandware.static/-/Sites-Gatwick-Library/default/dw5fa1fcde/images/Corporate-PDFs/Masterplan/Gatwick_Airport_Masterplan_2019.pdf
 - iii). Report on the Examination of the Crawley Borough Local Plan 2024-2040
<https://crawley.gov.uk/sites/default/files/2024-10/Crawley%20Borough%20Local%20Plan%20Inspectors%27%20final%20report%20September%202024.pdf>
 - iv). Gatwick Northern Runway Proposal Environmental Statement Appendix 17.9.3
<https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/TR020005/TR020005-000884-5.3%20ES%20Appendix%2017.9.3%20Assessment%20of%20Population%20and%20Housing%20Effects.pdf>
 - v). Gatwick Airport Aerodrome Safeguarding Constraints Map 2024 (enclosed)
2. As GAL has referred to these documents it is considered they should be included within the evidence base for the Examination into the Horsham Local Plan. Links are included above (except for the Aerodrome Safeguarding Map which is enclosed) and it is requested these documents be added to the library.
3. The Gatwick Airport Surface Access Strategy seeks to achieve increased use of sustainable transport modes and ultra-low or zero emissions vehicles to access Gatwick airport which is in part dependent on control over parking provision and supports the approach of Policy 25.
4. The Gatwick Airport Masterplan 2019 is a material consideration in plan-making and sets out the justification for the safeguarding of land for the Southern Runway project.
5. The Examination Report into the Crawley Local Plan was issued after the Horsham Regulation 19 consultation and is helpful in understanding the position of the adjoining borough in respect of policies which cross borough boundaries and is referred to by Horsham District Council in the justification for 'suggested changes'.
6. The Gatwick Northern Runway Proposal Environmental Statement Appendix 17.9.3 reviews the impact of NRP on housing need.



7. The Gatwick Airport Aerodrome Safeguarding Map 2024 was published after the close of the Regulation 19 consultation for the Horsham Local Plan on 1st March 2024.