

24 SEPTEMBER 2026

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Sent by email to programmeofficer@horsham.gov.uk

Dear Ms Trueman

Horsham District Local Plan 2023-2040 Examination in Public – Matter 6A: Strategic Policy HA2: Land West of Ifield

Introduction

This hearing statement is submitted on behalf of Gatwick Airport Limited (GAL) in relation to Matter 6a of the Horsham District Local Plan Examination in Public, concerning Strategic Policy HA2: Land West of Ifield. GAL does not wish to attend the forthcoming Hearing sessions in October 2026 but thought it would help the Inspector to have an update on their position since their previous submissions to the Local Plan review.

GAL submitted representations at the Regulation 19 stage on 1 March 2024. GAL reviewed Strategic Policy HA2, the extent of the allocation on the Policies Map and the masterplan at Figure 7 and raised objections to aspects of the policy, but not the principle of the allocation itself. This remains GAL's position especially in light of the Hybrid Planning Application that has been submitted by Homes England for development of the strategic site.

Since the Regulation 19 stage, GAL has engaged as a statutory consultee on the hybrid planning application submitted by Homes England for the Land West of Ifield site (planning reference DC/25/1312). GAL submitted representations on that application in November 2025 and June 2026. The matters raised in those representations speak directly to the soundness of Policy HA2 and reaffirm the reasons why GAL maintains that Policy HA2 needs to be revised.

The most important issue for GAL relates to safeguarding – both land safeguarding and aerodrome safeguarding and directly related to that, ensuring that Policy HA2 accounts for current and future planned operations at Gatwick Airport.

The Inspector has copies of the representations already submitted by GAL but for ease, these are summarised briefly below:

Regulation 19: Policy 26 – Gatwick Airport Safeguarding

GAL remains concerned at the way Policy 26: Gatwick Airport Safeguarding conflates two separate safeguarding issues:

1. the safeguarding of land to accommodate the airport's expansion; and
2. aerodrome safeguarding which protects the safe operation of the airport.

These require separate policies as they relate to two very separate matters and apply to different geographical areas.

Regulation 19: Policy HA2 – Land West of Ifield

GAL does not object to the principle of the strategic allocation. GAL's continued concerns relate to four specific aspects of the policy as submitted.

Criterion 2 – Masterplan and Noise

Figure 7 clearly showed the extent of built form being limited to that part of the allocation to the south of the 60dB Noise Contour. Criterion 2 of Policy HA2 requires the development to be in accordance with "a comprehensive masterplan" but does not cross-reference this to Figure 7. We note that the Main Modifications delete Figure 7 from the Local Plan but state that any further modifications made to these will be consequential to other changes and will be considered at a later date. There remains significant risk that housing development could take place in locations unsuitable due to aircraft noise and even more so in light of the Council's decision to delete Figure 7. This remains a significant concern for GAL which has been highlighted through the planning application that has been submitted (see below).

Criterion 4 – Biodiversity Net Gain

This level of BNG is not considered to be justified now that the legislative context has been defined and also due to the potential risk of bird strike at Gatwick Airport. It is consequently requested that the policy be amended through the amendment of the BNG requirement to 10%. Current Planning Practice Guidance states: "Plan-makers should not seek a higher percentage than the statutory objective of 10% biodiversity net gain, either on an area-wide basis or for specific allocations for development unless justified. To justify such policies they will need to be evidenced including as to local need for a higher percentage, local opportunities for a higher percentage and any impacts on viability for development." No such evidence has been provided for this allocation and GAL remain concerned in light of the planning application details that have emerged (see below).

Criterion 4f – Reference to 'Gatwick Area'

It is noted that Criterion 4f stipulates that the proposals should not lead to an increased impact on the operations of the Gatwick 'Area' through increased risk of bird strike, or creation of turbulence or lighting which could pose a hazard to the operation of the aerodrome. GAL supports this requirement but requests that the reference to the 'Gatwick Area' be changed to 'Gatwick Airport'.

Policies Map overlap with Land Safeguarded at Gatwick Airport

Whilst Criterion 9 of the policy prevents development within the safeguarded area of search for the Crawley Western multi-modal corridor which could prejudice its delivery, there is no similar requirement relating to the land safeguarded for the expansion of Gatwick Airport. Given the importance of this national policy protection for 'critical' transport infrastructure, it is requested that the need to observe safeguarding of land at Gatwick Airport be expressly stipulated within Policy HA2, or a cross reference should be made to Policy 26.

Engagement with Homes England and Outstanding Matters

Homes England and GAL have participated in discussions leading up to, and since the submission of the Hybrid Planning Application. The level of cooperation has been welcomed. As stated above, GAL submitted representations on that application in November 2025 and June 2026.

GAL acknowledges that Homes England has responded positively to some of the comments that we have made. However, there are significant unresolved issues, notably in connection with the weight to be attached to land safeguarded at Gatwick Airport and the need to secure noise mitigation now for the proposed housing that is likely to be affected by Gatwick Airport operations. It is GAL's position that these matters (and other summarised below) need to be addressed prior to the application being determined. The recommendations that GAL has made for how Policy HA2 should be amended will ensure that this is not simply a request from the airport pursuant to consultations on the planning application, but a formal policy requirement which the Applicant will need to demonstrate that their application complies with – such is the importance of these matters.

Safeguarding of the Land for the Additional Wide Spaced Southern Runway (ASR)

It is GAL's position that the safeguarding of the additional, wide spaced second runway at Gatwick is national planning policy and in the context of any decision to be made on the HCA application, and indeed on the wording for Policy HA2, it is a fundamental material consideration which must be fully taken into account, and any necessary mitigation for development proposed at the strategic site must be designed accordingly.

Homes England's proposition that limited weight should be attached to the safeguarding of land for the ASR is fundamentally flawed and inconsistent with Government policy. Homes England's analysis is partial and

appears to misunderstand the status and importance of safeguarding. Safeguarding of land at Gatwick is a principle which is established in national and local policy and no shades of weight should be attached to this as the ASR is either safeguarded or not. As the land is safeguarded, any development proposed on the Policy HA2 strategic site is obliged to be designed to take account of it and not to prejudice or undermine that safeguarding. There has been no change in national policy or the Gatwick Airport Masterplan since the Regulation 19 stage which would justify a different approach being taken. Consequently, GAL's position on this in relation to Policy HA2 remains.

Noise — Additional Southern Runway (ASR)

It is GAL's position that no residential (or noise sensitive) properties should be built in the 60dB and above air noise contour for the base case, Northern Runway Project DCO scenario (now consented) and the additional southern runway scenario, and that any proposals on the Policy HA2 site must include for effective noise mitigation measures to deal with the effects on the proposed development on future air noise from the safeguarded southern runway at Gatwick Airport. This is also needed to protect future residents as a consequence of the known planned expansion at the airport. Homes England are diminishing the possibility of significant adverse effects arising for future residents when having regard to noise contours for the ASR.

To illustrate this point, approximately 85% of the proposed open space within the proposed development does not meet the BS noise standards for amenity space and approximately 50% of the proposed residential dwellings would not be within a 5-minute walk of a quiet location, as required by the BS guidance. No noise mitigation is proposed in the application with the Applicant instead choosing to reserve this detail for the Reserved Matters Applications stage. It is GAL's view that to do this would be too late given that negative adverse effects are expected. Policy HA2 therefore needs to be explicit to ensure that development (including public open spaces) is limited to that part of the allocation which is outside of the air noise contours for the ASR scenario, or if development is planned within this area, that adequate mitigation must be secured at the planning application stage.

Modifications sought to Policy HA2

The Homes England planning application has only sought to justify exactly why the following modifications to Policy HA2, which remain from the Regulation 19 stage, are essential to protect Gatwick Airport's interests:

1. **Criterion 4** - reduce the BNG requirement from 12% to 10%.
2. **Criterion 4f** - change 'Gatwick Area' to 'Gatwick Airport'.
3. **Criterion 7/Figure 7** - we note that the Main Modifications suggest deleting Figure 7. This is only considered acceptable if Policy HA2 ensures that the issues identified on it are required to be comprehensively addressed as part of any application coming forward on the site. We note that

Criterion 7 of Policy HA2 requires that no residential or other noise sensitive uses are permitted anywhere on the site considered to be exposed to current or potential future aircraft noise level, which is above 60dB LAeq, 16hr; and that Gypsy and Traveller accommodation should be located where noise impacts are not in excess of 57 decibels reflecting the lower level of acoustic attenuation provided by caravans. For the avoidance of any doubt, plans should be included in the Local Plan to illustrate these noise contours including for the Additional Second Runway scenario.

4. **New criterion** - "No development shall occur within the land safeguarded for the expansion of Gatwick Airport as identified on the Local Plan Policies Map which would be incompatible with expansion of the airport to accommodate the construction of an additional wide-spaced runway and related facilities. Proposals must comply with the requirements of Aerodrome Safeguarding as set out in Policy 26 to demonstrate that development complies with Aerodrome Safeguarding requirements to ensure that the operational integrity and safety of Gatwick Airport is not compromised."

GAL remain available to answer any questions that the Inspector may have in connection with the representations that we have submitted to the Local Plan review process.

Yours sincerely



Mark Knibbs
Planning Manager
Gatwick Airport Ltd