Homes England

Statement of Common Ground between Homes England, Gatwick Airport Ltd and Horsham District Council

Version – Final

Date: 30 October 2026



Introduction

1. This is a Statement of Common Ground (SoCG) between Homes England (HE), Horsham District Council (HDC) and Gatwick Airport Limited (GAL). It has been prepared for the purposes of the Horsham District Local Plan 2023-2040 Examination and is offered without prejudice to any formal decision or process undertaken by any party (including the live planning application DC/25/1312). However, the documentation submitted in support of application DC/25/1312 provides a relevant and informative evidence base to inform detailed matters raised by GAL. It summarises concerns raised by GAL in their statement MJBa.02 and the proposed responses proposed by Homes England, HDC and GAL respectively.

2. The purpose of this SoCG is to clarify the positions of the parties and highlight areas of common ground as well as differences which remain. Note that the parties have not been able to agree a common position across all points.

Policy 26: Gatwick Airport Safeguarding

3. The GAL statement MJBa.02 reiterates their Regulation 19 representation against Policy 26: Gatwick Airport Safeguarding. This states that Policy 26 conflates two separate safeguarding issues: the safeguarding of land to accommodate the airport's expansion, and aerodrome safeguarding which protects the safe operation of the airport. It states that these require separate policies as they relate to two very separate matters and apply to different geographical areas.

4. The Examination Inspector has not requested that the Council consider changes to Policy 26. However, as a statement of fact, Policy 26 includes (within the same policy) two distinct parts: firstly, sub-header 'Safeguarding Land for Gatwick Airport' (criteria 1 and 2), and second, 'Aerodrome Safeguarding' (criteria 3, 4 and 5).

Modifications sought by GAL to Policy HA2 and HDC / Homes England response

5. **Table 1** shown overleaf records the respective responses of the parties. In summary, HDC and Homes England do not consider further modifications to be necessary as GAL's concerns are fully addressed in existing policies and by the Policies Map as proposed to be amended. GAL's summary position is that 2 issues are agreed, 1 issue is provisionally agreed but Issue 4 is not agreed and that policy HA2 still requires augmenting as suggested in their response below.

Signatories

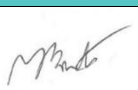
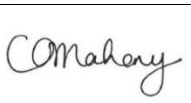
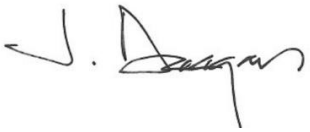
Organisation	Name	Position	Signature	Date
Horsham District Council	Matt Bates	Planning Policy Team Leader		30/10/2026
Homes England	Charlotte O'Mahony	Project Director		30/10/2026
Gatwick Airport Ltd.	Jonathan Deegan	Planning & Environment Lead		29/10/2026

Table 1 – Responses of the parties with regards modifications sought by Gatwick Airport Ltd. to Policy HA2

	Paragraph / Policy Number	Modifications sought to Policy HA2 by GAL	Homes England response	HDC response	Gatwick Airport Ltd response
1	HA2(4)	Change BNG requirement from 12% to 10%	Agreed – as proposed by HDC as MM197 (document MMJB01)	Agreed – as proposed by HDC as MM197 (document MMJB01)	The change proposed by HDC as MM197 is **agreed.**
2	HA2(4f)	Change 'Gatwick Area' to 'Gatwick Airport'	Agreed – to be included as a pre-Adoption minor amendment.	Agreed – to be included as a pre-Adoption minor amendment.	This proposed pre-adoption minor amendment change is **agreed.**
3	Figure 7: West of Ifield Masterplan	Deletion of West of Ifield Masterplan, Figure 7 (MM188 in document MMJB01) is only acceptable if HA2 can ensure that noise sensitive uses are not located where they would be unacceptably exposed to impacts based on the Additional Second Runway Scenario (the 'Additional Wide Spaced Runway (ASR)' proposal).	HA2 as drafted together with the Policies Map secures the requirements as shown in Figure 7. Inset Map 40 shows the 60dB LAeq 16hr noise contour, proposed Gatwick southern runway, Summer Day 2040. HA2(6) specifies no residential etc. uses to be located above the 60dB contour line, and Gypsy and Traveller accommodation must be located where there is not in excess of 57 dB. It is proposed that the 57dB contour line should be added to the policies map to require any future planning application to	HA2 as drafted together with the Policies Map secures the requirements as shown in Figure 7. Inset Map 40 shows the 60dB LAeq 16hr noise contour, proposed Gatwick southern runway, Summer Day 2040. HA2(6) specifies no residential etc. uses to be located above the 60dB contour line, and Gypsy and Traveller accommodation must be located where there is not in excess of 57 dB. It is proposed that the 57dB contour line should be added to the policies map to require any future planning application to	The proposal to add the 57dB contour line to the Policies Map (Inset Map 40) is agreed. Provided this is done, this matter is **agreed.**

	Paragraph / Policy Number	Modifications sought to Policy HA2 by GAL	Homes England response	HDC response	Gatwick Airport Ltd response
			comprehensively address this criterion.	comprehensively address this criterion.	
4	HA2 (New criterion)	Land for the Additional Wide Spaced Runway (ASR) should be specifically safeguarded in Policy HA2. A new criterion should be added regarding safeguarding.	New criterion is not necessary on the basis that safeguarding is addressed in Policy 26: Gatwick Airport Safeguarding and new criterion proposed would duplicate.	New criterion is not necessary on the basis that safeguarding is addressed in Policy 26: Gatwick Airport Safeguarding and new criterion proposed would duplicate. Whilst not required for soundness, HDC is content for the avoidance of doubt to add a cross reference to the supporting text of HA2, (at the end of para 10.94) stating that proposals must comply with policy 26. "*In addition, proposals must comply with Policy 26: Gatwick Airport Safeguarding*".	**GAL do not agree that a new criterion is not necessary.** The Policies Map (Inset Map 40 – West of Ifield) shows the Safeguarded Land at Gatwick Airport and this is supported and agreed. However, neither the Policies Map, nor Policy HA2 specifically cross-reference Policy 26 - which is an omission. GAL maintain that a new criterion should be added to Policy HA2 so that readers of the Local Plan can be left in no doubt as to what the policy requirement is in the event of proposing development in this area. The new criterion should read as follows: "*Any proposals must comply with the requirements of Gatwick Airport Safeguarding Policy 26 to demonstrate that a) development complies with Aerodrome*

	Paragraph / Policy Number	Modifications sought to Policy HA2 by GAL	Homes England response	HDC response	Gatwick Airport Ltd response
					Safeguarding requirements to ensure that the operational integrity and safety of Gatwick Airport is not compromised and b) that 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 an additional wide-spaced runway and related facilities." GAL believe this new criterion is needed for consistency. Whilst Criterion 9 of Policy HA2 specifically 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.