

**Tim Norwood**

Director of Corporate Affairs, Planning & Sustainability  
Gatwick Airport Ltd  
8<sup>th</sup> Floor, Destinations Place  
South Terminal  
Gatwick Airport  
West Sussex  
RH6 0NP

1 December 2021

Dear Mr Norwood

**Horsham District Council's Response to the Gatwick Airport Northern Runway Project (NRP) Statutory Consultation**

Thank you for the opportunity to comment on the Gatwick Airport Northern Runway Proposals.

Horsham District Council welcome the opportunity to comment on this consultation, as the granting of a Development Consent Order for the Northern Runway Project (NRP) has the potential to significantly affect the District in a number of different ways, given its close proximity to the airport. Even without further development at the airport, Horsham District Council faces many pressures, including housing growth which is already placing ever increasing burdens on the District's social and community infrastructure. We are therefore seeking to ensure that should the expansion of the airport take place, these impacts are considered in full with those which arise from the airport expansion and that full mitigation is provided.

We recognise that Gatwick Airport is a highly valued regional economic asset, contributing significantly to the economic success of this region. However, as you will read in the attached response, the Council has very significant concerns with the proposals, which we request GAL explore in further detail. In particular, I would like to draw your attention to the following:

- At this stage we do not consider that your evidence provides robust justification for the need for this expansion. We seek further clarification on your case, ensuring the assumptions and methodologies used are robust and give greater consideration to the potential impacts on air travel from the provision of a third runway at Heathrow Airport.
- There is insufficient clarity regarding your intentions to utilise Route 9 (WIZAD) to meet increased Air Traffic Movements (ATMs ) and how these interact with the changes to airspace which may arise through the FASI South programme. This has significant potential to increase flights over residents of Horsham District and these impacts are not clear.

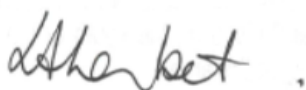
- Wider environmental impacts need greater consideration. This includes greater commitment to carbon and climate change issues, and improvements to the consideration of air quality and transport impacts on Horsham District. This will require bringing forward the promised Carbon and Climate Change Action Plan and the preparation of an Air Quality Mitigation Plan.
- In light of recent developments on Water Neutrality in North West Sussex I also request that the impact on water supply is considered as part of the Cumulative Effects Assessment, given the acute water stress in the region and the water neutrality issues affecting the Sussex North Water Supply Zone.
- It is considered a more refined and targeted approach to assessment of socio-economic impacts, with more detailed assessment of the housing, economic and population effects of the proposals. This needs to give more focus to the authorities most closely impacted by the airport.
- My officers have also noted a number of omissions and errors in the Cumulative Effects Assessment, and request that the impact on development to the Land North of Horsham is taken into account.

In addition to the technical concerns which I outline above, I am particularly concerned that your consultation has not been effective in highlighting your proposed changes to residents in Horsham District, with minimal presence in our District and a high volume of technical documentation with limited summaries. I am therefore very concerned that there will be many residents in the District who will be unaware of the potentially very significant changes increased growth of the airport may bring.

The Council wishes to work positively and proactively with Gatwick Airport Ltd on its application for development consent for the Northern Runway proposals, and to this end, I also request that your engagement with officers at the Council is improved as we move forward, with improved sharing of the evidence base in a timely manner to ensure that we can meaningfully engage in the DCO process

If there are any questions regarding our response, or you would like the opportunity to discuss any of the issues raised in more detail, please do not hesitate to contact my officers.

Yours sincerely,



**Cllr Lynn Lambert**

Cabinet Member for Planning & Development  
Horsham District Council

# **Horsham District Council's Detailed Response**

**to the Statutory Consultation on the**

## **Gatwick Airport Ltd Northern Runway Project**

*Horsham District Council wishes to highlight that the comments provided within this response are made without prejudice to any subsequent comments that we may make. With the exception of some of the consultation material being shared in presentations to the local authorities through Topic Working Groups held in late July and early August this year, neither the consultation documents, nor supporting evidence base, have been viewed by the Council prior to the consultation launch on 9 September 2021. The suite of documents published as part of the consultation amounts to some 2,000 pages and it has therefore not been possible for the Council to comprehensively digest, interpret and assess all of the information within the timescales allowed for consultation.*

*We therefore reserve the right to make further comments as appropriate and raise additional concerns or objections that may not be contained within this response.*

## Table of Contents

Section	Contents	Page
1.0	Executive Summary	4
2.0	Introduction	10
3.0	Details of the Proposal	11
4.0	Other Relevant Airport Development Proposals	12
5.0	Airport Expansion and Cumulative Growth	14
6.0	Existing Flightpath Routes and Potential Impacts of Airspace Changes	17
7.0	Consultation and Local Authority Engagement	20
8.0	Landscape, Local Area Characteristics and Constraints	26
9.0	Local Transport Patterns and Issues	28
10.0	Noise and Air Quality Impacts	32
11.0	Carbon and Climate Change Considerations	41
12.0	Housing, Employment, Economic and Community Matters	43
13.0	Water Environment	52
14.0	Ecology and Nature Conservation	54
15.0	Other PEIR Topics	58
16.0	Cumulative Effects Assessment	60
17.0	<b>Appendices</b> Appendix (i): Map of Land West of Kilnwood Vale Appendix (ii): Map of Land North of Horsham Appendix (iii): Consultation Review for the Host and Neighbouring Authorities, prepared by York Aviation Appendix (iv): Noise Response Report, prepared by AECOM Appendix (v): Air Quality Response Report, prepared by AECOM Appendix (vi): Socio-Economics Response Report, prepared by AECOM Appendix (vii): Traffic and Transport Response Report, prepared by AECOM Appendix (viii): Carbon and Climate Change Response Report, prepared by AECOM Appendix (ix): Review of the Statutory Consultation, prepared by AECOM	65

## 1.0 Executive Summary

1.1 Thank you for the opportunity to provide feedback on this important Statutory Consultation on the Gatwick Airport Northern Runway Project (NRP) that, if implemented, would see dual runway operations at the airport and significantly expanded capacity. The Council sets out in detail our concerns with the proposals and supporting evidence base, along with details of where we feel Gatwick Airport Ltd (GAL) needs to provide further information or undertake further work to support the proposals. In addition to our own assessments, the Council's response has been informed by analysis of the consultation documents by York Aviation and AECOM, undertaken on behalf of the local authorities. These reports form part of our response and can be found within Appendices (iii) to (viii).

### **Understanding the Need Case and the Baseline**

1.2 The Need Case, as currently set out, is very generic, relying on general Government statements about shortage of airport capacity and the benefits of expansion, including airports making best use of their existing runways. It is considered that the sections of the Preliminary Environmental Information Report (PEIR) on the capacity with and without development and on the demand forecasts, lack sufficient cogent detail to validate the Need Case. It is particularly important that GAL sets out a robust justification for the development, explaining how the demand could not be met at Heathrow Airport, in accordance with the Airports National Policy Statement (ANPS).

1.3 The Council is concerned that GAL has put forward a Baseline Case that may be undeliverable, particularly in relation to the assumed increase in runway movement rate, and this potentially undermines the validity of the assessment of the effects of the development if the Baseline is set too high. At this stage, it is not clear if the works required to support the Baseline would require planning permission and so are, in effect, part of the Northern Runway Project. The Council therefore requests much greater transparency over what development is required to support all growth of the airport, including details of which planning permissions exist already and which still need to be secured.

1.4 There is also concern on the methodology by which the forecasts have been produced as this has not been set out. This therefore limits the reliance that can be placed on the demand forecasts. This is material to all of the assessments made that rely on these forecasts.

### **Lack of consideration for the provision of a third runway at Heathrow Airport**

1.5 The Council considers it to be a major flaw that the forecasts now being presented do not take into account the likely provision of a third runway at Heathrow Airport during the 2030s, particularly as this remains Government policy. This is important as GAL needs to demonstrate that the Project is distinct from and not being met by the third runway at Heathrow. There should also be sensitivity analyses around other airports increasing their capacity.

### **Public consultation and engagement with the local authorities**

- 1.6 As we raised in response to the consultation on the draft Statement of Community Consultation (SoCC), the Council is concerned at some aspects of the approach to the Statutory Consultation.
- 1.7 We are disappointed with the lack of face-to-face engagement throughout the 12-week consultation period and we consider the Mobile Project Office (MPO) to have missed crucial opportunities to actively engage the residents of Horsham District, particularly given that our advice for suitable locations for the MPO were initially ignored, then exacerbated by some events being subsequently cancelled in the first week of consultation which meant that the SoCC and details of the MPO visits were out of date for the large part of the consultation. Visits to the District of the MPO were limited, the staff were only able to signpost consultation materials and were not able to provide detailed information. The MPO itself lacked any signage, meaning its purposes would have only been obvious to those who were already aware of its visit to the District.
- 1.8 The Council is concerned about how the use of the Inner and Outer Consultation Zones may have limited awareness in the District amongst affected residents and businesses. Additionally, we are concerned with the wealth of information published, its technical nature and the accessibility of the virtual exhibition, particularly the exhibition boards.
- 1.9 Further to this, the Council has particular concerns about the effectiveness of GAL's engagement with the local authorities. Whilst not requisite to the Development Consent Order (DCO) process, negotiations around the Planning Performance Agreement (PPA) have been slow to materialise placing increased financial burdens on the Council's already stretched finances. The Council is therefore hopeful that the PPA will be agreed imminently and longer-term funding to properly support all the local authorities through this process can be secured.
- 1.10 The Council also has concerns around the opportunities the local authorities were given to properly digest, assess and interpret GAL's evidence base which is an important part of pre-application engagement in helping to shape the DCO application. The technical evidence base is not being shared with the local authorities ahead of the Topic Working Groups which makes it difficult for officers to engage and provide meaningful feedback during the sessions. We would also like GAL to ensure that other statutory consultees, such as the Environment Agency and National Highways, are invited to take part in these Topic Working Groups in future to ensure a more rounded and cohesive approach to stakeholder engagement.

### **Carbon and Climate Change Considerations**

- 1.11 As currently presented, the Council is concerned that the proposals do not give sufficient consideration to their impacts on climate change. The PEIR does not address the Climate Change Committee's requirement that there should be no net expansion of UK airport capacity unless the sector is on track to sufficiently outperform its net emissions trajectory and can accommodate the additional demand. Further to this, the Cumulative Effects Assessment does not address proposals by other airports to increase their capacity, nor Airspace Modernisation.



Additionally, the PEIR does not acknowledge that a demand management policy for aviation is required to ensure that the UK can meet its carbon targets and what this would mean for Gatwick Airport.

- 1.12 GAL states that further analysis will be undertaken in the Environment Statement (ES) and that a Carbon and Climate Change Action Plan is being developed, but as currently presented, there is little information available to scrutinise what mitigation is proposed and how effective this will be. The Council also wishes to understand to what extent GAL has taken into account local authority climate change action plans and commitments and seeks reassurance that a carbon model is produced for the airport to capture data from all operations and journeys to and from the airport.

### **Noise and Air Quality Impacts**

- 1.13 As identified by York Aviation in the report prepared for the local authorities (Appendix (iii)), there is significant concern that it is not currently clear how GAL can achieve the stated 70 Air Traffic Movements (ATM) per hour with the potential implication that the little used WIZAD route (Route 9), which flies over the built-up area to the north of Horsham, the surrounding villages and the strategic allocation Land North of Horsham, could be brought into routine use. The Council seeks clarity from GAL on this important issue and if this is the intention by the airport then the Council considers that it would be necessary to repeat the Statutory Consultation to ensure affected communities are made aware.
- 1.14 Whilst GAL is correct that the proposal to make simultaneous use of the northern runway will not require airspace change, the overall growth in aircraft movements envisaged and growth in activity at other airports, will necessitate some changes in the vicinity of Gatwick Airport as part of the Airspace Modernisation process. This overall dependency should be acknowledged by GAL so as not to mis-lead the public. This is further reinforced by the Scoping Opinion issued by PINS in 2019 which advised that the FASI South programme should remain in scope.
- 1.15 As identified in the AECOM Noise Response Report contained within Appendix (iv) the setting of the Noise Envelope does not reflect the guidance within either the ANPS or CAP1129 guidance. The noise envelope, as proposed, also represents a monopolisation of the benefits of technology by the airport operator, contrary, again, to the ANPS and CAP1129.
- 1.16 There are concerns around Air Quality impacts, specifically more areas within the District need to be considered. The Council is disappointed that there is no discussion of ultrafine particles as initial work around Gatwick indicates residents to the north east of the airport are being exposed to significant levels of these particles. There should be a focus on micro and small particulate matter impacts in hotter weather and affected areas should be mitigated. This may be through the provision of EV infrastructure, for example. There is increasing evidence that a switch to EVs will significantly reduce particulate emissions. The key recommendation to GAL is to prepare a robust Air Quality Mitigation Plan to mitigate and/or offset the airport and airport traffic-related emissions. It is also recommended that specific incentives to increase



the level of sustainable transport are developed for the areas mostly affected by airport traffic including Ifieldwood and areas surrounding the A24 and A264.

### **Socio-Economic Considerations**

1.17 The Council has particular concerns around how the approach to the socio-economic assessment has been undertaken. Whilst the Economic Impact Assessment has, amongst others, used the Gatwick Diamond area (local authorities closest to the airport) as a key study area, which is welcomed, the assessment of the population and housing effects have been based on different study areas. The Council considers that these geographical areas (the Local Study Area and the Labour Market Area) do not allow for sufficient understanding of the housing and community impacts on the districts and boroughs in closest proximity to the airport, including Horsham District. The Council considers that there is a risk that the impact on housing is more localised than currently suggested and that most housing demand will be concentrated in the Northern West Sussex Housing market area, with greater burdens placed on Horsham and Mid Sussex Districts.

1.18 There is also particular concern around the lack of information and analysis on the type of quality of employment that will be created by the NRP and how this impacts housing need. As identified in the consultation documents, the rate of housing delivery in the local area is below the national average and suffers from very high house prices, indicating that housing market pressures already exist in this region. However, GAL has not considered key influences on the housing market such as market signals, affordable housing, or constraints on housing supply. The Council is unclear on the rationale for scoping these out when clearly these are acute issues affecting the Gatwick sub-region. There is concern that the type and quality of employment being created will increase the need for affordable housing and different tenures above what is currently being planned through current and emerging Local Plans and further information and work is required to understand these impacts and any associated housing requirements.

### **Traffic and Transport Considerations**

1.19 The National Trip End Model (NTEM) is used for the Core Modelling to represent all planned growth, with the exception of developments that are classed as “Reasonably Foreseeable”. This is misaligned with how the transport modelling has been undertaken for emerging Local Plans in respect of Horsham and Crawley. If only NTEM is used, and trend-based background growth is assumed, it will not be representative of the likely scale of growth in the area, and the impacts are likely to be significantly under-represented. It is of particular concern that significant development sites, such as West of Ifield, but also those in other local planning authority areas, have been excluded, but key network improvements such as the Lower Thames Crossing and the Croydon Area Remodelling Scheme have been included which could skew the results towards less traffic impacts than is likely to be borne out in reality. The Council is also concerned that “*no more traffic at Heathrow*” is assumed, should a third runway be built and suggest that additional sensitivity testing should be undertaken.

1.20 The provision of an additional 18,500 car parking spaces is queried as there is concern that, at this level, more car-based journeys will inevitably be encouraged which will undermine

efforts to increase sustainable mode share targets. The Council therefore considers that the 60% mode share target will need sensitivity testing with a higher car share mode.

- 1.21 The Council also considers that the complexity of the technical information contained within and supporting PEIR Chapter 12: Traffic and Transport, warrants the production of a robust non-technical summary of sufficient detail to enable interested parties to properly understand the transport assessment and we urge GAL to undertake this additional work to help inform the proposals.

### **The Local Environment: Water and Biodiversity Considerations**

- 1.22 The South East, including the NRP local study area is an area of serious water stress. As part of the Council's Local Plan preparation process, Natural England has advised the Council that abstraction by Southern Water to supply the Sussex North Water Supply Zone, in which all of Horsham lies, is impacting upon the Arun Valley Special Protection Area/Special Area of Conservation and Ramsar site. Natural England has therefore advised the Council and other affected authorities that Local Plan policies should ensure that developments within this Zone do not add to this impact – in other words, that they are “water neutral”.
- 1.23 Whilst it is acknowledged that Gatwick Airport is not within the Sussex North Water Supply Zone and is served by Sutton and East Surrey Water (SES Water), it is still situated within an area of serious water stress. The Council considers that all possible water efficiency measures, including maximising efficiencies for new buildings and operations, as well as the retrofitting of existing buildings, should be clearly identified and implemented as part of the NRP, given the serious water stress in the area. It is also imperative that the Water Environment and Water issues remain in scope in the Cumulative Effects Assessment, given the issues identified in the Sussex North Water Supply Zone.
- 1.24 It is noted that there is no detail of any biodiversity enhancements from the NRP. The Defra Metric v3.0, to ensure compensation is sufficient, should be used to demonstrate Biodiversity Net Gain can be delivered for this NSIP. The Environment Act 2021 places a 10% Biodiversity Net Gain requirement on development unless exempt which extends to NSIPs and will become mandatory by autumn 2023. Opportunities to deliver enhancements need to be explored in consultation with appropriate stakeholders as a mechanism to deliver net gain for biodiversity.

### **Mitigating the Impacts of the Northern Runway Project**

- 1.25 Whilst taking into account the package of measures that was proposed with GAL's bid to the Airports Commission to support its Second Runway proposals and comparing them with the impacts identified in the PEIR and proposed potential mitigation, there is significant concern that the mitigation will be inadequate to address the wide range of impacts that airport expansion at this scale is likely to create. Given that GAL is relying so heavily on the housing trajectories of affected local authority areas and sites such as West of Ifield, to supply the labour growth that will be associated with the NRP, it stands to reason that GAL should contribute to the local infrastructure, such as the Crawley Western Link Road, and to increasing the provision of affordable housing. Consideration should also be given to the impact of the

proposals on the property values of dwelling houses affected by the NRP and this issue should remain in scope, as advised by PINS.

- 1.26 As part of its DCO application, the Council considers that GAL should commit to limiting the airport to a two-runway operation and agreeing to a voluntary cap on passenger throughput, not only for the health and wellbeing of the communities affected by airport operations, but as part of its responsibility and commitments to help address climate change. Releasing the safeguarded land would also provide certainty to the affected communities and businesses and enable alternative uses.

### **Cumulative Effects Assessment**

- 1.27 The Council has had regard to the Cumulative Effects Assessment (CEA) and particularly the approach to considering the in-combination effects of the NRP with strategic development sites in Horsham District and other local authority areas. There are omissions and errors in relation to several sites within the District in the Cumulative Effects Assessment that need correcting and the Council is particularly concerned that Land North of Horsham has been excluded from this assessment. This is a key strategic-scale site with outline planning permission to deliver at least 2,750 homes, a 46,450m<sup>2</sup> business park and community infrastructure, including primary and secondary schools and is sited less than 8km from the airport boundary. It is therefore imperative that this site should be included in the assessment, not least because it meets the CEA criteria but also given the scale of development and its proximity to the airport.
- 1.28 The Council also considers that the PEIR has given insufficient consideration of the temporary impacts on the housing market and economy during the construction phase and particularly the effect of the NRP on the supply of the construction workforce for existing strategic-scale development sites such as Land North of Horsham and Land West of Ifield, should this site be progressed. Consideration of these impacts is particularly important given that GAL is relying so heavily on the housing supply from local authority housing trajectories.

### **Presentation of the 'Next Steps' in the PEIR**

- 1.29 Section 1.9 of the Introductory chapter of the PEIR details the 'Next Steps' that GAL proposes to take. The Council considers that these steps seem very limited currently and consider that it would be more appropriate to set out the next steps by each PEIR topic, detailing what is still required to be undertaken to develop the Environmental Statement (ES). The Council requests that this approach be undertaken for inclusion in the ES.

### **Summary**

- 1.30 The Council acknowledges Gatwick Airport as an important economic asset contributing significantly to the economic success of this region. The Council's agreed position is to strongly oppose additional runway capacity and given the significant matters of concern we have identified; the Council cannot support the Northern Runway Project. The Council considers that it is necessary to address these significant issues and to repeat the Statutory Consultation to ensure maximum transparency with the communities affected by the proposed expansion and to sufficiently support the progress of the DCO application. This response is considered

to accord with the Notice of Motion on Gatwick Airport expansion approved by Full Council on 13 October 2021.

## 2.0 Introduction

- 2.1 This response has been prepared by Horsham District Council to respond to GAL on its consultation on the Northern Runway Project (NRP) and its Preliminary Environmental Information Report (PEIR) in which GAL presents what it considers to be the likely significant impacts of the NRP and the required mitigation. The formal consultation is a statutory requirement under the provisions of Section 42 (Duty to Consult) of the Planning Act 2008 as the development proposed by GAL is a Nationally Significant Infrastructure Project (NSIP). The consultation was launched on 9 September and closes on 1 December 2021.
- 2.2 The boundary of Gatwick Airport lies just 125m to the northeast of Horsham District. Whilst there is no development proposed within the District, the Council considers that the expansion proposed by GAL has the potential to significantly affect the District, its environment and the communities within and the Council is therefore proactively working to ensure the views of the Council are shared at every opportunity. There is no development associated with the Northern Runway Project currently proposed within the District's administrative area and the Council has therefore focused its response on matters of key relevance to the Council's position.

### Background

- 2.3 Gatwick Airport Ltd (GAL) published its Draft Master Plan in 2018 in which it set out three potential growth scenarios for the airport's longer-term future. The scenarios included one where the airport remains a single runway operation but grows through capacity and technological improvements, one where the existing standby runway is brought into routine use and the third scenario where land is continued to be safeguarded for an additional runway to the south.
- 2.4 The Council responded to GAL on its draft Airport Master Plan in January 2019. In July 2019 GAL published its final Master Plan<sup>1</sup> confirming its intention to grow the airport through the growth scenarios and to continue to safeguard the land to the south of the airport for a potential additional runway.
- 2.5 This Council has already responded to previous consultation and engagement exercises held by GAL. This includes the response to the Scoping Report to PINS in September 2019 and, following a pause by GAL on the progression of its Northern Runway proposals due to the COVID19 pandemic, the response to the Statement of Community Consultation (SoCC). As GAL will be aware, 10 local authorities affected by the proposals are working together in responding to GAL's expansion proposals. The 10 local authorities are Crawley Borough Council, along with five other district councils, Horsham, Mid Sussex, Mole Valley, Reigate

---

<sup>1</sup> [Gatwick Airport Master Plan 2019](#)

and Banstead and Tandridge and four county councils, West Sussex, East Sussex, Surrey and Kent. Any references made to “local authorities” in this response therefore references these 10 local authorities.

- 2.6 This consultation response is formed of this document plus the contents of Appendices (iii) to (viii) which are reports from consultants commissioned by the Council and other local authorities. GAL is requested to have regard to the following reports as these form part of the Council's response:

Appendix (iii):	Consultation Review for the Host and Neighbouring Authorities, prepared by York Aviation
Appendix (iv):	Noise Response Report, prepared by AECOM
Appendix (v):	Air Quality Response Report, prepared by AECOM
Appendix (vi):	Socio-Economics Response Report, prepared by AECOM
Appendix (vii):	Traffic and Transport Response Report, prepared by AECOM
Appendix (viii):	Carbon and Climate Change Response Report, prepared by AECOM
Appendix (ix):	Review of the Statutory Consultation, prepared by AECOM

## 3.0 Details of the Proposal

- 3.1 The growth proposed at the airport by GAL has been presented under Scenarios 1 and 2 in the Gatwick Airport Master Plan (2019). As highlighted in paragraph 1.4 of this response, the growth GAL proposes under Scenario 1 has been presented as a distinct option from the growth proposed under Scenario 2 (the NRP).
- 3.2 In terms of the growth in capacity of the airport, GAL anticipates that by 2038, the proposals will increase passenger movements at Gatwick up to 76.6 million passengers per annum (mppa) with 382,000 commercial Air Traffic Movements (ATM) in 2038. This represents an increase of approximately 13.2 mppa compared to a maximum potential throughput based on existing/planned facilities of 62.4 mppa. By 2047, GAL anticipates that airport throughput would increase to 80.2 mppa with the NRP, compared to 67.2 mppa in the absence of the NRP.
- 3.3 Within the DCO process, Horsham District Council is classified as a ‘Neighbouring Local Authority’ as the Council is a neighbouring authority to Crawley Borough Council (‘Host Local Authority’) in whose area the development is principally situated. There is significant development proposed as part of the DCO application which can be summarised as follows;
- Alterations to the existing northern runway, including repositioning of its centreline 12 metres further north to enable dual runway operations;
  - Reconfiguration of taxiways;
  - Pier and stand amendments including a proposed new pier;



- Reconfiguration of other airfield facilities;
- Extensions to the North and South Terminals;
- Provision of additional hotels and office space;
- Provision of reconfigured car parking, including new surface and multi-storey car parks;
- Surface access (highway) improvements;
- Reconfiguration of existing utilities, including surface water, foul drainage and power; and
- Landscape/ecological planting and environmental mitigation.

3.4 Having reviewed the proposals, the Council considers that **the distinction between the growth that is coming forward through the NRP and that outside of the NRP through capacity and technological improvements is not clear cut and requires further detailed consideration**. The Council's current position is expanded upon in Section 5.0 of this response on *Airport Expansion and Cumulative Growth*, robustly supported by the report prepared by York Aviation, on behalf of all the local authorities, contained within Appendix (iii).

## 4.0 Other Relevant Airport Development Proposals

4.1 This section of the response considers other airport development proposals that the Council considers to be relevant in the consideration of the Northern Runway Project.

### **Gatwick Airport's Second Runway Bid to the Airports Commission**

4.2 In 2015 the Airports Commission published its final report<sup>2</sup> on three short-listed options for expanding London airport capacity. One of the options was Gatwick's Second Runway Scheme (LGW-2R), with the other two proposals for a Northwest Runway and an Extended Northern Runway both at Heathrow Airport. The Airports Commission concluded that the Heathrow Northwest Runway was the most appropriate option.

4.3 The Council considers that the proposals for the Second Runway are relevant to the consideration of the Northern Runway Project. At the time, LGW-2R was effectively competing with the schemes put forward by Heathrow Airport to secure expansion at Gatwick Airport, rather than at Heathrow. GAL's bid to the Airports Commission contained a series of 11 pledges for the local community (contained in the Options Consultation Report<sup>3</sup>). These included:

1. A Property Market Support Bond of £131million
2. A £14million Home Owners Support Scheme
3. £3.75million to help create 2,500 new apprenticeships
4. £46.5million to help local authorities deliver essential community infrastructure

---

<sup>2</sup> [Airports Commission: Final Report \(July 2015\)](#)

<sup>3</sup> [Gatwick Runway Options Consultation \(July 2014\)](#)

5. Engagement Charter to support local landowners and businesses affected by proposals
6. Community Flood Risk Forum
7. Local partnerships to target investment in identified regeneration priority areas
8. Continued support of the Gatwick Community Trust and establish a new Community Foundation
9. A £10million Local Highway Development Fund
10. Council Tax Initiative
11. Extension of the Noise Insulation Grants Scheme

4.4 By comparison, the schemes GAL currently propose to mitigate the impacts of the Northern Runway Project are limited to:

1. Noise Insulation Scheme (extended from 63Leq to 54Leq (outer zone)
2. Schools Insulation Scheme (51Leq)
3. Noise Envelope
4. Home Relocation Assistance Scheme (66Leq)
5. Strategic Road Improvements
6. Replacement habitat and open space
7. Employment, Skills and Business Strategy

4.5 Whilst the Council acknowledges that the original LGW-2R proposals would have seen passenger throughput greater than the Northern Runway Project and the second runway was anticipated to generate a much greater level of development outside of the airport boundary, the Council does not agree that the mitigation currently indicated is sufficient to mitigate the wide range of impacts that expansion at this scale is likely to create. As GAL will be aware, the Council raised this concern in the Socio-Economic Topic Working Group held on 19 October 2021. It is not clear how the evidence base for the two proposals can lead to such different outcomes with widely differing mitigation packages, given that the scale of expansion under both proposals is significant. **The Council therefore has significant concern regarding the mitigation measures that are currently indicated and consider this to be inadequate.** More detail is provided in section 5.0 of this response.

#### **Expansion of Heathrow Airport (Third Runway)**

4.6 As highlighted in paragraph 4.2 of this response, the Airports Commission's Final Report recommended a third runway at Heathrow, together with a package of conditions integrally linked to the new runway's approval. The Government's subsequent Airports National Policy Statement (ANPS)<sup>4</sup> sets out the Policy Framework for expansion at Heathrow Airport and the primary basis for decision-making on any development consent application for a new Northwest Runway.

---

<sup>4</sup> [Airports National Policy Statement \(June 2018\), Department for Transport](#)



- 4.7 The expansion of Heathrow Airport is a material consideration in the assessment of the Northern Runway proposals. This is relevant in considering both the impacts of the third runway if it goes ahead and in the case that the third runway is delayed or does not proceed, and appropriate sensitivity testing is required across all these scenarios.
- 4.8 As is highlighted in the York Aviation report (Appendix (iii)), it is considered a major flaw that **the forecasts now being presented do not take into account the likely provision of a third runway at Heathrow Airport at some point in the 2030s. It is considered this needs to be taken into account by GAL in order to fully identify the likely impacts of the proposals and the mitigation required.**

## 5.0 Airport Expansion and Cumulative Growth

- 5.1 The Council has significant concerns around how the growth of the airport through the two growth scenarios in the Airport Master Plan are being presented. There is insufficient detail provided to understand the forecasts and assumptions on passenger growth and need. Further to this, there is contradictory information contained within the consultation material that the Council considers GAL needs to provide more transparency.
- 5.2 The Council is concerned that some growth currently presented under Scenario 1 and therefore outside of the DCO process should actually form part of the DCO. It is difficult to see how some aspects of the growth under Scenario 1 are not intrinsically linked to the delivery of the Northern Runway Project and therefore query whether they can be treated as wholly mutually exclusive.
- 5.3 GAL presents the growth that can be achieved through Scenario 1 (Making best use of the existing runway) principally as a result of three specific factors: (i) growth in runway utilisation in off peak periods (ii) up-gauging of fleet over time to larger aircraft and (iii) higher average load factors (increased occupancy levels on flights). The Council acknowledges that growth of the airport in terms of passenger throughput can take place as GAL have identified through these factors and as they do not constitute development are therefore outside of any planning processes.
- 5.4 However, the Council is of the view that the NRP has the potential to act as enabling development for the growth that is being brought forward under the Scenario 1 growth, thereby creating these conditions highlighted above. If the NRP frees up space on the main runway for further intensification of arrivals then this cannot be seen as additional capacity simply coming through technological or capacity improvements as GAL has cited. As the two elements of growth are not considered separately in terms of a timeline for delivery, **then there should be further transparency around how the growth that will come forward is assessed and allow greater distinction between the two scenarios to be established.**

- 5.5 In 2019, the airport saw pre-COVID passenger throughput at 46.6million passengers per annum and 283,000 commercial Air Traffic Movements (ATMs). GAL anticipates that the airport can grow to meeting passenger throughput of 62.4 million and 318,000 ATMs in 2038 and 67.2million passengers per annum and 326,000 ATMs in 2047 through Scenario 1 alone. This is significant growth outside of the DCO process.
- 5.6 **As the consultation material is currently presented, there is a lack of information and explanation of the Baseline Case and this is not considered robust. Overall, there is concern that GAL has put forward a Baseline Case that may be undeliverable and that this potentially undermines the validity of the assessment of the effects of the development if the Baseline is set too high.**
- 5.7 In Gatwick Airport's Master Plan (2019) (paragraph 5.2.3), it details an increase from 55 ATMs per hour to around 60 movements per hour during peak periods. The planning status of works to support this growth is unclear. Some works may be covered by the airport's permitted development rights, but it is not clear that all of the proposed works could be implemented without requiring planning consent.
- 5.8 It is also not clear the basis for which GAL has determined the Baseline for assessment is an airport handling up to 67.2 mppa based on an assumed runway movement rate of 60 per hour (an increase of just 5 aircraft movements which seems disproportionate to the additional 10 movements through the DCO process but not the corresponding uplift in passenger throughput).
- 5.9 There is also concern as to how the two runways would operate in tandem and how an increase in the hourly combined runway capacity to 70 movements per hour would be achieved. As highlighted by York Aviation, given the applicable rules for the operation of parallel runways separated by 210m, it is not considered that GAL has sufficiently demonstrated that 70 movements per hour is attainable, which has implications for the validity of the forecasts for the NRP. If the increase in hourly movements is not achievable, then the assessed impacts, positive and negative, will have been incorrectly stated.
- 5.10 **At the very least GAL need to explain the deliverability of this capacity uplift as it is currently not clear that it is achievable.** The York Aviation report in Appendix (iii) sets this out in more detail and the Council requests a response to be provided to the questions that York Aviation have submitted on behalf of the local authorities.

### **Establishing the Need for the Development**

- 5.11 GAL relies on the Government's making best use of existing runways (MBU) policy<sup>5</sup> to support its Scenario 2 growth to bring the northern runway into routine use (paragraph 3.3.10, PEIR Chapter 3). GAL also relies heavily on the overall projections of aviation growth for the UK and the Airports Commission and the ANPS on the need for growth.

---

<sup>5</sup> [Beyond the horizon: The future of UK aviation – Making best use of existing runways \(June 2018\), Department for Transport](#)

5.12 However, the Council is concerned that the Needs Case that GAL has presented does not contain sufficient detail to support the development at Gatwick rather than capacity being met elsewhere, such as at Heathrow. Paragraph 1.41 of the ANPS on new runway capacity in the South East of England states that;

*“The Airports NPS does not have effect in relation to an application for development consent for an airport development not comprised in an application relating to the Heathrow Northwest Runway, and proposals for new terminal capacity located between the Northwest Runway at Heathrow Airport and the existing Northern Runway and reconfiguration of terminal facilities between the two existing runways at Heathrow Airport. **Nevertheless, the Secretary of State considers that the contents of the Airports NPS will be both important and relevant considerations in the determination of such an application**, particularly where it relates to London or the South East of England. Among the considerations that will be important and relevant are the findings in the Airports NPS as to **the need for new airport capacity and that the preferred scheme is the most appropriate means of meeting that need.**”*

5.13 GAL considers that passenger volumes will recover to 2019/20 levels by 2024/25 (paragraph 2.4 of the Economic Impact Assessment published as part of the consultation documents). However, there is a lack of alternative scenarios set out, including a third runway at Heathrow Airport, which is current Government policy. **It is therefore imperative that GAL sets out a Need Case that cannot be met by Heathrow.**

5.14 The Council also queries GAL's assumptions that society will simply revert to a pre-Covid world and suggests that this assumption may be mis-aligned with post-Covid thinking and the approaches that Government will need to take to meet domestic targets and the recent COP26 pledges.

5.15 For full commentary on the need for the development, the Council refers to Chapter 3 of the York Aviation Report in Appendix (iii) which sets out in detail the concerns around GAL's Need Case.

### **Scope of the DCO and Associated Development**

5.16 The Council has some concerns regarding the scope of the DCO and what can or cannot be considered Associated Development. Whilst there is no development within Horsham District, we are concerned that there appears to be less supporting infrastructure required to reach the passenger throughput to 62.4 million passengers per annum (additional 15.8mppa) for the growth on the main runway, but a much greater degree associated with the NRP which would increase throughput by 13.2mppa to 75.6mppa. There is significant supporting infrastructure proposed as part of the NRP, including three new office blocks and three new hotels.

5.17 Considering the hotel space alone, 1,000 bed spaces are proposed to come forward with the NRP, however, and as detailed in paragraph 5.2.69 of PEIR Chapter 5, only 250 additional bed spaces are proposed/consented for implementation in the absence of the Project. Put simply, **these requirements do not make sense when considering the growth through the two different scenarios and the Council requests that GAL provides a full and**

**transparent explanation of the requirements for both scenarios and what associated planning consent currently exists (either through permitted development or consents already secured with Crawley Borough Council) and what will need to be secured in the future.**

5.18 The Council has had regard to the DLUHC Guidance on Associated Development that falls within the definition of the Planning Act 2008 <sup>6</sup> and considers that GAL should provide robust justification for any Associated Development.

5.19 Further to this, as the Council sets out in section 4.0 of this response, supported by the work undertaken by York Aviation (Appendix (iii)), there is concern regarding the Baseline Case, sensitivity analysis for different growth trajectories, the methodology for forecasting which has not been set out and doubt around the forecasting and assessment. Given these fundamental concerns around the assessment that GAL has undertaken, it is considered that the proposed mitigation is unlikely to be sufficient to meet the actual impacts of the NRP.

## 6.0 Existing Flightpath Routes and Potential Impacts of Airspace Changes

### Airspace Modernisation

6.1 In paragraph 3.3.2 of the Consultation Overview Document, GAL sets out its view of the Airspace Change required by the NRP. Paragraph 3.3.13, GAL notes that it formally initiated an airspace change process (following the requirements of CAA CAP 1616: *Airspace Change*) regarding the simultaneous operation of the new runway by submitting a Statement of Need. The Civil Aviation Authority (CAA) subsequently confirmed in CAP1908: *Gatwick Airport Northern Runway Project Airspace Change Assigned Level Decision* of May 2020 that as the proposal only adjusted the flightpaths from the northern runway north by 12m, this was not sufficient to constitute an airspace change.

6.2 The CAA also noted, at paragraph 9 of CAP1908 that this proposal was separate from another airspace change proposal submitted by GAL for airspace changes related to the implementation of the Future Airspace Implementation Strategy (South), also referred to as FASI South. Whilst GAL is correct in stating in the Consultation Overview Document (paragraph 3.3.11) that “*the FASI South changes are not required in order to enable a dual runway operation at Gatwick*”, this is somewhat disingenuous as the increase in capacity that FASI South is intended to deliver is required in order to accommodate the overall growth in air travel demand projected by the Government and upon which GAL relies in its Needs Case and demand forecasts.

---

<sup>6</sup> [Planning Act 2008: Guidance on associated development for major infrastructure projects \(April 2013\), Department for Levelling Up, Housing and Communities \(formerly MHCLG\)](#)

- 6.3 Whilst GAL is correct that the proposal to make simultaneous use of the northern runway will not require airspace change, realising the overall growth in aircraft movements envisaged, particularly when growth in activity at other airports across the South of England is taken into account, will necessitate some changes to airspace in the vicinity of Gatwick as part of the modernisation process. **Although the effect of these changes cannot currently be assessed as part of the DCO application, GAL should acknowledge this overall dependency in order not to mislead the public.**
- 6.4 It is understood that the airspace modernisation that is planned through FASI South will see airspace changes implemented in 2029. GAL anticipates that the core airfield works will take five years from 2024 which means that the standby runway will be largely operational from 2029 which sits directly alongside when the airspace changes are anticipated to be implemented.
- 6.5 This is of significant concern to the Council. This timeline appears to align well with the airport's plans, but it does not allow for sufficient consideration or understanding of the impacts on the communities affected by the airport and its future operations. A transparent and open approach must be taken by GAL to ensure that the communities currently affected and those with the potential to be affected are aware of the implications of airspace changes that may come through FASI South as part of this DCO process.

#### **Implications of the Northern Runway Proposals on Existing Flightpaths**

- 6.6 As detailed in the report prepared by York Aviation (Appendix (iii)), there is concern that GAL has put forward a Baseline Case that may be undeliverable. Based on the information contained within the consultation documentation, it is not clear how the runway utilisation could be substantially increased above 55 movements per hour for the bulk of the day.
- 6.7 York Aviation go on to describe that an increased use of LAM or WIZAD SIDs (Standard Instrument Departure Routes) could result in an increase in the achievable departure rate but it is not clear from the noise contours that there is any proposed proportionate change in how the SIDs are used, with the noise contours showing continued negligible use of the WIZAD SID.
- 6.8 On p.9 of the Consultation Summary Document, GAL has stated that *"flights departing from the Northern Runway will continue to use existing flightpaths"*. Firstly, it is not possible for GAL to make this statement with certainty, given the potential changes that could take place through the FASI South airspace modernisation programme. Secondly, the Council is concerned that statement does not actually preclude existing flightpaths that are little used, such as the WIZAD route, from being used much more frequently.
- 6.9 The WIZAD Route (Route 9 on the diagram below) is a little used route that flies directly over the existing built-up area to the north of Horsham town and a number of nearby villages, plus the Council's strategic allocation Land North of Horsham which will deliver at least 2,750 new dwellings, a 46,450m<sup>2</sup> business park and other key facilities including primary and secondary schools.



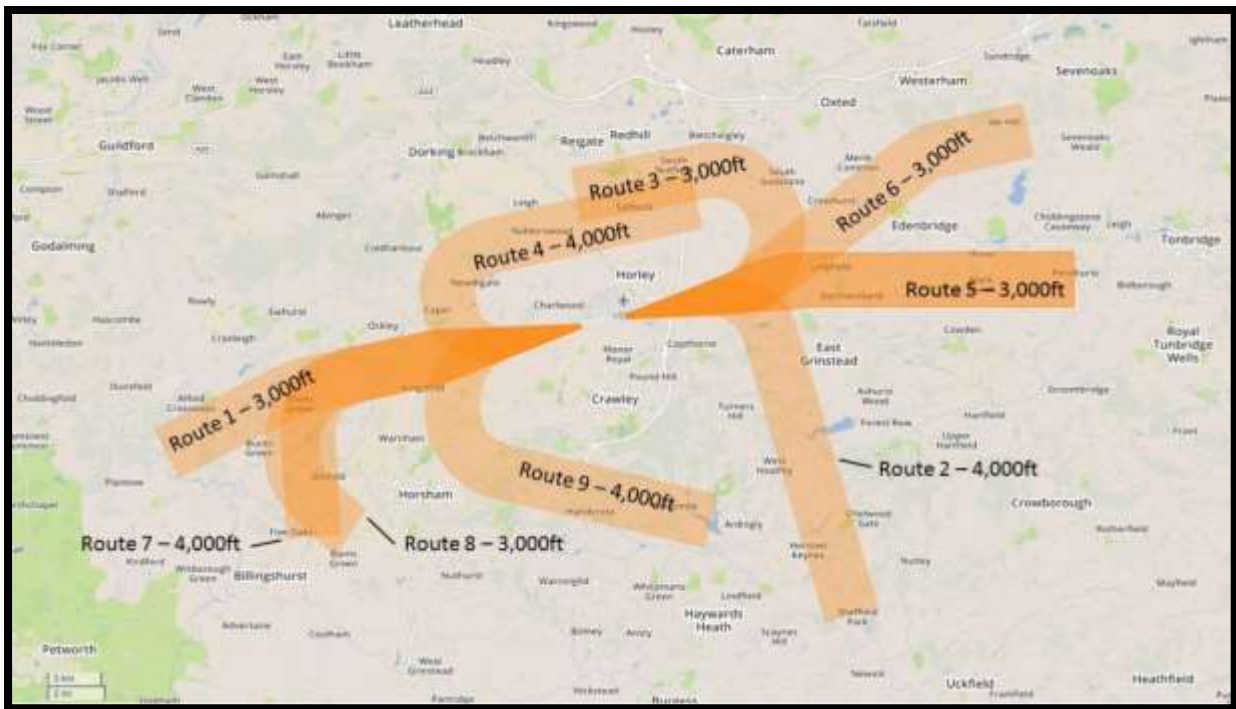


Figure 1. Noise Preferential Routes for Departures.

Source: [www.gatwickairport.com](http://www.gatwickairport.com)

- 6.10 Current use of the WIZAD route is conditional on “tactical offload” and thunderstorms, so in effect, is used very infrequently and principally when Route 4 has specific problems.
- 6.11 Given the issues raised by York Aviation on the lack of clarity about how runway utilisation can exceed 55 movements per hour and the potential for the WIZAD route to be used more, **the Council is very concerned about the potential implications for communities within the District if the WIZAD route is used more frequently. Horsham is not afforded any special protection to prevent overflying in the same way as the towns of Crawley and Horley and this may lead to increased overflight over Horsham and nearby villages plus new residential development at Land North of Horsham.**
- 6.12 **The Council considers that it is therefore imperative that GAL provides clarity on exactly how additional movements for the two growth scenarios (with and without the NRP) will be achieved.** If this is through utilising routes such as the WIZAD route this needs to be communicated in an open and transparent manner to the communities that will be affected.
- 6.13 Currently, GAL’s Statutory Consultation has focused more directly on those living and working within the Inner Zone (see Figure 2) and residents and businesses within this zone have been sent information direct to homes and workplaces in the form of a newsletter. Residents and businesses outside of this zone in the Outer Zone will not have been made directly aware of the Consultation.

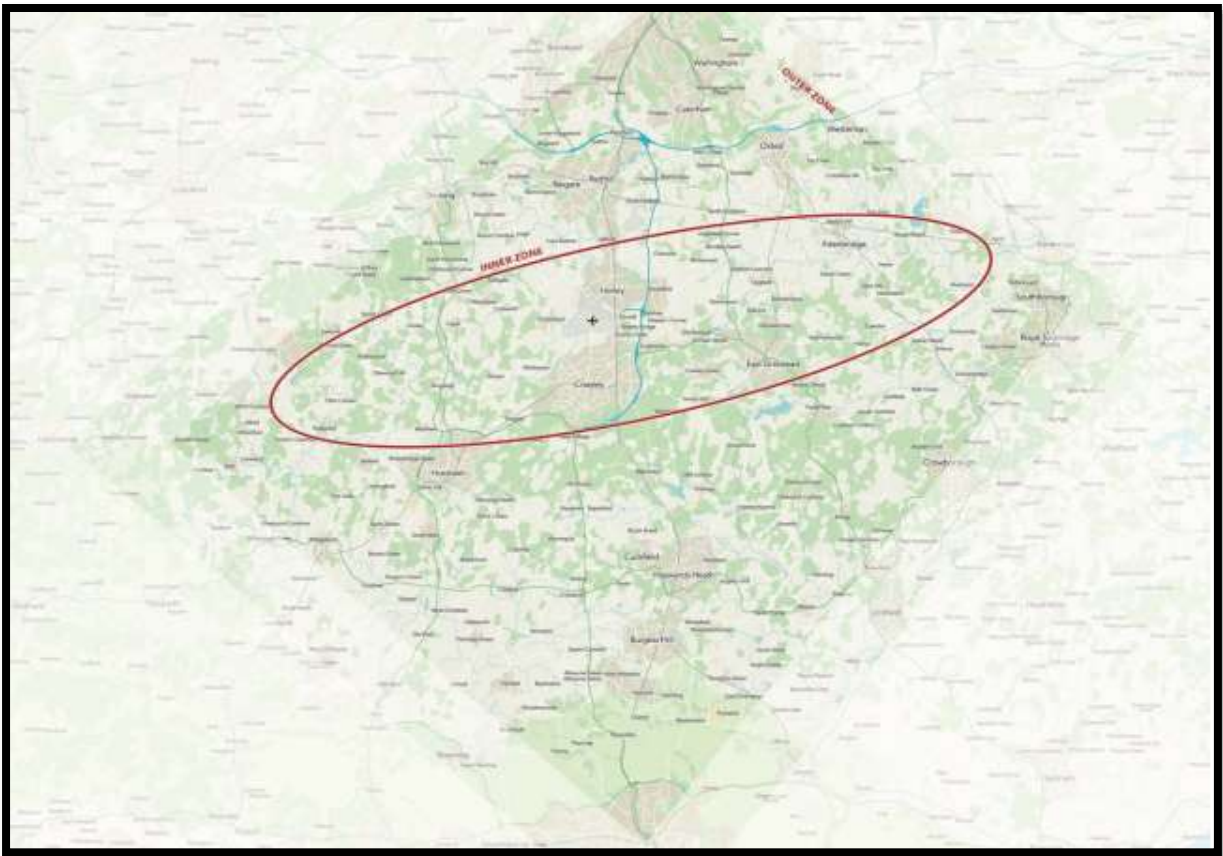


Figure 2: Inner and Outer Consultation Zones

Source: [www.gatwickairport.com](http://www.gatwickairport.com)

6.14 Comparing the Noise Preferential Route (Route 9, the WIZAD) route) with the Inner Consultation Zone, there are residents and businesses that are affected by this route that are located in the Outer Consultation Zone which means they have not been made directly aware of this Consultation. **If GAL envisages that the WIZAD route is to be utilised more frequently to meet GAL's expansion plans, then it is essential that this is effectively communicated to the communities affected by this route.** As GAL will be aware, the local authorities have asked for clarification of route usage through the Topic Working Groups. **If it is the case that the WIZAD route is required to be used more frequently, then the Council considers that it will be necessary to repeat the Section 42 Statutory Consultation to ensure that the communities affected are fully aware of the potential impacts of the proposals.**

## 7.0 Consultation and Local Authority Engagement

### Effectiveness of Engagement through the Statutory Consultation

7.1 It is acknowledged that there will be an opportunity for the Council to provide feedback on the effectiveness of GAL's engagement with the public and other stakeholders through the Adequacy of Consultation Representation that the Council will be asked to provide to the



Planning Inspectorate (PINS). However, we have always stated our intention to work positively with GAL and to provide feedback in an open and transparent way. In this spirit of constructive working, we consider it is important to raise these issues direct with GAL at every opportunity, not just with the Planning Inspectorate at a later stage of the DCO process. Through the Council's response to the Draft Statement of Community Consultation (SoCC), the Topic Working Groups and through communication via our lead Member representing the Council at GATCOM, we have already raised concern regarding the effectiveness of the consultation.

7.2 In light of the concerns set out in paragraphs 6.11 to 6.14 above regarding impacts on Horsham residents and businesses, of particular concern to the Council is the lack of face-to-face events and publicity exercises in public spaces. The Council is cognisant to the challenges of organising consultation activities in a pandemic situation. However, when we provided formal feedback on the Statement of Community Consultation (SoCC) the UK Government had a clear Roadmap out of Lockdown<sup>7</sup> and the consultation was scheduled at a time when all legal limits on social contact would have been lifted, thereby meaning no limit to the number of people allowed to mix in public spaces. We are therefore disappointed that there have been no face-to-face public events (with the exception of four brief visits of the Mobile Project Office to the District) that would have allowed stakeholders and members of the public to speak directly to GAL staff about the airport expansion proposals. It should also be noted that the Council has received notification of similar concerns from other stakeholders in this regard, details of which will be contained within our AoC representation.

7.3 Further to this, there is also concern around the virtual exhibition and the quantity of material. Whilst the virtual exhibition is informative, the exhibition boards are very heavy on text and it is not clear (without clicking) what each exhibition board is about, making it inaccessible. It is also not obvious whether the exhibition boards can be downloaded and read at the consultees' convenience. This results in the room being inaccessible and consultees are not able to get through the whole suite of material as there is too much content on the exhibition boards. **The Council therefore requests downloadable copies of the exhibition boards. We also consider that less text should have been displayed in order to make the exhibition boards more accessible and easier to read.**

#### *The Mobile Project Office*

7.4 Given the lack of opportunities for members of the public to speak to GAL staff face-to-face, there was at least the promise of a Mobile Project Office (MPO) that was scheduled to visit the District on four separate occasions. However, the provision of the MPO has been disappointing for a number of reasons. Firstly, GAL only intended the MPO to act as a distribution point for consultation materials or for staff to help members of the public book telephone surgery appointments. Staff made available at the MPO were only able to signpost the consultation and were not able to answer any technical questions.

7.5 Given that it seems that the MPO was only really intended to be a publicity opportunity to promote the existence of the consultation, rather than to answer any direct questions, it is

---

<sup>7</sup> [COVID-19 Response - Spring 2021 \(Summary\), Roadmap out of lockdown, www.gov.uk](#)

surprising how underwhelming the MPO's presence was. We have received complaints from stakeholders in this regard and below are some pictures of the MPO on a visit to the District.



Figure 3: Mobile Project Office in Horsham Carfax

Source: CAGNE / Warnham Parish Council

7.6 For residents in the District, it is considered that only those who were aware of the MPO visit already through other publicity channels would have realised the purpose of the van; there is no signage on or surrounding the van.

7.7 The Council is also disappointed that our advice on the locations for the siting of the MPO were initially ignored. In the Council's feedback to GAL on the draft SoCC on 28 May 2021, we advised that the Carfax in Horsham town would be the most appropriate location for the MPO visits and provided contact details for Council officers to arrange the appropriate permits within plenty of time. GAL chose to ignore this advice and events were arranged for Waitrose car park. Within the first few days of the launch of the consultation these events were cancelled by Waitrose which meant that the published SoCC contained incorrect information about the MPO visits to the District for the majority of the consultation period. This also resulted in additional officer time assisting GAL to arrange replacement locations.

**7.8 Without prior knowledge of the MPO visit and considering that the published MPO schedule was inaccurate within the first few days of the consultation, the Council**

considers that the MPO has failed to properly alert members of the public to the consultation. Given these issues the Council is very concerned that there is less awareness of GAL's expansion plans among Horsham District residents and businesses.

*Lack of clarity over Hard-to-Reach groups*

7.9 In the Council's response to the draft SoCC issued to GAL on 28 May 2021, we recommended that the SoCC be expanded to provide more detail on what it considers to be 'hard-to-reach' groups and what measures will be taken by GAL to engage these groups.

7.10 The SoCC sets out that *"...mobile project office visits, alternative format materials, advertisements in specific publications, or additional support for those who cannot travel, have limited or no internet access, or who need help to read and understand documents. We will also provide a range of communications channels for anyone seeking information or answers to their questions about our proposals."*

7.11 It does not give specific contact details for requesting materials in other formats, how Mobile Project Office visits can be organised, where adverts are being placed or how people can request support. It also does not list what 'range of communications channels' it is using to reach these groups - it simply says that there are some.

7.12 The Council is concerned that hard-to-reach groups will not be adequately involved in the consultation process and therefore unable to comment on the proposals. **We therefore request further detail from GAL to demonstrate how these groups have been engaged throughout the consultation process.** As we have highlighted in responses on the draft SoCC, Gypsies and Travellers are one of the identified hard-to-reach groups in the District and can be sensitive to noise, given the location and nature of their accommodation. There may also be indirect impacts if noise impacts lead to relocation to unauthorised sites in the District.

*Demonstrating adherence to the Planning Act 2008: Section 47 and 48 Notices*

7.13 The Planning Act 2008 sets out that a S48 notice which publicises the proposed DCO application should appear once in a national newspaper, once in the London Gazette and for two successive weeks in local newspapers. Usually, a SoCC would outline the newspapers that will be used but the GAL SoCC simply says *"statutory notices will be published in line with Section 48 of the Planning Act"*. **Without this information, it is unclear how GAL is meeting the requirements of S48 of the Planning Act 2008 therefore the Council requests evidence of the S48 notices in the requisite newspaper publications.**

7.14 The Planning Act 2008 also sets out that a S47 notice which sets out how the applicant proposes to consult must be published in a newspaper circulating the vicinity of the land. The SoCC does not outline whether this has been done. Again, without this information, **it is unclear how GAL is meeting the requirements of S47 of the Planning Act 2008 and we request evidence of the S47 notice in at least one newspaper in the vicinity of the scheme.**

## **Effectiveness of Engagement with the Local Authorities**

- 7.15 In its SoCC, GAL committed to undertaking reasonable requests for virtual briefings from stakeholder groups. The Council welcomed this opportunity to brief Local Members and parish and neighbourhood councils within the District and we are grateful to GAL for meeting our request, as we know GAL has done for numerous other local authorities.
- 7.16 Whilst we consider that GAL has provided sufficient opportunities to brief community representatives, such as district and parish councillors, there is concern around the opportunities officers are being afforded to fully digest, interpret and assess the proposals. This is a particularly important part of the process due to the technical nature of, not only the NRP and its supporting evidence base, but also the DCO process itself. **The Council also wishes to highlight that the consultation documents in general are difficult to navigate, principally due to the large amount published with limited time to review, but also with the Figures & Drawings and Appendices separated out from the technical chapters which makes cross-referencing very challenging and time consuming.**
- 7.17 As highlighted in paragraph 1.5, there are 10 local authorities proactively engaged in the DCO process and representatives from these authorities form the Gatwick Officers Group that attend the Topic Working Groups that GAL organises to engage officers from across the local authorities on technical matters on a variety of key topics.
- 7.18 These Topic Working Groups have been created to disseminate information to the local authorities and to provide a forum for officers to engage with GAL staff and supporting consultants working on the Northern Runway Project. Initially, Topic Working Groups were held in 2019 before GAL paused the NRP as a result of the pandemic. These Topic Working Groups recommenced in 2021 and opportunities for officers to attend these virtual groups took place prior to the consultation and during the consultation.
- 7.19 The Council would like to share some concern about the nature of the Topic Working Groups. As defined, the title suggests that the events are much more interactive than they actually are. With the exception of the presentation slides shared immediately before the Topic Working Groups, there has been no evidence base studies shared with the Councils prior to these events. This includes the Consultation documentation which constitutes circa 2,000 pages which the local authorities only had sight of at the launch of the consultation on 9 September 2021.
- 7.20 The Topic Working Groups are information-laden two-hour virtual meetings, often with an overwhelming amount of detail shared with officers that provide little opportunity to digest the information and form cogent opinions. **It is noted throughout the consultation documentation that reference is made to the Topic Working Groups held in 2019 and the fact that officers provided “no detailed comments” at these events. The Council wishes to highlight that this is because officers did not have time to review the information prior to the Topic Working Group, rather than any lack of desire to provide feedback.**



- 7.21 GAL has undertaken a series of follow-up Topic Working Groups throughout October and into early November during the consultation, which have been welcomed. However, many of these events have been scheduled, cancelled and then re-scheduled which has implications for officer time, particularly during a limited period of consultation in which officers are tasked with preparing the Council responses.
- 7.22 GAL has asked for questions to be provided in advance of each of the Topic Working Groups and crafted answers are provided at the meetings through a series of slides, with concerns raised by the local authorities often rebutted or dismissed. Requests for further information, particularly the technical supporting evidence base for the Noise and Air Quality topics, have been difficult and slow to access, which affects the local authorities' ability to engage in providing meaningful feedback to GAL to help shape the proposals.
- 7.23 The Council is concerned that the engagement that is taking place with the local authorities is limiting our ability to input effectively into the pre-application process. Paragraph 15 of the Department for Levelling Up, Housing and Communities' (formerly DCLG/MHCLG) Guidance on Planning Act 2008: Guidance on the Pre-application Process<sup>8</sup> states that *"effective pre-application consultation will lead to applications which are better developed and better understood by the public, and in which the important issues have been articulated and considered as far as possible in advance of submission of the application to the Secretary of State."* GAL will be aware that during the Surface Access Topic Working Group on 5 November 2021 the Council requested additional time to respond to the consultation in light of some of GAL's supporting evidence<sup>9</sup> being published part way through the consultation, but this was refused without sufficient reason.
- 7.24 The Council is concerned that GAL's current approach is to control the narrative, and this may have unnecessary and potentially unfair implications for the communities that are affected by the proposals, in whom the local authorities represent, but also the NRP and potentially the progress of the application to the timescales that GAL intend to bring the NRP forward. It is critical that local authorities are afforded sufficient time to review, interpret and assess GAL's evidence base to provide meaningful engagement.

#### *Involvement of Statutory Consultees*

- 7.25 In the Council's response to the Scoping Report issued in September 2019, we strongly considered that statutory consultees such as the Environment Agency, Natural England, National Highways and Historic England should be involved in the Topic Working Groups. To date this has not been the case and we would urge GAL to ensure that key statutory consultees are involved in these meetings moving forward to ensure that key issues can be identified, discussed and addressed cohesively during this important pre-application stage.

---

<sup>8</sup> [Planning Act 2008: Guidance on the Pre-application Process](#), Department for Levelling Up, Housing and Communities (formerly DCLG at the time of publication)

<sup>9</sup> Appendix A Uncertainty Log added to PEIR Appendix 12.9.1, the Preliminary Transport Assessment Report Part 4 added on 1 November 2021.

### *Resourcing Implications for the Local Authorities*

7.26 As already highlighted, the consultation documentation amounts to some 2,000 pages of highly detailed, technical information which is complex and could be challenging for members of the public to understand. Local authorities play a crucial role in representing their local communities, particularly understanding and assessing the evidence base. This requires sufficient funding to support the local authorities through this process and to undertake further work to identify appropriate mitigation measures and suitable infrastructure required to fully address the impacts of airport expansion. **The Council considers that there needs to be a longer-term funding agreement through to Examination and to support local authorities in meeting the discharge of the DCO requirements.**

7.27 For some time, negotiations to put in place a Planning Performance Agreement (PPA) have been taking place between GAL and the local authorities. To date, a PPA has not been agreed, although we believe agreement is imminent which will help to relieve the considerable pressure on all local authorities and to ensure that our contribution can be maximised.

## 8.0 Landscape, Local Area Characteristics and Constraints

### **Landscape Considerations from a Horsham District Perspective**

8.1 It is noted that the current local planning policies for Horsham District Council set out in the Horsham District Planning Framework do not appear to have been taken into consideration and we request that these are taken into account in the assessments.

8.2 The character areas for Horsham District seem to be shown in figure 8.6.2 but these are not shown in the District level Landscape and Townscape Character assessments section or the Effects on Landscape Character Area section within the report. This is within the study area and the effects should be assessed, at least for the K1 Character Area.

8.3 The effect on the tranquillity of the area (how landscape is perceived and experienced by people), is also a factor to be considered as part of the landscape character assessment. The effects of the additional overflights also need to be considered and discussed within the assessment. Regarding the effects on tranquillity within the national designated landscapes, it is noted that up to 2032 the effects are considered with a 20% increase on the baseline. However, the Council is concerned that this does not take into account any changes in overflight that may take place through airspace modernisation.

8.4 As highlighted in the York Aviation report contained within Appendix (iii), there is a lack of clarity about how runway utilisation can exceed 55 movements per hour and York Aviation consider that GAL could seek to use the WIZAD route more frequently to achieve the additional aircraft movements. The Council is requesting clarity on this issue, but we also wish to highlight that any impacts of increased overflight will need to be assessed as part of the Landscape Townscape and Visual Impact Assessment (LTVIA).

- 8.5 Taking into account the LTVIA 5km radius study area, could GAL please confirm where would the effect of the changes in levels of tranquillity for amenity of public open spaces, in the North Horsham development strategic allocation for example, and other open spaces within the Horsham District affected by the flight path would be assessed and considered as receptors so suitable mitigation, enhancement or compensation measures can be put forward.

#### **Land Safeguarded for Future Gatwick Growth**

- 8.6 As part of the Gatwick Airport Master Plan published in 2019, GAL presented a third scenario for growth; one where GAL continues to safeguard land for an additional runway to the south. GAL states in the Master Plan that an additional runway to the south is not *“a scheme that we are actively pursuing, but a ‘future-proofing’ step that we believe is in the national interest”*. This position is further reinforced by GAL in paragraph 3.3.15 of PEIR Chapter 3. Whilst not actively pursuing this option is welcomed, the Council has significant concern regarding the continued safeguarding of this land.
- 8.7 Whilst GAL considers that the Northern Runway proposals align with the Government policy of making best use of its runways, the granting of the DCO will lead to a two-runway operation at the airport and the activity at the airport, in terms of passenger throughput and aircraft movements will be significant. Given our existing concerns raised regarding this proposal, the proposition of a third runway at the airport is something that the Council would be strongly opposed. Not only would a third runway create considerable adverse impacts on the District, its environment, and communities, continued safeguarding of the land limits the land uses.
- 8.8 Whilst the option to safeguard the land does not result in additional growth of itself, the continued safeguarding does demonstrate a possible intent by Gatwick to proceed with plans for an additional full-length runway to the south of the main runway at some point in the future. As highlighted in our consultation response in 2015 to the Airport Commission’s Consultation, Horsham District Council strongly opposes additional runway capacity and this position remains unchanged.
- 8.9 The land safeguarded for an additional runway is a very large area of land, around 700 hectares, some of which falls within Horsham District. Safeguarding the land creates uncertainty and restricts potential development from taking place. From an economic perspective uncertainty is not good for the businesses within the safeguarded area; it stifles investment in those businesses, hinders decision-making and creates an environment where the businesses are unable to grow organically at a rate appropriate for their business. Additionally, maintaining the area of safeguarded land creates uncertainty for homeowners living within or near to the safeguarded area and may blight the sale of those properties. Safeguarding the land also constrains development from happening on the land, potentially reducing the ability to meet local housing and employment demands. This is particularly important in the context of the Council’s Duty to Co-operate. Horsham District has a history of assisting Crawley Borough with its unmet housing need which is due to the Borough’s administrative size and other constraints. The continued safeguarding of land reduces



Crawley's ability to meet its own housing and employments needs which then has implications for neighbouring authorities, such as Horsham.

8.10 Section 11.0 of this response and the AECOM report contained within Appendix (viii) addresses the Council's concerns about carbon emissions created by airport operations and the impact of the proposals on climate change. Nevertheless, given the ever-increasing concern in this arena and the efforts that must be made collectively to tackle climate change, it does not seem feasible that a three-runway operation can form part of the picture for a greener future.

**8.11 The Council therefore requests that as part of its DCO application GAL commits to limiting the airport to a two-runway operation and agreeing to a voluntary cap on passenger throughput, not only for the health and wellbeing of the communities affected by airport operations, but as part of its responsibility and commitments to help address climate change. Releasing the safeguarded land would also provide certainty to the affected communities and businesses and enable alternative uses for the land.**

## 9.0 Local Transport Patterns and Issues

### **Horsham District impacts and further considerations**

#### *Approach to transport modelling*

9.1 The National Trip End Model (NTEM) is used for the Core Modelling to represent all planned growth, with the exception of developments that are classed as "Reasonably Foreseeable" to come forward. This is misaligned with how the transport modelling and analysis have been undertaken in Horsham and Crawley in respect of emerging Local Plans; Horsham District Council and Crawley Borough Council have used specific growth quanta for development within their areas considered likely to come forward through the Local Plan process, even despite there being some degree of uncertainty up until when the Local Plans are adopted.

9.2 It is recommended that this approach is similarly taken for the GAL modelling. If only NTEM is used, and trend-based background growth is assumed, it will not be representative of the likely scale of growth in the area, and the impacts are likely to be significantly under-represented.

9.3 This is of particular concern given the above commentary highlighting that key network improvements such as the Thames Lower Crossing and the Croydon Area Remodelling Scheme (paragraph 7.4.1, PTAR Part 1, Appendix 12.9.1) have been included in the Core Model, whilst developments such as West of Ifield have been excluded – this makes no logical sense and suggests assumptions have been used that skew the results towards less traffic impact than is likely to be borne out by reality. It is noted that sensitivity tests are being considered for the DCO, but by then it will be too late for other parties to meaningfully comment – the sensitivity tests should be front loaded, if key sites are to be excluded from the core modelling.

9.4 In PTAR Appendix B Table 7.1.2 data from the Council's current Local Plan, the Horsham District Planning Framework (HDPF) is used. This is compared with the Standard Housing Methodology target of 897 (minimum to be delivered) and current preferred scenario of 1,100 dwellings per annum (dpa).

9.5 Given that the HDPF is now beyond five years after adoption, this should no longer be used as the baseline. The Council has a Government-imposed housing target set through the Standard Housing Methodology which is currently 897dpa (note this figure can fluctuate overtime). The emerging Local Plan which was considered at the Cabinet Meeting of 15<sup>th</sup> July 2021 identified a potential housing target of 1,100dpa. It is insufficient to assume NTEM growth rates to represent traffic impacts of future growth. The transport modelling can only be robust if it properly assesses the cumulative impact and takes account of future strategic sites.

#### *Impacts of the NRP on Junction 10 of the M23*

9.6 It is reported by GAL that the M23 Junction 10 is likely to see a "slight reduction" in traffic throughput compared (presumably) to the baseline. GAL state that this is as a result of improvements to Junction 9 (Gatwick spur road). This conclusion seems to conflict with evidence emerging from Horsham and Crawley transport modelling which suggests Junction 10 is close to / overcapacity assuming respective Local Plan growth is implemented. Further discussions between the transport consultants for the respective local authorities and GAL will therefore need to take place to identify likely impacts on the junction and risks (e.g. National Highways objection). As it is presented currently, the Council consider there is inadequate information provided as we cannot assess the credibility of claiming no impact on Junction 10 without seeing the relevant transport modelling output, together with a full list of model assumptions.

#### *Additional car parking requirements associated with the NRP*

9.7 With reference to PEIR Volume 3 Appendix 12, paragraph 11.2.15 to 11.2.19 (Car Parking Strategy) there is concern that such a significant increase in on-site parking as is proposed (c.18,500 spaces) will inevitably encourage more car-based journeys to the airport and undermine efforts to increase sustainable mode shares. It is suggested that the on-site ratio of spaces compared with expected passengers will increase, but that the overall ratio taking into account off-site parking will decrease. However, this assumes a meaningful reduction in off-site spaces, and there is a huge lack of certainty as to the effectiveness of efforts to enforce against unauthorised / unofficial off-site parking.

9.8 In light of the comments in the 'Key Issues Table'<sup>10</sup> under 'Consequences' it is clear there is a tension in the parallel concerns held by the local planning authorities regarding parking. On the one hand, there is concern that under-provision of staff car parking (i.e., no net increase) in light of growing passenger numbers could result in overspill and unauthorised parking off-site in surrounding areas. On the other hand, increasing spaces on-site by 18,500 will encourage greater numbers to travel by car, resulting in congestion on local roads.

---

<sup>10</sup> See Key Issues Table contained in Appendix A of the AECOM Traffic and Transport Response Report contained within Appendix (vii) of this response

9.9 As detailed in Section 12.6 of the PEIR documents and the PTAR (Appendix 12.9.1), GAL is targeting a 60% mode share for sustainable modes of transport. Given the concerns raised over the additional car parking capacity proposed to be delivered on-site, the Council considers that the 60% mode share needs sensitivity testing with a higher car share.

**9.10 The Council considers that there is inadequate information provided. In order to give an informed view, a considered strategy for balancing on- and off-site parking, to include consideration of charging regimes, needs to be provided as part of a comprehensive Transport Assessment and Travel Plan.**

*Consideration of road traffic impacts on Horsham District*

9.11 Paragraph 12.9.104 of PEIR Chapter 12 states that “analysis indicates that around 75% Gatwick traffic uses the M23 Spur accordingly this is where highway improvements have been proposed”. The Consultation Overview Document also states that “typically, over 75-80% of airport-related traffic approaches Gatwick from the M23 Spur in peak periods”. The Council considers that presenting the use of the M23 Spur in this way is misleading as it downplays the use of other routes to the airport. It is acknowledged that the M23 Spur will be the principal route for the latter part of a journey, but this is not the case for the whole journey. For example, one might expect that many airport users and staff travelling through Horsham District, using the A24 then the A264 for example, would then join the M23 to access the airport. Whilst the access to the airport is provided via the M23 and would form part of this 75-80%, the impacts on the roads within Horsham District (both on the major connecting routes, but also the rural roads) seem to have been excluded from the analysis and commentary provided. Currently mitigation for road transport impacts has solely focused on the roundabouts immediately serving the airport and the Council does not agree that this provides sufficient mitigation for the impacts that may be experienced over the wider area, including in Horsham District. The Council is concerned that insufficient consideration has been given to key routes within the District such as the A24, A29, A264 and A272 plus the rural routes and it is crucial that further analysis of these wider impacts, and details of necessary mitigation is provided in order to properly address the environmental impacts.

*Modelling of increased traffic at Heathrow Airport*

9.12 It is noted that in PEIR Chapter 12, paragraph 12.11.3 “no more traffic at Heathrow” is assumed, should a third runway be built. The Council queries how realistic this is. The provision of a third runway at Heathrow Airport is Government policy and therefore is currently anticipated to be delivered. Whilst the narrative from Heathrow Airport is a “no more traffic” scenario, this is yet to be properly scrutinised through the Heathrow DCO process so it is considered that additional traffic as a result of a third runway should be included in the transport modelling.

*Engagement with Horsham District Council on transport issues*

9.13 The Council notes Table 12.3.2 in PEIR Chapter 12 on the *Summary of Consultation* with key stakeholders on traffic and transport issues. The Council is very concerned that the engagement that has taken place seems to have consistently excluded Horsham District

Council. Significant development within the District could have cumulative impacts with the NRP and these need to be properly understood and the Council is best placed to provide the appropriate inputs on development within the District. As currently presented, we do not consider that there has been sufficient engagement with the Council on surface access and transport issues.

#### *Complexity of Surface Access and Traffic Consultation Material*

9.14 The Council is concerned at the complexity and sheer volume of information published in association with PEIR Chapter 12 to support the conclusions that GAL has made on surface access and transport issues. The S42 consultation is a statutory part of the DCO process and must ensure that members of the public and key stakeholders are sufficiently informed about the proposals and feel able to respond. The information is very difficult to understand, and this is concerning considering that the majority of respondents will not have technical transport knowledge. There is a c.2-page summary of environmental effects on Traffic and Transport in the PEIR Non-Technical Summary and a similar summary in the Consultation Overview Document, but neither of these are considered detailed enough. **The Council therefore considers that a robust non-technical summary of sufficient detail should be produced to ensure that interested parties feel enabled to understand the transport assessment and associated conclusions on the impacts and proposed mitigation.**

#### *Additional requirements from GAL to support Transport Strategy*

9.15 It is noted in PEIR Volume 3, Appendix 12, paragraph 1.2.1 that “a draft Airport Surface Access Strategy (ASAS) and Travel Plan will be included in the final Transport Assessment (TA)”. It is also noted in PEIR Volume 3 Appendix 12 paragraph 11.2.17 that “3,300 spaces are to reduce off airport parking from 6,300 to 3,000 spaces.”

#### **9.16 In order to reach an informed view, the Council flags the need for following:**

- A draft Transport Assessment, draft Air Surface Access Strategy (ASAS) and Sustainable Travel Plan to be available for comment ahead of the formal DCO application, to include:
- A core modelling scenario to include all growth likely to come forward (i.e. West of Ifield, Horley Business Park etc.) by way of a ‘worst case scenario’ that takes account of cumulative impacts, transparent assumptions and appropriate sensitivity tests
- A clear breakdown and analysis of existing and proposed staff and passenger car parking respectively, including the nature of provision and relevant charging / restrictions
- A strategy for reducing off-airport parking from 6,300 to 3,000 spaces
- Confirmation of mode share targets, and the impact these will make against a ‘business as usual’ scenario
- A strategy to achieve those mode share targets, including consideration of maximising opportunities for connecting new growth areas and existing populations to the airport (for example new multi-mode link from A264 to A23 i.e. the Crawley Western Link Road)
- A package of funded mitigation improvements that go well beyond just on-site / spur road highways and other improvements, worked up in collaboration with local planning authorities
- Presentation of the above in a non-technical summary report.

9.17 In addition, it is recommended that a Statement of Common Ground is sought with National Highways and Network Rail respectively, taking account of the cumulative impacts of housing growth etc., to demonstrate that these have been taken account of.

### **West Sussex County Council Transport Comments**

9.18 The Council has had regard to the West Sussex County Council Cabinet Report<sup>11</sup> and the WSCC Detailed Comments on the PEIR<sup>12</sup> and as the Highways Authority for Horsham District and the wider West Sussex area, we wholly support and endorse their comments.

## **10.0 Noise and Air Quality Impacts**

### **Noise Impacts**

10.1 The proposal to bring the northern runway into use for daytime routine airport operations impacts Horsham District in several ways, principally regarding increased overflight.

10.2 The information on noise presented in Chapter 14 of the PEIR together with technical appendices present a significant volume of material of a technical and complex nature. The data provided with respect to the noise was poorly presented and additional noise contours were requested from GAL. The delay in receiving these further compressed the time for local authorities to respond to the consultation.

10.3 Given the reduced timescale and the lack of discussion prior to the commencement of the consultation, Horsham District Council has obtained support from consultants with expertise in aviation forecasting and aircraft noise. This has been undertaken in partnership with other local authorities.

10.4 Detailed considerations of the noise impacts are provided in the AECOM report attached in Appendix (iv) of this response. The consultants have posed additional questions to GAL, but these responses have yet to be received at the time of writing. A summary of the key issues is provided below.

### **Aircraft noise**

#### *Adoption of a Noise Envelope*

10.5 The key control measure with respect to controlling overflight noise promoted by GAL is the adoption of the Noise Envelope. The concept of the noise envelope for managing airport expansion is set out in the ANPS. Guidance on the adoption of a suitable noise envelope is also provided in the Civil Aviation Authority's report CAP1129 Noise envelopes<sup>13</sup>.

---

<sup>11</sup> [Report to Cabinet: Gatwick Northern Runway Project: approval of consultation response](#), 16 November 2021, West Sussex County Council

<sup>12</sup> [Appendix C: Detailed Comments on the Preliminary Environmental Information Report](#), 16 November 2021, West Sussex County Council

<sup>13</sup> [CAP1129: Noise Envelopes \(December 2013\), Civil Aviation Authority \(CAA\)](#)



10.6 GAL has considered that a noise envelope of 51dB (LAEQ 16 hour) is appropriate for the northern runway development. This noise level represents the Lowest Observable Adverse Effect Level (LOAEL) for aircraft noise currently recognised in national guidance documents

*Concerns identified with proposed noise envelope*

10.7 The consultants appointed by the Council have identified that the setting of the noise envelope does not reflect the guidance within either the ANPS or CAP1129. These shortcomings are set out below:

**Lack of consultation on noise envelope**

10.8 In Appendix 14.9.5 of the consultation, section 4.3.1 identifies that GAL has not developed the noise envelope through consultation as required by the ANPS.

10.9 Section 5.60 of the ANPS states that *“an envelope should be tailored to local priorities and include clear noise performance targets” and “the design of the envelope should be defined in consultation with local communities and relevant stakeholders.”*

10.10 Comments from community groups have highlighted that they consider a noise metric which monitored the magnitude and frequency of impulsive noise should also be included. The Council supports this approach and would suggest that N60 and N65 should be further considered.

**Sharing the benefits of future improvements**

10.11 Section 5.60 of the ANPS also requires that the benefits of future technological improvements should be shared between the applicant and its local communities, hence helping to achieve a balance between growth and noise reduction.

10.12 CAP 1129 comments *“to incentivise noise reduction such that the benefits are shared between industry and local communities, noise envelope limits could be dynamic. For example, as aircraft technology improves, the noise contour limit could reduce or tighten at a predefined rate in conjunction with a steady increase in the numbers of permitted ATMs.”*

10.13 From the data provide by GAL the Council’s consultants have identified that the area of the proposed noise envelope will not decrease as quieter aircraft come into the fleet. Instead, the area of noise contour remains static into the future, allowing more aircraft to operate. This is a continuation of the current operating regime at Gatwick where there has been no appreciable decrease in the 54dB<sub>LAEQ</sub> contour over the last decade.

10.14 In addition, the modelled slow transition to quieter aircraft will lead to an increase in the contour area. Any noise envelope should be designed to prevent this. No further reduction in the noise envelope is detailed after Air Traffic Movements (ATMs) exceed 382,000. Based on the current predictions this shows no further sharing of technology benefits from 2032. The noise envelope as proposed represents a monopolisation of the benefits of technology by the airport operator contrary to both CAP 1129 and the ANPS

### **Enforcement of Noise Envelope**

- 10.15 No mechanism for the performance of the noise envelope has been detailed. The adoption of an LEQ as the sole control measure is a concern, due to the difficulty in both monitoring and managing the implementation of the noise envelope. GAL has previously identified difficulties with monitoring the 54 dB contour and the issues are likely to be compounded for the 51 dB contour.
- 10.16 Identifying the breaches of the noise envelope only as they occur implies a wholly reactive approach which is not sufficiently protective of local communities. Consideration should be given to adopting additional metrics which would give an early warning of potential exceedance of the noise envelope.
- 10.17 This could be by using additional noise contours such as the N65 contour or by using QC counts as a surrogate predictor of performance. For example, if 80% of the QC count is exceeded, this could trigger review measures and implementation of local control measures. This approach is supported by the conclusions set out in Chapter 7 of CAP 1129 that an envelope is likely to be defined by a combination of parameters.

### **Review Period is not defined**

- 10.18 Section 5.60 of the ANPS comments that suitable review periods should be set in consultation with the parties mentioned above to ensure the noise envelope's framework remains relevant. This requirement is not discussed in detail in the noise report. Appendix 14.8.62 notes GAL will report on performance within the noise envelope annually and set in place internal management processes to forecast performance in the years ahead.
- 10.19 The Council is supportive of an  $L_{Aeq}$  based contour. However, the community concern about high impact impulsive events caused by aircraft overflights demonstrates consideration of other metrics are necessary. A noise monitoring and management scheme should be brought forward to demonstrate how the airport will track its performance.

### **Assessment of Significance of Impacts**

- 10.20 The Air Noise Assessment Methodology uses a population metric to define significant of impacts asset out in table 14.4.4. This is based on assessment criteria used in the Heathrow PEIR and this is not considered valid for comparison, as this is a rural and less densely populated area. The use of a population metric derived for the development of Heathrow Airport seeks to minimise the absolute magnitude of impact.

### **Airspace Change**

- 10.21 The concerns expressed by community groups regarding the proposed development are linked to airspace change. It is proposed to maintain the existing Noise Preferential Routes (NPRs) for departing aircraft. Aircraft movements are proposed to increase up to 70 movements per hour but there is no indication in the Scoping Report whether the departure routes can comfortably manage this flow, especially during periods when departures dominate.



10.22 York Aviation, the aviation consultant working on behalf of local authorities has confirmed that the proposal to make simultaneous use of the Northern Runway will not require airspace change. However, the consultant has concluded that *“realising the overall growth in aircraft movements envisaged, particularly when growth in activity at other airports across the South of England is taken into account, will necessitate some changes to airspace in the vicinity of Gatwick as part of the modernisation process. Although the effect of these changes cannot currently be assessed as part of the DCO application, GAL should acknowledge this overall dependency in order not to mislead the public.”*

10.23 The N65 noise contour plots provided by Gatwick for 2032 clearly show an increase in this contour along the Route 9/WIZAD route which is currently only used during period of congestion of the airport when compared to the 2019 data for the same metric. This indicates an intensification of aircraft turning due south along what is currently an infrequently used Tactical Offset Route

10.24 More detail should be provided in the ES on departure route usage, and in particular, the use of the WIZAD departure route.

### **Ground Noise Assessment**

10.25 From the information provided no receptors in Horsham District will experience significant increases in ground noise due to the development. AECOM, the noise consultant working on behalf of local authorities, has recommended that the following additional information is provided:

- Sound power levels applied to auxiliary power units (APUs);
- Sound power levels applied to engine ground running; and
- Details on how  $L_{Amax}$  noise levels have been calculated.

### **Construction Phase Noise impacts**

10.26 The review undertaken by AECOM has not identified any receptors in Horsham District who are likely to experience significant increases in noise during the Construction Phase. Vibration impacts have not been assessed.

10.27 Again, the consultant recommended that the following additional information is provided on the construction phase in the Environmental Statement (ES):

- Clarification in the ES regarding the potential for construction traffic movements at night
- Details on construction activities taking place during each construction assessment period
- Details on assumptions on plant for construction activities
- Details on predicted construction noise levels during each assessment period
- Embedded mitigation will be secured in the Code of Construction Practice (CoCP); however, there is discussion regarding “additional mitigation”, which is not defined in the PEIR. As the “additional mitigation” is that secured by the CoCP, it should be part of the

main assessment and not identified as additional. Detail on mitigation assumptions should also be in the ES

- The assessment should take into account the potential for periods of overnight highways work
- Details should be provided in the ES if receptors that are predicted to experience noise levels exceeding the LOAEL but below the SOAEL experience a significant increase.

## **Road Traffic Noise**

10.28 The review of the road traffic noise impacts has determined that the study area for road traffic noise is not explicitly defined. Accordingly, there is some uncertainty over the roads assessed. It is assumed that the assessment is limited to the study area from the Traffic and Transport assessment (Chapter 12 of the PEIR).

10.29 There is a significant concern that development will increase in road traffic 'spillage' from the main highways to the side roads and country lanes for airport trips. Even though the total noise will not be comparable to the main roads, the increase can be large and proportionally more disturbing due to its close proximity to residents and that it is made up by multiple 'events' rather than a general "hum".

10.30 It is therefore considered that an assessment should be made of traffic flows on local roads and how this traffic is associated with Gatwick and how it can be mitigated. The current methodology for this the assessment set out in para 7.8.42 is ambiguous and needs to be clarified and other receptor points on the local road network agreed with local authorities to establish the impacts.

## **Air Quality Impacts**

### **General Comments**

10.31 A request to GAL for the air quality modelling files that underpin the PEIR including source apportionment data was made following the publication of the PEIR<sup>14</sup>. The files requested did not require additional work by GAL but were simply data that would have been produced for the PEIR documents. A series of 'chase' emails were made over the subsequent weeks and the data finally arrived on 15 October 2021, just under five weeks after the original request was made, which has limited the time available to look at the data and meet the consultation deadline. Further data which was 'missed' from the original data set arrived on 27 October 2021 (just over six weeks from the original request). As GAL will be aware, the local authorities requested additional time to respond to the consultation at the Air Quality Topic Working Group on 4 November 2021, given the delays providing the requested information, but this was dismissed without sufficient justification.

10.32 It is understood that the consultants intend to re-run the traffic models underpinning the air quality assessment for the Environmental Statement (ES); this was confirmed in the meeting of the Topic Working Group on 4 November 2021. Consequently, the air quality model will be

---

<sup>14</sup> Email from Horsham District Council to GAL on 13/9/21

revisited, which may affect the air quality assessment conclusions for all the modelled scenarios.

- 10.33 In the 11kmx10km domain (key modelled area) all roads with available traffic data have been modelled. For areas outside of the key modelling area (the so called “wider study area”) the model was run for discrete receptor locations only, within 200m of screened in roads selected by screening predicted increases in traffic flows against IAQM/EPUK guidance thresholds. This data will have to be checked when it becomes available to ensure that all affected links have been included in the assessment.
- 10.34 With the exception of Ifieldwood, most of Horsham District’s area lies outside of the 11kmx10km “domain” area; thus the limited number of receptor points modelled are receptors located along those roads where traffic data was available and which were screened in for assessment and which include the following roads in the north part of the District: the A24, A264 and A272 through Cowfold.
- 10.35 The number of receptors is different between the scenarios; the consultants confirmed that the roads for which there was no available traffic data were excluded; presumably such a situation could only arise where the predicted traffic increases were negligible – however that remains to be confirmed.
- 10.36 Storrington AQMA was not included in the model, presumably due to a negligible change in traffic flows on the A283; however, this should be checked once the data becomes available.
- 10.37 Gridded outputs from the model (pollutants contours) were not included in the PEIR assessment but will be prepared for the final ES assessment.
- 10.38 It is important to note that while the PEIR shows an overall improvement in air quality despite the airport’s growth, increases in emissions from the airport itself and airport-related traffic were observed for the Construction 2029 and Operation 2032 scenarios.
- 10.39 The Consultation Overview Document states<sup>15</sup> that “*for all future year scenarios 2024, 2029, 2032 and for 2038 (aircraft emissions only) no significant effects are expected.*” However, it is also important to note that the current UK air quality standard for NO<sub>2</sub> of 40 µg m<sup>-3</sup> was set over 20 years ago based on the World Health Organisation (WHO) standard at that time. The WHO recently reduced the recommended annual limit value for nitrogen dioxide from 40 µg m<sup>-3</sup> to 10 µg m<sup>-3</sup> based on a better understanding of the impact of nitrogen dioxide on human health. Similarly, the new recommended guideline value for PM<sub>2.5</sub> is now 5µm/m3. It must be envisaged that UK air quality objectives for NO<sub>2</sub> are likely to be tightened in the next decade and follow the recommendations made by WHO.

---

<sup>15</sup> PEIR Consultation Overview Document paragraph 8.10.8, p.123

10.40 As roadside receptors have been modelled to exceed these guideline values in 2018 and all future scenarios, the predicted increases due to the aircraft and aircraft traffic related emissions will have an impact on health.

10.41 It is disappointing to see that there is no discussion of ultrafine particles within the air quality chapter given airports are a significant source of ultrafine particles<sup>16 17</sup>, the evidence of their health impacts<sup>18 19</sup>, and that initial work around Gatwick<sup>20</sup> indicates residents to the north east of the airport are being exposed to significant levels of these particles.

10.42 Also, the ES needs to examine the impact of Pier 7 APU emissions on the surrounding area allowing for a potential doubling of days above 25C during the summer, to evaluate the potential benefits of pre-conditioned air being installed at this pier when it is constructed.

### **Baseline 2018**

10.43 The 2018 scenario includes all receptors that have been modelled at any scenario.

10.44 It is not known which model verification zones have been assigned to which monitoring sites/zones. One question is whether out of Horsham receptors along the A24 and A264 were verified with monitoring data from inner Horsham, which would result in an incorrect model verification factor. It would be more appropriate for the applicant to have carried out their own monitoring at relevant locations to fill in gaps in the Council's monitoring.

10.45 Model uncertainty remains an issue in the Cowfold AQMA: although the average RMSE in the Cowfold zone is 7µm, the difference between monitored and modelled concentrations at the worst-case site (Cowfold 7n at Huntscroft Cottages) is 13µg, which is a significant underestimation. This site should be revisited in the model.

10.46 It is recommended that the statistical analysis of the model performance includes a comparison of the modelled road nitrogen oxides (NOx) contribution against monitored road NOx contribution, as advised by the TG (16) guidance. This comparison has not been provided and it appears that the model may be significantly under-predicting results at some of the sites e.g. Cowfold 7n. It is also recommended that other statistical parameters including the fractional bias and correlation coefficient, are also presented, to give a full picture of the model performance, in line with the recommendations of the TG(16) guidance.

<sup>16</sup> Atmospheric Environment 45 (2011) pp.6526 – 6533

<sup>17</sup> Atmospheric Environment 50 (2012) pp.328 – 337

<sup>18</sup> Janssen, N.A.H. *et al.* (2019) Research into the health effects of short-term exposure to ultrafine particles in the vicinity of Schiphol Airport. RIVM report 2019-0084 <https://www.rivm.nl/en/bibcite/reference/323511>

<sup>19</sup> Weichenthal, S. *et al.* (2020) Within-City Spatial Variations in Ambient Ultrafine Particle Concentrations and Incident Brain Tumors in Adults. *Epidemiology* v.31(2) pp.177-183.

<sup>20</sup> Ultrafine Particles in the Vicinity of Gatwick: Report by Reigate and Banstead BC. Report to GATCOM Steering Group June 2020.

10.47 Defra's background concentrations used in the model were not verified against local monitoring.

10.48 The model has shown that airport-related emissions in 2018 were negligible across most of the modelled receptors in the District apart from Ifieldwood (NO<sub>x</sub> contributions within the range of 0.5-1.0  $\mu\text{m}/\text{m}^3$ ) and Faygate (NO<sub>x</sub> contributions of up to 0.5 $\mu\text{m}/\text{m}^3$ ). Regarding airport traffic emissions, those were shown to be most affecting the A264 in the Faygate area (NO<sub>x</sub> contributions within the range of 2-4  $\mu\text{m}/\text{m}^3$ ).

10.49 PM<sub>2.5</sub> concentrations have been modelled to be within the range of 10 to 12 $\mu\text{m}/\text{m}^3$  (well exceeding the WHO-recommended guideline value of 5 $\mu\text{m}/\text{m}^3$ ) at all receptors along the main roads; these higher concentrations are presumed to be due to the impact of road traffic. Receptors at Ifieldwood - not located on major roads - have been modelled to have lower PM<sub>2.5</sub> concentrations, within the range of 8 to 10 $\mu\text{m}/\text{m}^3$ .

10.50 Particulate matter concentrations were not verified against local monitoring.

#### **Construction 2024 Scenario**

10.51 For Horsham District, only Ifieldwood receptors have been modelled for this scenario, presumably because the traffic screening criteria were not met and so the remaining areas were screened out of assessment. This should be confirmed with the consultant.

10.52 The overall impacts on NO<sub>2</sub> concentrations in Ifieldwood have been modelled as negligible – increase of below 0.1 $\mu\text{m}/\text{m}^3$ .

10.53 In terms of PM<sub>2.5</sub> concentrations, the impacts across all modelled receptors but one has also been shown to be below 0.1 $\mu\text{m}/\text{m}^3$ . One receptor on Rusper Road has shown an increase of 0.1 $\mu\text{m}/\text{m}^3$ .

#### **Construction 2029 Scenario**

10.54 For the Construction 2029 scenario the highest impacts for NO<sub>2</sub> were predicted in the Ifieldwood area (up to 0.2 $\mu\text{m}/\text{m}^3$ ); this is due to an increase in the emissions of road traffic, both airport and non-airport related. Receptors on the A24 and A264 have shown increases equal to or below 0.1 $\mu\text{m}/\text{m}^3$ . Interestingly, the concentrations at the Cowfold receptors have shown a slight decrease, presumably due to a decrease in airport traffic related emissions; the reason for this should be confirmed with the consultant.

10.55 The increases in PM<sub>2.5</sub> concentrations have been shown to be below 0.1 $\mu\text{m}/\text{m}^3$  for all the receptors modelled.



### Construction Dust

10.56 The comments in the Air Quality Construction Phase Mitigation appendix are noted<sup>21</sup> on *“holding liaison meetings with other high risk construction sites within 500 m of the site boundary to ensure plans are coordinated and dust and particulate matter emissions are minimised.”* With this in mind it would be useful if the construction dust buffer maps Figures 13.9.1 to 19.9.12 could be presented in terms of project phasing, so that all of the sites operating at a given time and thus potentially overlapping could be seen on one map.

10.57 Under the dust mitigation measures (Table 13.8.122) it states, *“dust monitoring during construction will also be undertaken should it be required.”* Given the scale of the proposed Project, dust monitoring must be installed at the start of the Project to establish a baseline and run throughout the duration of the works in that area to check that the dust management plan(s) are working in practice.

10.58 In the absence of such an approach it is unclear how the performance of the dust management plans will be assessed, given that an absence of complaints from residents does not necessarily indicate the lack of a dust problem.

### Operation 2032 Scenario

10.59 The increase in NO<sub>2</sub> concentrations for this scenario was modelled to be up to 0.2µm/m<sup>3</sup>; this level of change has been predicted for the receptors in Ifield Wood and on the A264 and was due to the impacts of airport-related emissions, as well as road traffic emissions, both airport and non-airport related. The receptors on the A272 have been shown a negligible increase of below 0.1µm/m<sup>3</sup>.

10.60 The increases in PM<sub>2.5</sub> concentrations have been shown to be below 0.1µm/m<sup>3</sup> for all the receptors modelled.

### Air Quality Damage Cost and Air Quality Mitigation

10.61 The costs calculated by the Transport Analysis Guidance (TAG) method in The Economic Impact Assessment (EclA) of the PEIR were estimated at £114.6m. This figure reflects the whole of the area modelled and has not been disaggregated into specific areas, however it marks out the cost of total air quality action that the affected districts would expect to be taken to mitigate the emissions associated by the Northern Runway Project.

10.62 **The key recommendation is for the applicant to prepare a robust Air Quality Mitigation Plan to mitigate and/or offset the airport and airport traffic-related emissions. The Preliminary Environmental Information Report Chapter 13: Air Quality advises that a Construction Traffic Management Plan will be developed to mitigate impacts from the construction activities while the Airport Surface Access Strategy and Travel Plan will manage traffic during the Project’s operational phase. There is no mention of mitigating**

---

<sup>21</sup>PEIR Appendix 13.8.1 Air Quality Construction Phase Mitigation paragraph 2.3 3<sup>rd</sup> bullet point

<sup>22</sup> P36 PEIR air quality assessment (chapter 13) table 13.8.1

**emissions from the airport itself, and as those have been showed to contribute to the NO<sub>2</sub> levels at the modelled receptors those emissions should also be addressed.**

10.63 Based on the existing assessment results which have shown the highest increases in NO<sub>2</sub> concentrations to occur at Ifieldwood and the receptors located along the A264 and A24, those areas should be prioritised for investment in Electric Vehicle (EV) charging infrastructure. I would advise that the applicant makes provision for NO<sub>2</sub> monitoring at Ifieldwood and locations adjacent to the A24 and A264.

10.64 It is recommended that specific incentives to increase the level of sustainable transport are developed for the areas mostly affected by airport traffic including Ifieldwood and areas surrounding the A24 and A264.

## 11.0 Carbon and Climate Change Considerations

11.1 GAL has taken a conservative approach of not including sustainable aviation fuels, efficiency savings or zero emission aircrafts in its projections for increasing to carbon emissions. The PEIR anticipates that passenger numbers will increase from 62.4 million passengers per annum (mppa) without the project to 75.6 mppa if the NRP is implemented.

11.2 The approach in the PEIR is that emissions will increase but, in 2038, only represent 3.9% of the total Sixth Carbon Budget (which covers the years 2033-37) for 2037.

11.3 Although the PEIR claims that this is acceptable, the Committee for Climate Change in its Sixth Carbon Budget report on Aviation<sup>23</sup> notes that if airports expand this would require capacity restrictions elsewhere to achieve the balanced pathway i.e., carbon reductions of 78% by 2035. This aspect is not addressed in the PEIR. The PEIR says 'Compared to the last year of the Sixth Carbon Budget (2037) the in-scope emissions (domestic and international) for 2038 are estimated as 7.575MtCO<sub>2</sub>e per year – equivalent to 3.9% of the national emissions target for **that year**' - which year? 2037 or 2038? It is highly likely, if the direction of the Net Zero Balanced Pathway is followed, that the emissions budget for 2038 will be lower – figure 1.1 of the CCC Sixth Budget Report shows 10% lower, which would increase the 3.92% to 4.35% of the national budget for 2038. Furthermore, the section on cumulative impacts does not address proposals to increase capacity at other airports or the airspace modernisation review.

11.4 15.4.57 states *“reporting of aviation emissions in units of CO<sub>2</sub> (rather than CO<sub>2</sub>e as for other emissions) is in line with guidance from the CCC.”* (The CCC 6<sup>th</sup> Carbon Budget only uses units of CO<sub>2</sub> when discussing CCS.) No source to justify this statement is provided. In contrast, the Sixth Carbon Budget supporting document on aviation uses CO<sub>2</sub>e as standard. Whilst this paragraph acknowledges that, *“GHG emissions do not include non-CO<sub>2</sub> impacts of aviation”* there is no attempt to calculate or include these. This seriously underestimates the global warming effects of the proposed increase in flights.

<sup>23</sup> [The Sixth Carbon Budget: Aviation \(2020\)](#)

11.5 The PEIR states that in 2038 emissions from all sources are 7.575 MtCO<sub>2</sub>e compared to a future baseline projection of 6.188 MtCO<sub>2</sub>e. AECOM has undertaken assessment of Carbon and Climate Change issues in the PEIR on behalf of the Council and the report is contained within Appendix (viii). In this report AECOM acknowledges that this is a conservative estimate, as the projections do not include any potential mitigation measures e.g., use of sustainable aviation fuel for future flights. Most of the increase in GHG emissions are predicted to come from the increased number of flights. From this assessment the report concludes that the project would not have a material impact on the ability of the Government to meet its carbon reduction targets. However, the Committee for Climate Change recommended to Government in the Sixth Carbon Budget report on Aviation<sup>24</sup> that a demand management policy for aviation is required to ensure that the UK can meet its carbon targets. It states that;

*“The Government should assess its airport capacity strategy in the context of Net Zero and any lasting impacts on demand from COVID-19. Investments will need to be demonstrated to make economic sense in a Net Zero world and the transition towards it.*

- *Unless faster than expected progress is made on aircraft technology and SAF deployment, such that the sector is outperforming its trajectory to Net Zero, current planned additional airport capacity would require capacity restrictions placed on other airports.*
- *Going forwards, there should be no net expansion of UK airport capacity unless the sector is assessed as being on track to sufficiently outperform a net emissions trajectory that is compatible with achieving Net Zero alongside the rest of the economy and is able to accommodate the additional demand and still stay on track.”*

11.6 This is not acknowledged in the PEIR. In paragraph 15.9.48 the suite of factors to reduce emissions does not include demand management but other technological solutions, which were identified in the DfT Jet Zero: our strategy for net zero aviation<sup>25</sup> consultation. It also does not appear that any account has been taken of the cost of carbon and future abatement measures in the forecasts which make them inconsistent with the Government's Jet Zero proposals.

11.7 The PEIR only gives high level information on mitigation. This is acknowledged by AECOM. GAL states that further analysis will be undertaken in the Environment Statement and that a Carbon and Climate Change Action Plan is being developed. The result of this is that there is very little information available to scrutinise what mitigation is proposed and how effective this will be for not only reducing emissions but also adapting to the changes to climate that will occur. This is picked up in CC-CCR-10 of the AECOM report (Appendix (viii)) for minimising the impacts of extreme weather events.

11.8 The Council asks whether GAL's 2040 Net Zero targets have taken into account local authority climate change action plans and commitments and whether any work has been

---

<sup>24</sup> [The Sixth Carbon Budget: Aviation, Climate Change Committee](#)

<sup>25</sup> [Jet zero: our strategy for net zero aviation \(July 2021\), Department for Transport](#)

undertaken to align local targets with GAL's plans. The Council requests that GAL undertakes further work to understand the impacts of airport expansion against these plans and explores opportunities to provide synergy with them as part of its mitigation. The Council would also like reassurance that there would be a carbon model produced for the airport which captured data from all operations and journeys to the airport so carbon can be measured to underpin target achievement.

## 12.0 Housing, Employment, Economic and Community Matters

### **Housing and Population Effects**

#### *The Study Areas*

12.1 How the study areas, methodology and assumptions have been defined to determine the impacts are an area of significant concern. As detailed in Diagram 1.2.1 Study Area contained within Appendix 16.6.2: Assessment of Population and Housing Effects the 'Study Area' has been broken down into the "Labour Market Area by Local Authority" (17 local authorities made up of 14 local authorities plus Elmbridge, Epsom and Ewell and Chichester because these three areas overlap into Housing Market Areas). The Labour Market Area is defined based on the application of the 75% commuting threshold used by the ONS for defining Travel-to-Work Areas (TTWAs).

12.2 Whilst it is acknowledged that there will be employees who travel from Brighton and Hove or Eastbourne, for example, a much greater proportion will be from areas closer to the airport, including more employees travelling from Crawley, Horsham, Mid Sussex, Mole Valley, Tandridge and Reigate and Banstead. **It is considered that the current approach fails to adequately capture the impact on those local authority areas most affected by the proposals.**

12.3 As detailed in paragraph 16.4.7 of PEIR Chapter 16, the "Local Study Area" incorporates *"the whole of Crawley and parts of Horsham, Mid Sussex, Mole Valley, Reigate and Banstead and Tandridge"*. As currently presented, the Council considers that this is misleading in terms of Horsham being included in this area as the small part of Horsham that falls within the "Local Study Area" is a very rural part of the District and there are no Horsham settlements contained within this area. In contrast to these study areas, the Economic Impact Assessment then uses the Gatwick Diamond and Coast 2 Capital LEP area. Using these different study areas is confusing and the Council considers that GAL should take a more robust and consistent approach across these socio-economic assessments.

12.4 The Council is very concerned that, as how the socio-economic impacts have been currently assessed, the true impacts on Horsham District will have not been adequately captured or overlooked. The Labour Market Area is too large to properly understand the impacts on the District and the Local Study Area does not contain enough of Horsham District to understand the impacts either.

- 12.5 It is noted that for the work that was undertaken to support the LGW-2R proposals as part of the Airports Commission Study, the published “*Employment and Housing Technical Report (2014)*” defined the Diamond Authorities/Gatwick Diamond Districts as 60% of the airport workforce (at the time) lived within the six authorities (Mole Valley, Reigate and Banstead, Tandridge, Horsham, Mid Sussex and Crawley) that formed this area (with 80% within the wider study area).
- 12.6 The majority of staff working at Gatwick do live close to the airport therefore it is considered that a similar approach would be more appropriate than the currently defined Study Area of 17 authorities. Particularly as the current approach may dilute some of the actual impacts on the authority areas in closest proximity and potentially most affected. This finer grain analysis is also considered important as it is recognised in the consultation documentation that lower skilled employees are more likely to live closer to the airport.
- 12.7 It is further considered that this approach fails to take account of significant pieces of work that local authorities have undertaken to date. For example, the Economic Growth Assessment (2020), undertaken by Lichfields (same consultant for GAL’s work) on behalf of Crawley Borough Council, Horsham District Council and Mid Sussex District Council identifies the Northern West Sussex Function Economic Market Area (FEMA) as operating within a spatial extent that is largely consistent with the authority boundaries of Crawley, Horsham and Mid Sussex, with comparatively weaker economic linkages with adjoining areas such as Coastal West Sussex, Reigate & Banstead (e.g. Horley) and East Sussex. Crawley TTWA which incorporates the Borough of Crawley, as well as Horsham and Mid Sussex Districts, with less strong relationships with parts of neighbouring Surrey Districts such as Reigate and Banstead and Mole Valley (and Tandridge but this was not highlighted in the EGA).
- 12.8 We would note that the approach taken by GAL has to an extent resulted in some key local circumstances becoming ‘lost’ when subsumed into the alternative study areas. For example, the PEIR notes that for the Labour Market Area and Five Authorities Area, workplace earnings are lower than resident earnings across, suggesting that people out-commute to higher paid jobs. This does not however reflect the position in Crawley, where wages of the in-commuting workforce are greater than that of the resident workforce, reflecting the local skills issue that is a particular priority for Crawley.
- 12.9 In addition to the PEIR, GAL has published a supporting Gatwick Economic Impact Assessment (Oxera, 2021) that provides additional information. This document bases its analysis on different study areas to those of the PEIR, including the established areas of the Gatwick Diamond (incorporating Epsom and Ewell, Mole Valley, Reigate and Banstead, Tandridge, Crawley, Mid Sussex, and Horsham) and the Coast to Capital LEP (the Gatwick Diamond authorities plus Croydon, Brighton and Hove, Lewes, Worthing, Arun, Chichester, and Adur), in addition to the Five Authorities area covered in the PEIR. Whilst the recognition of the established Gatwick Diamond and Coast to Capital areas is welcomed, it does raise a question as to why these areas, in addition to the established Northern West Sussex Functional Economic Market Area, are not used for the PEIR.



12.10 Broader alignment with work already undertaken by local authorities would offer better opportunities to understand and compare the findings. As an example, the Northern West Sussex Economic Growth Assessment (EGA) draws upon forecasts from Oxford Economics, with further sensitivity testing undertaken through consideration of Experian economic forecasts. It is unclear therefore how the Cambridge Econometrics data used for GAL's work relates to or cross-references the existing economic evidence of the Councils. There is also concern regarding the growth/jobs/business assumptions that have been made and the use of 2019 (Local Plan preparation economic data) produced by Lichfields. The Council considers that the current economic situation data would need to be incorporated to provide a more accurate basis on which to build assumptions.

12.11 **It is therefore considered that a more focused assessment of the socio-economic impacts of the NRP on the six local authorities that are in closest proximity to the airport (e.g., using something similar to the Crawley TTWA) is required.** Assessment of the socio-economic effects of the NRP should be based on data that better aligns with local authorities' evidence base (this is considered particularly important given that GAL is insisting that there will be no significant population or associated housing effects). We would advise that additional sensitivity testing is undertaken using Experian forecasts to enable greater compatibility between the studies.

12.12 As has been correctly identified by GAL in paragraph 4.3.4 in Appendix 16.6.2, the delivery of housing in Crawley is constrained and relies on neighbouring authorities of Horsham and Mid Sussex to meet some of the housing needs. Paragraph 6.2.1 of Appendix 16.6.2 states that additional demand is not expected to create pressure on the housing supply of any particular authority. However, additional demand generated by the NRP will need to be accommodated in wider Districts/Boroughs. GAL considers that existing trajectories still allow for surplus labour supply according to paragraph 5.2.7 of Appendix 16.6.2, **however the Council considers that there is risk that the impact on housing is more localised than Appendix 16.6.2 suggests and that most demand will be concentrated in the Northern West Sussex Housing Market Area, with greater burdens placed on Horsham and Mid Sussex Districts. As already identified the study areas, as currently presented, would fail to capture these impacts properly.**

*Conclusions on the population and housing effects as a result of the NRP*

12.13 GAL considers that local housing growth trajectories are sufficient to accommodate the job growth from the NRP. The Council does not agree with this as no housing trajectory modelling at a local authority level has been undertaken to include any housing growth triggered by Gatwick expansion.

12.14 There is significant concern that GAL has undertaken the assessment of the socio-economic impacts from a purely 'numbers-based' approach i.e. local planning authorities are planning for the houses, therefore the workers will be provided based on the uplifted numbers the Government is expecting local authorities to deliver, excluding analysis of key issues such

as market signals, affordable housing or constraints on housing supply. **This approach is considered to be too simplistic and further work is required to better understand the impacts of the NRP on the housing market in the Gatwick sub-region.**

- 12.15 Paragraph 1.2.12 of the Population and Housing Effects study states that *“the report does not analyse the full range of inputs required when determining local housing needs or requirements at a housing market area or local level (such as market signals, affordable housing or constraints on housing supply)”*. The Council is unclear of the rationale for this as these factors do affect housing delivery. As highlighted in paragraph 16.6.1 of Chapter 16: Socio-Economics, the Local Study Area, the Labour Market Area and the Five Authorities have all seen *“population growth exceeding the national average”*. However, in paragraph 4.2.1 of the Population and Housing Effects study GAL identify that *“In 2020, there were an estimated 1.08m homes in the study area. Over the last 20 years the number of homes in the study area has increased at a slightly slower rate on average compared to England...”*
- 12.16 Whilst the population in the study area exceeds the national average, the rate of housing delivery is slightly below the national average and this points to constraints on housing supply that this region experiences. This is further reinforced by the findings detailed in paragraphs 16.6.84 and 16.6.85 of Chapter 16 which highlights that the median average price rose 53% over 10 years in the local study area, compared to 38% nationally. This indicates housing market pressures already exist. It is therefore not appropriate to set aside the constraints that do exist in this region and simply assume that this will automatically deliver a level of housing somewhere between housing trajectory projections and housing targets defined by the Standard Method, without further detailed analysis.
- 12.17 The Council does not agree that the approach GAL has taken to present the ‘worst-’ and ‘best- case’ scenarios accurately capture the housing that may come forward in the study area to 2038. It is considered that taking projections from the local planning authority housing trajectories will not necessarily give a ‘worst-case’ scenario and analysis should also be undertaken to assess the average housing delivery rates from all the local authorities over the last 7-10 years and projecting these forward to 2038. This may provide a more accurate picture of housing delivery and better reflect some of the constraints on housing delivery that the current assumptions may fail to capture.
- 12.18 It is also considered that GAL has failed to acknowledge the importance of the airport in driving the local economy and therefore the housing and infrastructure that is required to support it. Even if the step change in housing delivery does not require further housing to be added to the housing coming through Local Plans to 2038, this does not negate the fact that the NRP will act as an economic driver in the region. Local planning authorities can plan for the housing that is required by the Government’s Standard Method, but ultimately the delivery of housing is driven by the market. The NRP is likely to speed up the delivery of housing, placing greater pressure on transport networks and social and community infrastructure than might have happened without the NRP and therefore this needs to be acknowledged and explored and an appropriate contribution – as was identified in the Airports Commission bid – put forward to support local authorities.

*Requirements for affordable housing and different housing tenures*

12.19 There is no information provided on type of jobs created (e.g. skills level, profession, pay etc). It is noted that this issue was raised by local authorities in response to the Scoping Report in 2019 and in Appendix 16.3.1: Summary of Stakeholder Scoping Responses GAL state that this is provided in Chapter 16, 16.9, but no breakdown is provided.

12.20 As currently presented, it is considered that there is a lack of proper analysis of the type and quality of employment that will be created and how this impacts housing need. The current approach fails to take account of the type and quality of employment being generated at the airport and how this translates into the need for different types of housing. Understanding the types of jobs created by the NRP and whether they are low/high skilled is important as there are knock-on impacts on the location and type of housing demand. If the large proportion of employment being created is unskilled/semi-skilled then this is likely to generate an increased need for more affordable housing or different housing tenures, including increasing pressures on the private rented sector. The type of jobs directly linked to the NRP appear to be lower paid/entry level. This would indicate additional demand for affordable housing over and above the levels currently allowed for within local authority current and emerging Local Plans.

**12.21 The Council therefore considers that GAL needs to provide baseline data on the impact of low paid employment growth on affordable housing needs.**

*Lack of acknowledgement for the impact of the NRP on social and community infrastructure*

12.22 There is concern as to how the Study Areas have been used to assess the community impacts. The effects on facilities and services and cohesion are assessed at the Project Site Boundary and Local Study Area levels only (which both exclude the vast majority of Horsham District). However, the larger Labour Market Area and Five Authorities Area have been used to assess the labour and population impacts. The Council considers that this approach is not sufficient and considers that the impact of additional construction and permanent workforce (during construction and operation phases) on community should be considered at the same level as labour market and population impacts as additional workers will not be contained within the local study area and use services where they are located.

12.23 As highlighted in paragraph 4.3 of this response GAL proposed £46.5million to help local authorities deliver essential community infrastructure as part of its bid to the Airports Commission for a second runway at the airport. Whilst the Council acknowledges that the proposals are somewhat different, the Council does not consider that the experiences of local communities from these proposals will vastly differ in terms of impacts on social and community infrastructure, that a lower level of funding is needed to mitigate impacts.

12.24 Labour supply and housing growth are inextricably linked. Part of the rationale for Homes England identifying this site is its location within the Gatwick Diamond, in which the airport is a key economic driver. Similarly, in its Standard Overview Briefing, GAL describes a natural fit for the location of West of Ifield by identifying that this site lies within four miles of the 3,200 jobs that will be created by the NRP. **The scale of growth that GAL is proposing is significant and the Council strongly contends that GAL should contribute to mitigating**

**the impacts on social and community infrastructure as a result of the labour requirements driven by the NRP.**

12.25 If progressed and West of Ifield does indeed provide appropriate housing for future Gatwick Airport staff this will place an additional burden on the existing infrastructure, such as the transport network, schools and healthcare facilities. Should development be located to the West of Ifield, the Council has a vision for a sustainable development with ambitious mode share targets, particularly given the site's proximity to Crawley. However, to manage the increasing traffic pressures the need for a link road between the north of Crawley and the A264 has been identified. Homes England would be required to deliver part of the Crawley Western Link Road as part of the West of Ifield proposals.

12.26 **Contributions from GAL towards the delivery of the wider link road to mitigate the impacts of the NRP are considered essential, along with increasing the provision of affordable housing on West of Ifield and similar sites, amongst other contributions towards social and community infrastructure.** The type of jobs directly linked to the NRP appear to be lower paid/entry level which would indicate additional demand for affordable housing over and above the levels allowed for within local authority Local Plans. Whilst the Council is not expecting GAL to deliver the same mitigation package as the LGW-2R proposals, we do expect GAL to make proportionate contributions given the significant expansion of the airport that is proposed.

#### *Effects on Property Values*

12.27 Although PINS suggested that the effect of the NRP on property values should be scoped in, GAL has proposed to scope this out from the assessment. GAL states that there will be little change in flight paths, however, there will be an increase in the frequencies of flights along existing flight paths (cited as 10-15 ATMs per hour) so undoubtedly some properties will experience greater overflight which does have the potential to adversely impact property values. There is also uncertainty as a result of the FASI South programme, which was another issue that PINS advised that should remain in scope. The Council therefore considers that the effect on property values should remain in scope as advised by PINS.

#### *Requirement for construction workers and impacts on housing*

12.28 The Council is concerned for the impacts of the temporary workforce on housing demand and delivery GAL states that there will be an increased demand for construction workers during the Project. This means that there is potential for construction workers to be displaced from construction of housing schemes, which may impact on the delivery of housing (paragraph 16.9.9), which also has the effect of potentially increasing the cost of labour. In addition, the evidence indicates h (16.9.10) describes that a proportion will be drawn from a significant distance from the site and will therefore need local accommodation or working days (or long daily commute). The temporary workforce creates a need for short term / temporary accommodation and there is no mitigation plan to provide accommodation for the temporary workforce. Paragraph 16.9.24 dismisses impacts as negligible on the population but it does not consider the localised nature of growth. Temporary workers will use existing private rented sector housing and short-term housing supply (short term lets, budget hotels etc). **Without a proper mitigation plan, this has unwelcome impacts on the existing housing market as it reduces availability of housing for existing residents, increases the cost of rents and**

**reduces affordability, as well as potentially slowing the rate at which new homes can come forward. It is crucial more detailed work is undertaken to better understand and where necessary mitigate impacts.**

### **Land West of Ifield**

12.29 The Council is concerned at the lack of consistency in the approach to the site Land West of Ifield across the assessments detailed in the PEIR chapters. West of Ifield is a site being promoted by Homes England for inclusion in the emerging Horsham District Local Plan providing circa 3,250 homes plus a range of facilities and community infrastructure. Homes England indicate that the site could form the first of three new neighbourhoods to the west of Crawley which could ultimately deliver some 10,000 homes. The site is a strategic priority for Homes England and was identified in its Strategic Plan 2018/19 – 2022/23. Whilst the progression of the Horsham District Local Plan has not reached Regulation 19 and is temporarily paused due to revisions to the NPPF and the Position Statement<sup>26</sup> issued by Natural England on the Sussex North Water Resource Zone (discussed in more detail in Section 12.0 of this response), the site forms a proposed allocation in the proposed regulation 19 version of the plan discussed at the Cabinet Meeting on 15 July 2021.

12.30 GAL claims that the NRP will have no effect on increasing the number of homes which are required to be built in the Gatwick labour catchment area above those already planned by Local Authorities and cites a practical example being the West of Ifield site in its Standard Overview Briefing available on the NRP Consultation website which is a presentation that has been shared with numerous stakeholders, such as local authorities, parish councils and other interested organisations. In this presentation GAL suggests that Phase 1 of the West of Ifield site could provide 3,250 homes in broadly the same timescales as the NRP to 2038 and also suggests that local infrastructure will grow in line with housing provision including the provision of local health services.

12.31 Conversely, the approach to the assessment of the surface access and transport impacts undertaken to support PEIR Chapter 12 considers that the West of Ifield site is “Reasonably Foreseeable” (as detailed in Appendix 12.9.1 - PTAR Addendum: Uncertainty Log published on 1 November 2021). As this site has been assigned as “Reasonably Foreseeable”, this means that it has not been included in the core scenario for the transport modelling, rather suggesting that some additional sensitivity testing will be undertaken. This approach has also been taken for other significant developments in neighbouring authorities – Horley Business Park and Gatwick Green. Similarly, GAL has chosen to include significant transport improvements that have not yet been consented, such as the Lower Thames Crossing.

**12.32 The Council considers this approach to be inconsistent and insufficient because GAL is choosing to adapt the assessment inputs to suit desired outcomes. It is imperative that GAL clearly sets out a robust approach to all assessment that demonstrates consistency across PEIR topics and includes scenario testing where**

---

<sup>26</sup> [Natural England’s Position Statement for Applications within the Sussex North Water Supply Zone, September 2021 – Interim Approach](#)



there is any uncertainty regarding the delivery of sites or other transport improvements.

### **Economic Development and Employment**

#### *Type and quality of jobs*

12.33 As the consultation documentation material is presented currently, there is a lack of information regarding the type and quality of jobs that GAL consider will be created by the NRP. The number of 'jobs' created by the development needs to have further context on the length of employment and whether the definition of an additional 'job' could be related to employment for just a very short period.

12.34 A key concern is also the type of job on offer. There is the potential that the development could provide opportunities for those seeking employment opportunities, particularly following the impact of COVID on the numbers of those claiming JSA. **However, the type of job on offer appears to be largely of low-quality, with fewer opportunities provided at the higher end. This is considered as a concern, as there has historically been a shortage of higher end jobs in some local areas such as Crawley and does not help deliver wider recover from the pandemic.**

#### *Labour supply and assumptions around Brexit and recovery from COVID-19*

12.35 Whilst employment creation is regularly referred to as a benefit of the development, there is a concern that there could be a shortage of labour within the local area because of the development. The Council is concerned about the level of employment requirements and whether this would draw away vital labour support from the local area to this development. Potentially this could act as a negative for the local economy, as local needs from businesses to progress projects that require local labour could prove harder to meet. In turn, local economic growth could potentially be stunted in this area. Overall, we would be concerned about whether the development would take jobs away from businesses or make it more difficult for businesses in Horsham District.

12.36 There is also concern that GAL has assumed that the worst impacts from the COVID pandemic will principally be felt in 2021 and 2022 (along with assumptions on the effects of Brexit), however, this may not be the case and there should be some alternative scenario-testing based on the potential for these impacts deepening or being experienced over a longer period of time. **We would therefore be concerned about the impact on the local labour market and competition within the local area. GAL is requested to undertake baseline research on low-quality labour supply and the level of competition within the local area and how proposals can best contribute to the local economy and pandemic recovery.**

#### *Long term economic development*

12.37 Considering the significance of climate change and future uncertainties, a reliance on jobs linked to the airport could prove unsustainable in the long-term when we could be concentrating on facilitating green jobs. It is also unclear how a 'job' is qualified to be counted under the employment statistics and whether this covers employment opportunities that only cover a very short period. The Council considers that the number of 'jobs' created by the development needs to have further context on the length of employment and provide

clarification of whether the definition of an additional 'job' could be related to employment for just a very short period.

*Data on off-airport businesses and airport generated trade in Horsham District*

12.38 There are no statistics available on how many Gatwick focused businesses/jobs currently operate in Horsham District rendering any projection of development impact unfeasible. Baseline data on numbers of these businesses and jobs would be helpful.

12.39 **There is also no baseline data available on how many other businesses in Horsham District have trade related to Gatwick's operations and which therefore could be expected to see an uplift as a result of airport expansion. Baseline data on the amount of trade generated by Gatwick Airport for other businesses in Horsham District would also be helpful.**

*Working with local businesses*

12.40 There is the potential that the development could produce additional business opportunities for local businesses. Working with local businesses is considered important for the local economy, for example Horsham District Council have developed a 'Buy Local' initiative. GAL is requested to confirm if it is developing a 'Buy Local' initiative itself and / or encouraging tenant partners / companies to do so too.

*Inbound tourism benefits*

12.41 To assess whether the NRP would provide any additional local economic benefits, we would need to see *how many* overnight stays this would generate within the local area of Gatwick Airport and *how quickly* this would materialise before assessing whether this would bring any economic benefits to the local area.

12.42 **We would also suggest that there should be engagement between local authorities and GAL to promote local areas as visitor destinations, to really see any local benefits.** There does appear to be a 'Gateway Gatwick' initiative which suggests collaboration between Gatwick Airport and partners, including Experience West Sussex for example. Whether there would be any additional efforts to work with partners and engage with local authorities considering this proposal, however, is less clear.

*Increased ground traffic and the associated economic impact.*

12.43 **There is concern that the development could lead to difficulties getting to and from Horsham which could have a knock-on effect on local economic activity, particularly as no mitigation is proposed for key routes within Horsham District. The Council considers that an assessment of potential impacts of additional ground traffic on local economies should be undertaken.**

*Lack of development in support of air freight*

12.44 It is our understanding Gatwick Airport suffered disproportionately through COVID-19 compared to many other UK airports partly due to its low profile as a hub for air cargo operations (which expanded greatly elsewhere). This and the reliance on low budget air

carriers – which carry little cargo, and have relatively low spending passengers, diminishes the local economic gain from development.

*Impact on the North Horsham development*

12.45 The Council considers that the proximity of the strategic site allocation Land North of Horsham which has outline planning permission for 2,750 new homes plus supporting infrastructure and 46,450m<sup>2</sup> of commercial space could have an important role to play in supporting the Airport's proposed development as locations for associated business operations, should the Secretary of State consent the DCO. If the development proceeds, the Council would like to see a more aspirational approach taken by GAL to explore the impact opportunity for sites such as Land North of Horsham.

## 13.0 Water Environment

### **Water Supply**

13.1 The South East, including the NRP local study area, is an area of serious water stress and the adopted Horsham District Planning Framework applies the tighter Building Regulations options requirement of 110 litres/person/day for new housing development. Following work on the Water Cycle Study 2020, to support the emerging Horsham and Crawley Local Plans, this standard is proposed to be tightened still further in the emerging Horsham District Local Plan (as detailed in the Cabinet Agenda papers<sup>27</sup> on the Horsham District Local Plan Regulation 19), to 100 litres/person/day and 80 litres/person/day for strategic development (200+ units) and BREEAM Excellent for non-residential development (Strategic Policy 38).

13.2 As part of the Local Plan preparation Process, Natural England has advised the Council that abstraction by Southern Water to supply Sussex North is potentially impacting upon the Arun Valley Special Protection Area/Special Area of Conservation and Ramsar site. Natural England has therefore advised the Council and other affected authorities that Local Plan policies should ensure that developments within this Zone do not add to this impact - in other words that they are "water neutral". Work is therefore ongoing through the emerging Local Plans to establish a Water Neutrality policy position and strategy that will allow development to come forward in the Sussex North Water Supply Zone.

13.3 In September 2021, Natural England issued a Position Statement requiring that current applications for planning permission will have to demonstrate that they do not increase pressure on water resources, i.e., that the development is water neutral through a dual approach of on-site efficiencies and also the offsetting of any remaining water use through measures including the retro-fit of existing buildings. The Sussex North Water Supply Zone covers the majority of Crawley south of the airport, all of Horsham District, and parts of Chichester District and the South Downs National Park. The ability to positively determine residential and commercial developments unless water neutrality can be proven.

---

<sup>27</sup> [\(Public Pack\) Agenda Document for Cabinet, 15/07/2021](#)

- 13.4 Whilst Gatwick Airport is not within the Sussex North Water Supply Zone and is served by Sutton and East Surrey Water (SES Water), it is still situated within an area of serious water stress. Growth through the NRP and the significant increase in water consumption anticipated in the PEIR will increase demand for water resources in the South East, and for SES Water specifically. As such, the NRP may significantly diminish the potential option of bulk transfers of water from SES Water to help address the current supply issues in the Sussex North area.
- 13.5 The Consultation Overview Document, paragraph 8.8.9, states that *“The airport is supplied with potable water by Sutton and East Surrey Water (SESW). In the ‘Gatwick Sub-region’ Water Cycle Study (2020), SESW stated that there was sufficient capacity at their treatment works to meet projected demand. The PEIR includes assessment of projected water demand in future years with the Project and of ongoing consultation with SESW”*.
- 13.6 However, in paragraph 4.6 of this Water Cycle Study, SESW specifically recommended that development associated with Gatwick Airport should *“incorporate grey water recycling and/or rainwater harvesting alongside the incorporation of water-efficient fixtures and fittings (JBA WCS August 2020.)*
- 13.7 In Table 1.4.1 of Appendix 11.9.4, a list of possible water efficiencies is provided, and comments received from GAL are listed. These responses suggest rainwater harvesting is being designed into large extensions and new builds on the airport but appears to question whether grey water recycling is an option for many buildings, suggesting a trial is required. It does suggest this is a particular opportunity for hotel development. It is not clear from Tables 3.3.1, 3.3.2 and 3.3.3 exactly what efficiencies are being incorporated into the new facilities, as much is to be confirmed following further information. The efficiency savings proposed for hotels and offices are welcomed (Table 3.3.4 and 3.3.5) as is the commitment in the Decade of Change, repeated in the Consultation Overview Document: para 3.4.1, of “Reducing the airport’s drinking water consumption by 50% on a per passenger basis by 2030 (compared to 2019)”.
- 13.8 However, it is also not clear whether any retrofitting to existing buildings is taking place to help offset the increased water use created by the NRP. Even if SESW do conclude from their further assessment that their network and supply sources would be able to meet the increase in demand from the NRP, taking into account other development in the area, **the Council considers that all possible water efficiency measures, including maximising efficiencies for new buildings and operations, as well as the retrofitting of existing buildings, should be clearly identified and implemented as part of the NRP, given the serious water stress in the area.**

#### *Flooding and Drainage*

- 13.9 The Council has reviewed the *Preliminary Environmental Information Report - Appendix 11.9.1: Flood Risk Assessment (Parts 1, 2 & 3) September 2021* and we have no major issues with the Drainage Strategy proposed or with the mitigation measures suggested to reduce the risk of flooding.

13.10 Although all the mitigation measures are within the Project Site Boundary, there appears to be no mention of any ‘*Flood Risk Mitigation*’ upstream of the area to offset the cumulative impacts of this Project alongside the potential development at Land West of Ifield. **The Council considers that there needs to be some synergy between the flood mitigation strategies for the West of Ifield site and the Gatwick NRP should both developments proceed. A potential Upper Mole Flood Alleviation Scheme for example could be an option (attenuation basin at Ifield on the River Mole, located south east of project boundary site (RH11 0LD), where the Ifield Brook joins the River Mole).**

13.11 Given that fluvial flooding is the main source of flooding to this Project, the above-mentioned scheme would be a perfect opportunity to support the development.

## 14.0 Ecology and Nature Conservation

### Ecological impact on the area within Horsham District as a neighbouring authority

#### *General*

14.1 We have reviewed the PEIR documents available in particular the EIA Scoping Report Volume 1: Main text and PEIR Chapter 9: Ecology and Nature Conservation. We welcome the robust approach to survey and initial assessment of potential impacts of this NSIP on all the relevant designated sites and protected and Priority habitats & species.

14.2 We note that paragraph 9.2.2 will need updating to include the Environment Act 2021 and any references to EU Directives need to be removed e.g. Paragraph 9.9.68 of the Ecology chapter 6.

14.3 We note that paragraph 4.2.2 of the Airports National Policy Statement (NPS) requires that *“Where a development may **negatively affect** any priority natural habitat type or priority species, any imperative reasons of overriding public interest (IROPI) case would need to be established solely on one or more of the grounds relating to human health, public safety or beneficial consequences of primary importance to the environment.”*

14.4 Although we consider that further assessment still needs to be given to indirect impacts e.g. air quality, appropriate mitigation and compensation measures have been developed to minimise adverse impacts on ecological features. In delivering new schemes, the Government expects applicants to avoid and mitigate environmental impacts in line with the principles set out in the NPPF and the Government’s planning guidance Airports NPS.

14.5 Paragraph 5.96 of the Airports NPS states that:

*“As a general principle, and subject to the specific policies set out below and the Infrastructure Planning (Decisions) Regulations 2010, development should avoid significant harm to biodiversity and geological conservation interests, including through mitigation and consideration of reasonable alternatives. The applicant may also wish to make use of biodiversity offsetting in devising compensation proposals to counteract **any impacts on***



***biodiversity which cannot be avoided or mitigated. Where significant harm cannot be avoided or mitigated, as a last resort appropriate compensation measures should be sought. The development consent order, or any associated planning obligations, will need to make provision for the long-term management of such measures.***

- 14.6 The Airports NPS also requires the NSIP to clearly set out any likely significant effects on designated sites including locally designated sites of ecological or geological conservation importance (paragraph 5.102). If the Project proposals will negatively affect a Priority habitat or species, then the case for IROPI should be set out in detail within the Environmental Statement (ES). However, whilst the Airports NPS only requires mitigation for significant impacts on Priority habitats & species, the LPA and the SoS for Transport also have a duty to conserve these s41 habitats and species. This extends to all impacts, not just significant ones, in order to demonstrate compliance with their legal duty set out in Natural Environment and Rural Communities Act, 2006 and any revisions contained in the new Environment Act 2021. We therefore expect to find adequate compensation measures identified within any IROPI case within the ES for implementation in full.
- 14.7 We welcome the reference in the Ecology chapter paragraph 9.2.5 to NPPF which “*supports a movement from net loss of biodiversity, through an interim stage of no net loss and on to achieving net gains for nature (Airports NPS paragraph 5.85)*” though we note that the reference should be paragraph 5.86.
- 14.8 However, opportunities to enhance parts of the site need to be considered to meet Paragraph 5.90 of the Airports NPS which states that “*The Environmental Impact Assessment should reflect the principles of Biodiversity 2020 and identify how the effects on the natural environment will be influenced by climate change, and how ecological networks and their physical and biological process will be maintained.*”
- 14.9 The Ecology chapter of the Preliminary Environmental Information Report should therefore thoroughly explore all reasonable options to enhance the development for biodiversity including protected and Priority species to support the Airports NPS paragraph 5.91 which states that “*The applicant should show how the project has taken advantage of and maximised opportunities to conserve biodiversity and geological conservation interests.*” and also in response to local conservation priorities to be compliant with Policy 31 of the Horsham District Planning Framework.
- 14.10 In Horsham, there are several Local Wildlife Sites (LWS) nearby – Orltons Copse, Wood near Lower Prestwood Farm and Hyde Hill - and lots of Lowland Mixed Deciduous woodland Priority habitat and some Ancient Woodland (irreplaceable habitat) and Wood Pasture and Parkland Priority habitat as mapped on Magic maps. Designated sites, including LWS which contain features of substantive nature conservation value, are shown as Core sites on the Horsham District draft Nature Recovery Network<sup>28</sup> which should have buffer zones and made bigger, as well as joined up with other habitats including newly created ones to fill in the gaps.

---

<sup>28</sup> [Horsham District Nature Recovery Network](#)

- 14.11 The Horsham District Planning Framework Policy 31 Green Infrastructure and Biodiversity aims to maintain or enhance the existing network of green infrastructure and biodiversity in the district including designated sites – SPAs and SACs, SSSI and NNRs and LNRs and SINCs which are now known as Local Wildlife Sites (LWS), ancient woodland and other irreplaceable habitats. Policy 25 Natural Environment and Landscape Character also seeks to maintain and enhance the existing network of geological sites and biodiversity, including safeguarding existing designated sites and species, ensure no net loss of wider biodiversity and provide net gains in biodiversity where possible. This NSIP should therefore aim for net gain for biodiversity, which may require offsite compensation to meet the habitat condition identified at scoping stage.
- 14.12 Opportunities to protect and enhance biodiversity need to be tailored to those interests affected by the Project and those of relevance within the locality, ensuring compensation on and offsite is retained within the District.
- 14.13 **We would therefore welcome the opportunity for a Project biodiversity topic group to work closely with any landscape and other topic groups to ensure that environmental impacts during construction will be minimised and that compensatory measures are developed in an integrated manner to deliver multiple benefits.**

#### *Methodology*

- 14.14 The surveys undertaken and assessment of impacts on protected and Priority species appears to be robust and in line with best practice with mitigation and compensation measures embedded into the project design which is welcomed.
- 14.15 Appropriate procedures will need to be incorporated into a Construction Environmental Management Plan (CEMP) as part of the Code of Construction Practice (CoCP) and a long Landscape & Ecology Management Plan (LEMP) for any offsite habitat created or being restored as part of the DCO Requirements. We look forward to the opportunity to comment on the Interim draft documents when are produced.

#### *Bats*

- 14.16 We note that some woodlands were not surveyed for all of the bat trapping and radio tracking surveys e.g. Orltons Copse LWS despite it having the highest number of average bats caught per night. We appreciate that this did not contain of the target species e.g. Barbastelle or Bechstein's. We note that paragraph 5.2.16 and 5.2.17 of Appendix 9.6.3 states that *"However, the areas in the wider landscape are considered to be of County/Regional importance for Barbastelle and be of Regional/National Importance for Bechstein's."* We are therefore concerned that the ES Ecology chapter 6 may have underestimated predicted long term impacts on the wider bat assemblage which could be affected where woodland in Horsham District form part of their Sustenance Zone.
- 14.17 We note that Appendix. 9.9.1 HRA states that *"The landscape-scale study completed in 2020/21 confirmed the presence of a number of maternity colonies (of Bechstein's bats) in blocks of ancient woodland within 5 km of Gatwick, particularly to the west (Glover's Wood*

*and Ifield Wood)*". Paragraph 4.29 of this Appendix continues "*Therefore, the radio tracking data show that bats using the airport are associated with these colonies rather than those present within the surrounding SACs*". Although these will not be part of the bat populations in The Mens SAC and Ebernoe Common SAC which are designated for these bats Appendix II species), likely impacts although not considered to result in a likely significant effect on the SAC populations, do not appear to have been highlighted in the ES Ecology chapter 9.

14.18 It is recommended that bat activity data is added to the assessment of any Important Hedgerows in line with other NSIPs e.g. Any passes of Barbastelle (Appendix II species) or more than 100 passes of other species of bat. Analysis of any crossing points survey results from static bat detectors will need to consider this species in particular.

14.19 There will be a need to cross reference all lighting design requirements with landscape/ecology sections of the Environmental Statement and embed these in the LEMP.

#### *Priority habitats and species*

14.20 It is recommended that the term notable is avoided when referring to Priority Habitats and Species as this has a specific definition relating to IUCN rarity rating e.g. presence of species in a set number of 1km squares nationally which is not relevant to habitats. However, it is welcomed that this information will allow the Secretary of State for Transport to demonstrate they have discharged their biodiversity duty under the NERC Act 2006.

#### *Mitigation and compensation*

14.21 The above issues require additional consideration to avoid them being included in the LIR and to allow the Secretary of State to demonstrate they have met their s40 biodiversity duty. The Council would be keen to see clarification in the Environmental Statement produced relating to Priority s41 Species, which are likely to be present and affected by the development.

#### *Opportunities*

14.22 **There is no detail of any biodiversity enhancements from this Project. This should use Defra Metric v3.0 to ensure compensation is sufficient and that Biodiversity Net Gain (BNG) can be delivered for this NSIP. The Environment Act 2021 places a 10% Biodiversity Net Gain requirement on development unless exempt which extends to nationally significant infrastructure projects which will become mandatory by autumn 2023.** It would be helpful for GAL to clarify what it considers is compensation and what if any net biodiversity or environmental net gain will be included in the Gatwick Northern Runway project.

14.23 There will be opportunities to enhance parts of the site, in particular by creating Priority Habitats and welcome the creation of new hedgerows which need to improve connectivity across the landscape particularly to mitigate for disconnections caused by the Project. The Ecology chapter of the ES should thoroughly explore all reasonable options to enhance the development for biodiversity including protected and Priority species.

- 14.24 **Opportunities to deliver enhancements need to be explored in consultation with appropriate stakeholders as a mechanism to deliver net gain for biodiversity.** This is in line with paragraph 5.33 of the National Policy Statement for National Networks<sup>29</sup> and reasonable opportunities to deliver environmental benefits as part of schemes are required under Schedule 4 of the Infrastructure Planning (Environmental Impact Assessment) Regulations 2009.

## 15.0 Other PEIR Topics

### Historic Environment

- 15.1 Noise is likely to be the largest impact on the historic environment in Horsham District. A steady stream of aircraft at lower levels following principal flight paths may have a visual impact within the setting of heritage assets. Understanding any increased usage of the WIZAD route and the implications of FASI South alongside the Northern Runway proposals and associated flight path information will be important to the Council in respect of impact to the setting of heritage assets in the District. The Council is therefore seeking clarity from GAL regarding any intentions to bring the WIZAD route into more routine use and we reserve the right to make further comments on this issue as appropriate.
- 15.2 We have no comments to make on any archaeological impacts of the proposals at this stage.

### Geology and Ground Conditions

- 15.3 Given that no development is proposed within the administrative boundary of Horsham District, the Council does not wish to make any specific comments at this stage on the PEIR chapter on Geology and Ground Conditions.

### Health and Wellbeing

- 15.4 The Council notes the findings in Chapter 17 on Health and Wellbeing. We do have specific concerns regarding Air Quality and Noise impacts on the health and wellbeing of communities affected by the proposals which we have raised in Section 10.0 of this response and in Appendices (iv) and (v) in the AECOM reports on Noise and Air Quality.
- 15.5 As highlighted in the York Aviation report in Appendix (iii) of this response, there is concern regarding the Baseline Case, the sensitivity analysis for different growth trajectories, the methodology for forecasting, which has not been set out, and the resulting doubt around the forecasting and assessment. Given these fundamental concerns around the assessment, this may have implications for the conclusions drawn on the health and wellbeing impacts. The Council therefore has no further comments to make at this stage, but we will continue to review and reserve the right to make additional comments as appropriate or on any updated assessments that become available.

---

<sup>29</sup> [National Policy Statement for National Networks \(December 2014\), Department for Transport](#)

- 15.6 The Council also supports and endorses the comments made by West Sussex County Council on Health and Wellbeing matters, given its County level responsibility for public health.

### **Waste**

- 15.7 Paragraph 5.2.38 of PEIR Chapter 5 states that “a replacement CARE facility is proposed in the north western part of the airport and the relocated CARE facility would process the majority of airport waste”. The Council notes that the final location of the CARE (Central Area Recycling Enclosure) facility has not been determined and is presented as two different options. The facility is of a significant scale, likely constituting EIA development alone, with the proposed CARE building up to 22 metres in height above ground level and a biomass boiler flue up to 50m above ground level, all occupying an area of 17,550m<sup>2</sup>. Given the uncertainty around its final location, this leads to uncertainty around the impacts as the two different options can lead to different or unexpected outcomes which makes it difficult for stakeholders to properly assess.
- 15.8 The Council has had regard to the consideration of the preferred options for the Waste Management facilities, set out in paragraphs 3.3.122 – 3.3.128. The Council considers that the scale of this facility and its operations require important information to be provided including justification for the chosen site location, details of the technologies to be used in the facility and a detailed assessment of the environmental impacts of the facilities.
- 15.9 The Council would also like to request clarity regarding the treatment of waste. It is noted that the CARE facility would process the “majority” of the airport’s waste. GAL is requested to share how much will be processed on site and how much off-site and to provide details of where will the waste that is not processed on site be transported? The Council wishes to understand if there will be any residual impacts on the District given the location of the new Britaniacrest Recycling, Recovery and Renewable Energy Facility (3Rs) that was granted consent by planning appeal in February 2020.

### **Major Accidents and Disasters**

- 15.10 In the Council’s response to PINS on the EIA Scoping Report in 2019, we stated that we do not believe it is appropriate to scope out a number of Major Accident and Disaster scenarios including, but not limited to, transport accidents, malicious attacks, drones/laser incidents and terrorism. It is noted that in the Planning Inspectorate’s Scoping Opinion it was advised that certain matters such as terrorism or malicious attacks should remain in scope and include details of the current systems in place to address impacts for these matters and describe any changes required to take place for the proposed development.
- 15.11 **GAL has proposed to scope out such issues and describes that there are extensive mitigation and contingency measures in place but they are confidential and cannot be detailed in the EIA.**
- 15.12 **Whilst the Council acknowledges the requirement for confidentiality in such sensitive matters, concern remains that the scale of expansion and associated increase in**



traffic around the airport means that disruption at the airport can lead to significant disruption on the wider transport network and these impacts and any required mitigation need to be understood. New development may also be impacted by the potential incidents outlined.

#### **Agricultural Land Use and Recreation**

15.13 No comments at this stage.

## **16.0 Cumulative Effects Assessment**

### **Consideration of Strategic Sites in Horsham District**

16.1 The Council has had regard to the Cumulative Effects Assessment (CEA) and the CEA methodology that has been undertaken to consider the cumulative effects of other development in combination with the NRP. The Council has concerns in relation to how the development sites within the District have been considered as part of this assessment. The below comments are based on each of the sites within the District that have been considered for PEIR Chapter 19: Cumulative Effects and Inter-relationships.

#### ***Land West of Ifield (Reference 328, Figure 19.4.2)***

16.2 The Council has had regard to the development that has been included in the CEA and the tiered approach to assessing each type of development (proposed, allocated or under construction). Tier 1 developments are those defined as either “*under construction*” “*permitted application(s) but not yet implemented*” or “*submitted application(s) but not yet determined*”. Land West of Ifield is a site put forward to the Council by Homes England as a potential allocation in the emerging Horsham District Local Plan. The Council conducted consultation on the emerging Local Plan in early 2020 (Regulation 18) but, at the time of writing this response, has not made any formal decision on the Local Plan nor which sites are proposed for allocation (Regulation 19), nor has a planning application been submitted on the site. It is further noted that on p.14 in Table 19.4.5 refers to West of Ifield as an ‘allocated site’ which is incorrect. A scoping opinion has been provided on the site by the Council, however, Land West of Ifield cannot be described as a Tier 1 development at this stage, but rather a Tier 2 or more likely Tier 3 development (Tier 2 as there is a scoping opinion, but no application has been submitted yet and Tier 3 as it has been identified as a site with potential for allocation in the Regulation 18).

16.3 Nevertheless, the Council considers it is important that reference to the progression of the site as part of the Council’s emerging Local Plan is accurately reflected.

#### ***West of Bewbush Joint Area Action Plan (Kilnwood Vale) (Refs. 73 and 149, Appendix 19.4.2)***

16.4 Reference 149 refers to an area of land to the west of Crawley which is a strategic site allocation known as the West of Bewbush Joint Area Action Plan (JAAP) (2009) for approximately 2,500 homes and other uses, including employment provision. This site is now more commonly known as Kilnwood Vale and development of the site is underway.

Reference 73 refers to a smaller parcel of land that sits within the wider Kilnwood Vale site that was originally 'Reserve Land', safeguarded for a period of five years under the outline application and JAAP for a potential route to accommodate the Crawley Western Link Road. Following the lapse of this five-year period, DC/17/2481 granted outline planning permission for approximately 227 dwellings with the construction of a new access from Calvert Link, a pumping station and associated amenity space.

- 16.5 It is noted that on p.14 within Table 19.4.5 that the Kilnwood Vale site is "*to be constructed in phases of which most are built out*". This is incorrect. Phase 1 is complete, and Phase 2 is mostly complete. Some early parts of Phase 3 have been completed; however the majority of Phase 3 hasn't started as land remediation is being undertaken. No works or Reserved Matters applications have been submitted for Phases 4 or 5 yet. It is therefore incorrect to say that the phases are mostly built out as there is still considerable development that has yet to take place.

*Omission of Land West of Kilnwood Vale*

- 16.6 GAL has identified Land West of Ifield as a site to be considered in the Long List as the Council has identified it as a site with potential for allocation in the Council's draft Horsham District Local Plan in its Regulation 18. Land West of Kilnwood Vale is also a site that has been identified by the Council as having potential for allocation in the Horsham District Local Plan. In the regulation 18 Consultation it was identified as a strategic scale site for 800 units to the west of the existing Kilnwood Vale strategic site. The current site under consideration is smaller than originally proposed on an area of land to the south of the railway line. However, the additional area would still meet the criteria for inclusion in the Long List set out in Table 19.4.3 as it is a proposal for 350 additional units sited within the 8km search radius. The Council therefore considers that this site should be included in the Long List as part of the Cumulative Effects Assessment (map of the site attached in Appendix (i) for ease of reference).

*Land South of Newhouse Farm (Reference 334, Appendix 19.4.2)*

- 16.7 Reference 334 on Figure 19.4.2 refers to a planning application that was submitted to the Council on Land South of Newhouse Farm. This was an outline application for the erection of 473 dwellings, with new access provided off the Crawley Road, with associated areas of open space and landscaping (planning application reference DC/20/0470). The Application Number and the Description on p.15 of Table 19.4.5 referring to this site (Reference Number 334) are both incorrect as the details do not relate to this site. It should also be noted that this application was refused by the Council and dismissed by the Planning Inspectorate at appeal. A recent High Court Challenge recently upheld the appeal inspector's decision to refuse the application. This site should therefore be excluded from any assessment of cumulative effects.

*Omission of the Strategic Site Allocation Land North of Horsham*

- 16.8 Land North of Horsham is a strategic site allocation in the Council's current local plan, the Horsham District Planning Framework (HDPF). The site has outline planning permission granted under DC/16/1677 with all matters reserved except access for a mixed-use strategic

development to include housing (up to 2,750 dwellings), business park (up to 46,450 m<sup>2</sup>), retail, community centre, leisure facilities, education facilities, public open space, landscaping and related infrastructure.

16.9 We note from the Search Criteria for Developments to be included in the Long List (Table 19.4.3) that Major Applications delivering upwards of 200 units should be included within an 8km radius. The Council also notes from Appendix 19.4.1: Cumulative Effects Assessment Long and Short List that GAL considered the site to be 9.8km distance from the NRP and has therefore been excluded the site from the assessment. The Council does not agree with GAL's assessment of the proximity of the site from the Project.

16.10 The boundary of the site Land North of Horsham lies approximately 7.45km to the south west of the airport boundary as can be seen in the map screenshot below.



Figure 4: Distance of the Strategic Site Land North of Horsham from Gatwick Airport

Source: HDC

16.11 The consultation documentation does not make it clear how the distance of this site has been measured from the Project, however, the Council considers that this site should be



included in the assessment. The site meets the search criteria and given the scale of the development and the timescales for delivery of this significant strategic site which will run concurrently alongside the proposed timescales for growth of the airport, cumulative impacts for this site and the NRP should undoubtedly be incorporated into the assessment and carefully considered. A map of the strategic site Land North of Horsham is attached in Appendix (ii) for ease of reference.

- 16.12 **Given the omissions and errors that have been identified above on the strategic-scale development sites in Horsham District and within the search radius, it is imperative that the cumulative effects are re-assessed based on the updated information provided by the Council.**
- 16.13 **The Council also requests further justification for limiting the search radius to 8km from the Project. As we highlighted in our response to the Scoping Report 8km is not considered wide enough, particularly given the significant strategic-scale development that is likely to come forward as part of the emerging Horsham District Local Plan and the close economic relationship of Horsham within the wider Gatwick Diamond and the airport as an entity.** As we have already highlighted above, we are very concerned that Land North of Horsham was not included in the Cumulative Effects Assessment. We note from Appendix 19.4.1: Cumulative Effects Assessment Long and Short List that certain developments of scale (such as Land North of Horsham) have been excluded from the PEIR shortlist, however, no justification for exclusion has been provided. Justification for the 8km search radius should be provided in the ES.

### **Cumulative Effects Assessment across PEIR Topics**

#### *Cumulative Effects of Traffic and Transport Considerations*

- 16.14 The surface access and transport effects throughout the NRP, from the initial construction phase, through to the Design Year of 2038 have been determined as no significant effects considered likely and therefore it has been concluded that no additional cumulative assessment is required. There is concern that the potential for cumulative impacts on the local road network in Horsham District has not been fully considered, given the errors identified above and the Council considers that further cumulative assessment should be undertaken. This is particularly important given that the significant strategic-scale site Land North of Horsham that has been excluded from the assessment by GAL, which the Council believes is incorrect. The Council has particular concerns regarding the impact on the A264 and surrounding routes as a result of the NRP in combination with development at Kilnwood Vale, Land North of Horsham and the potential for further development West of Ifield and West of Kilnwood Vale, should the sites be allocated in the emerging HDLP.

#### *Cumulative Effects of the Socio-Economic Considerations*

- 16.15 It has been concluded by GAL that “*the cumulative effect on construction employment is not anticipated to change*” and “*therefore no further cumulative effects are considered likely*”. The Council is concerned that the impact on construction employment has not been fully considered and further work is necessary to understand the construction employment

requirements of the NRP, along with the other Tiers 1, 2 and 3 development identified by GAL. The strategic-scale sites in Horsham District alone are significant (particularly as the strategic-scale site Land North of Horsham has been omitted but should be included). Given the in-combination effects of the NRP and the other developments identified, the scale is such that the build out of this development has the potential to impact the availability of construction labour in the local area.

#### *Cumulative Effects of Health and Wellbeing Considerations*

16.16 The Summary of the Cumulative Effects Assessment contained within Table 19.8.1 on p.26 under Health and Wellbeing states that *“The Heathrow expansion project would increase aircraft noise over a wide area including in the area between the two airports. At PEIR stage, the design of the airspace required to facilitate a third runway at Heathrow is not sufficiently developed [to] allow for a cumulative noise assessment and as such no health and wellbeing assessment is possible.”*

16.17 The Council is concerned that there is a disconnect between the expansion proposed at both Gatwick and Heathrow Airports and the potential implications of airspace change that will take place as a result of FASI South. GAL has concluded that cumulative noise assessment cannot take place for the health and wellbeing impacts, however, the Council considers that this approach is insufficient.

#### *The Water Environment*

16.18 Table 19.9.2 details the PEIR Topics Scoping Summary for Inter-related Effects Assessment. The Water Environment has been scoped out of the NRP lifetime and receptor-led assessments as it is explained that *“the potential impacts on the water environment are assessed in Chapter 11: Water Environment, no further inter-related effects are considered likely.”*

16.19 As already highlighted, on 14 September 2021 Natural England issued a Position Statement to Horsham District, Chichester District and Crawley Borough Councils containing interim advice for planning applications within the Sussex North Water Supply Zone. It is acknowledged that Gatwick Airport is not supplied from this Water Supply Zone, however, it is considered that the cumulative effects of issues in the Sussex North Water Supply Zone should remain in scope and continue to be assessed. Whilst discussions between the affected local authorities, Natural England, Southern Water and the Environment Agency are ongoing and, at the time of writing, this issue is yet to be resolved, it is imperative that GAL continues to monitor this significant issue.

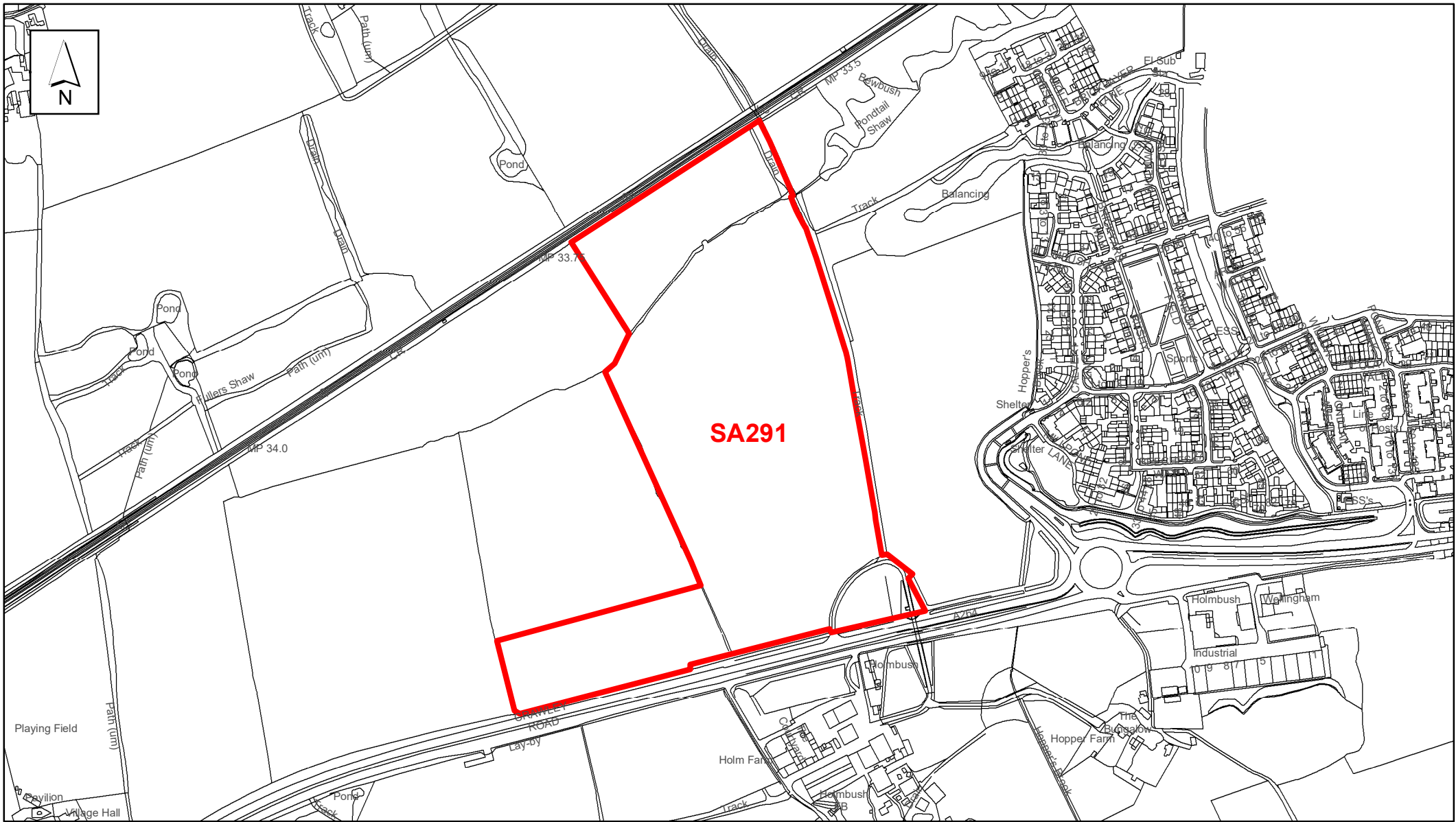


## 17.0 Appendices

- Appendix (i): Map of Land West of Kilnwood Vale
- Appendix (ii): Map of Land North of Horsham
- Appendix (iii): Consultation Review for the Host and Neighbouring Authorities, prepared by York Aviation
- Appendix (iv): Noise Response Report, prepared by AECOM
- Appendix (v): Air Quality Report, prepared by AECOM
- Appendix (vi): Socio-Economics Response Report, prepared by AECOM
- Appendix (vii): Traffic and Transport Response Report, prepared by AECOM
- Appendix (viii): Carbon and Climate Change Response Report, prepared by AECOM
- Appendix (ix): Review of the Statutory Consultation, prepared by AECOM

# **Appendix (i)**

## **Map of Land West of Kilnwood Vale**



## Horsham District Council

Parkside, Chart Way, Horsham  
West Sussex RH12 1RL.  
Barbara Childs : Director of Place

Reproduced by permission of Ordnance Survey map on behalf  
of HMSO. © Crown copyright and database rights (2021).  
Ordnance Survey Licence.100023865

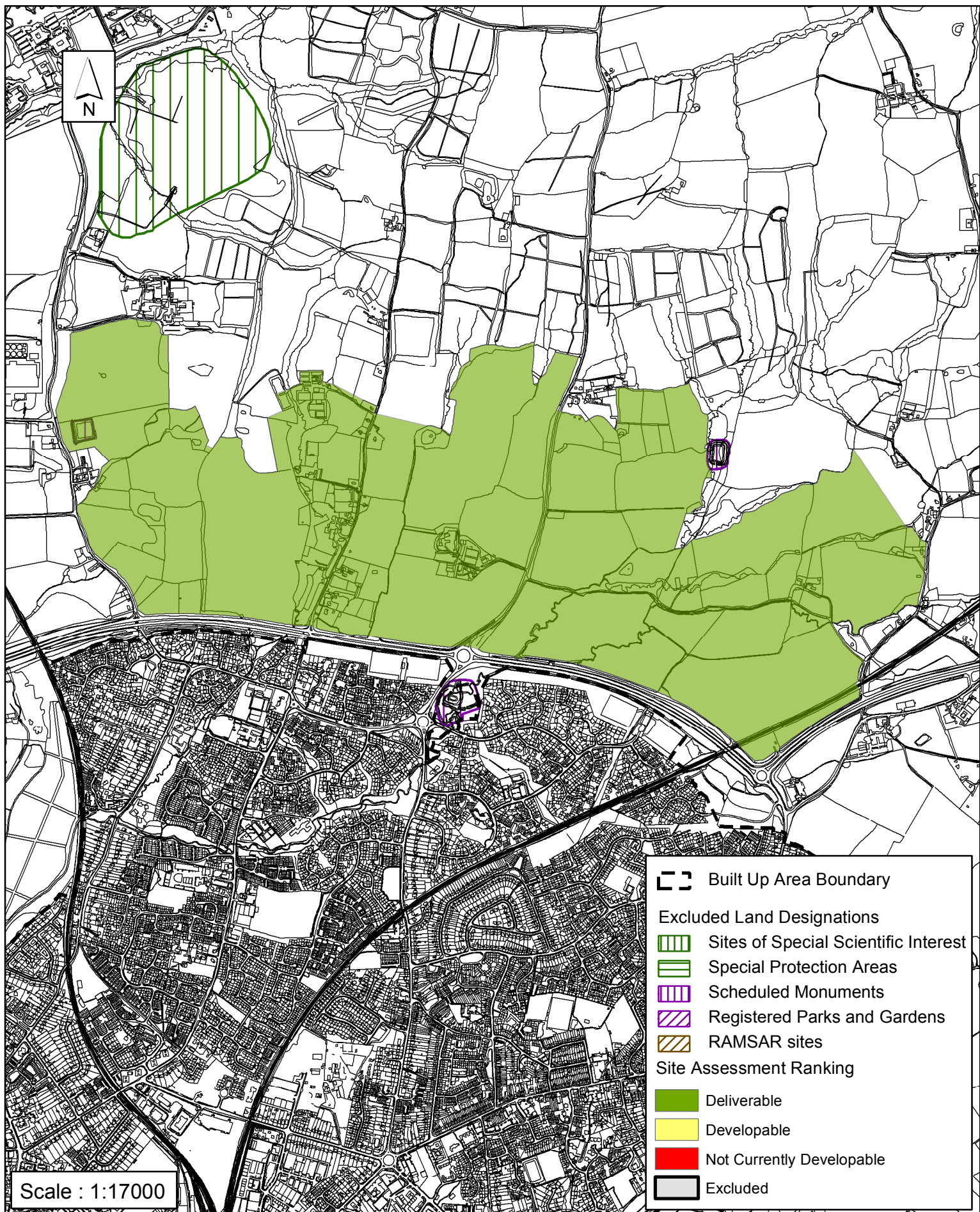
## Local Plan Review 2021 Colgate

Reference No :		Date : 17/03/2021	Scale : 1:6,000 at A4
Drawing No :	Drawn :	Checked :	Revisions :

# **Appendix (ii)**

## **Map of Land North of Horsham**

# SA - 296: Land North of Horsham, Strategic Site, Holbrook Park and Chennells Brook, North Horsham



Reproduced by permission of Ordnance Survey map on behalf of HMSO. © Crown copyright and database rights (2018).  
Ordnance Survey Licence.100023865

Date:

Revision:

## Horsham District Council

Parkside, Chart Way, Horsham  
West Sussex RH12 1RL.  
Barbara Childs : Director of Place