

20 NOVEMBER 2025

Horsham District Council
Planning Department
Albery House
Springfield Road
Horsham
West Sussex
RH12 2GB

By email to - planning@horsham.gov.uk

Dear Mr Hawkes,

**Representations by Gatwick Airport Limited to Hybrid Planning
Application reference DC/25/1312 - Land West of Ifield, Charlwood
Road, Ifield, West Sussex
Planning Application by The Housing and Communities Agency trading
as Homes England**

Gatwick Airport Limited (GAL) object to the hybrid planning application by the Housing and Communities Agency (HCA) for a phased, mixed-use development on the site known as 'Land West of Ifield' comprising:

- a) Full planning permission for enabling infrastructure including the Crawley Western Multi-Modal Corridor (Phase 1); access infrastructure to enable servicing and delivery of secondary school site and future development, including access to Rusper Road, supported by associated infrastructure, utilities and works; and
- b) Outline planning permission (with all matters reserved) for up to 3,000 residential homes (Class C2 and C3), commercial, business and service (Class E), general industrial (Class B2), storage or distribution (Class B8), hotel (Class C1), community and education facilities (Use Classes F1 and F2), gypsy and traveller pitches (sui generis), public open space with sports pitches, recreation, play and ancillary facilities, landscaping, water abstraction boreholes and associated infrastructure, utilities and works, including pedestrian and cycle routes and enabling demolition.

GAL's grounds of objection relate to aerodrome safeguarding, noise, water and surface access. This letter contains GAL's initial comments on the proposed development. GAL notes the complexity of the submission and understands that with a scheme of this scale, there is likely to be additional information submitted during the course of the application's determination which

may warrant further response. GAL therefore reserves its right to respond further up until final determination of the application.

GAL recognises that the HCA planning application was submitted before its Development Consent Order (DCO) for the Northern Runway Project (NRP) was consented on 21st September 2025. These representations consider the potential impacts arising from the HCA's proposals on our existing operations; the future implementation of the now consented Northern Runway DCO, and an additional runway to the south of the airport. This approach is consistent with GAL's Masterplan published in 2019.

GAL's submission to the consultation on the Regulation 19 version of the Horsham District Local Plan 2023-2040 confirmed that there is no objection to the principle of allocating land to the West of Ifield for the development envisaged in Strategic Policy HA2, but that there was objection to some of the detail of the proposed policy. GAL recommended that greater certainty was needed to ensure that housing development would not take place in locations which are unsuitable due to the current and future local noise climate when taking into consideration the planned growth at Gatwick Airport.

For convenience, GAL has grouped its comments on the HCA application under the following sub-headings:

1. Gatwick Airport Safeguarded Land Policy
2. Northern Runway Project
3. Airport Operation Safeguarding
4. Noise Issues
5. Highway Issues
6. Flood Risk and Water Matters

1. Gatwick Airport Safeguarded Land Policy

The Government has been consistent with its policy position on safeguarding land at airports for over twenty years, stating that it is prudent to continue with a safeguarding policy to maintain a supply of land for future national requirements and to ensure that inappropriate developments do not hinder sustainable aviation growth.

The [Gatwick Airport Masterplan 2019](#) sets out GAL's intention is to progress the detailed design and development work to make best use of the existing runways whilst continuing to safeguard land for an additional runway to the south of the airport to meet longer term demand growth. An additional wide spaced runway has the potential to take Gatwick's capacity to approximately 95mppa.

The approach to safeguarding land at Gatwick Airport, including for an additional full wide-spaced runway, was recently endorsed by the Planning Inspector appointed by the Secretary of State to examine the Crawley Borough Local Plan 2023-2040, adopted in October 2024. [The Inspector's Report](#) concluded that the over-arching approach to continue safeguarding land that would be critical for an expanded Gatwick Airport was justified and that the proposed extent of the area to be safeguarded in the Plan appropriately reflects this (paragraph 94). Paragraph 96 confirms that the approach to safeguarding is based on robust evidence and is justified, effective and consistent with national planning policy.

GAL has considered the HCA proposals against policies that safeguard land at the airport for future development to enable growth as set out in the Gatwick Airport Masterplan 2019 (including land to be safeguarded for an additional runway to the south of the airport). This is to ensure that the proposals for development will not be incompatible with GAL's proposals to grow the airport.

Whilst the proposals do not physically infringe on land safeguarded for airport growth, it could be incompatible in other ways, for example, when taking into account noise and other environmental considerations, or safeguarding matters associated with the airport's operation. These matters are discussed in other sections of this letter.

2. The Northern Runway Project

On 21 September 2025, the Secretary of State for Transport approved the Gatwick Airport Northern Runway Project Development Consent Order (NRP DCO). The DCO approval will bring the existing northern runway into routine use for departing flights to enable dual runway operations with the existing main runway. The DCO development includes provision of on-site infrastructure to support growth and highways works to upgrade the existing surface access routes to the airport.

It is important to state that the NRP is not a substitute, or replacement for the additional runway to the south of the airport as identified in the Gatwick Airport Masterplan 2019, which has the potential to further increase passenger capacity at the airport. Land continues to be safeguarded to the south of the airport and this must continue to be protected, in accordance with existing policy. The DCO development is located primarily within the existing airport boundary therefore whilst the HCA proposals do not physically infringe on the NRP DCO, consideration is given to whether it could be incompatible in other ways, for example, when taking into account noise and other environmental considerations. These matters are discussed in other sections of this letter.

3. Airport Operation Safeguarding

The proposed development has been examined from an aerodrome safeguarding perspective and has been found to conflict with safeguarding criteria. Planning permission should therefore not be granted for the application in its current form.

GAL maintains an objection to the application proposals unless the following matters can be secured through changes to the planning application and through the imposition of recommended conditions as set out in **Appendix 1** of this letter.

Where the Council proposes to grant permission against the advice of GAL, or should it not choose to attach conditions which GAL has advised, it shall notify GAL and the Civil Aviation Authority as specified in the Town & Country Planning (Safeguarded Aerodromes, Technical Sites and Military Explosive Storage Areas) Direction 2002.

Two key areas of concern from an aerodrome safeguarding perspective relate to 1) the proposed building heights within the development; and 2) proposed species mix and density of planting in certain areas.

Building Heights Parameter

Drawing no. WOI-HPA-PLAN-PP04-01 - Parameter Plan 4: Building Heights indicates that there could be buildings up to 6m above existing site levels in the green hatched area, as shown on the diagram below.



The Applicant has advised in recent email correspondence that "*the area to the north of the green line is designated for natural and semi-natural greenspace only, and the parameter plans (via the clarification notes on the Building Height and Landscape and Public Realm plan will form a control on future RMAs and read together) only allows for ancillary buildings where they may be required to serve the areas of landscape and the scheme, such as isolated utility buildings as part of the water neutrality strategy. It is not envisaged that there would be any substantial building or changes to ground levels in this area between the development and the runway.*

This area is part of the outline element of the planning application, and any development (landscaping or built) in this location would be subject to a subsequent RMA where likely compliance with the below would be achieved, particularly given the small area of land involved."

Locating buildings in the green hatched area would still give rise to infringement of the Take Off Climb Surfaces (TOCS) for the proposed additional runway to the south of the airport which continues to be safeguarded. GAL therefore requests that the parameter plan (Drawing no. WOI-HPA-PLAN-PP04-01 - Parameter Plan 4: Building Heights) is amended to show no new built development in the green hatched area. In addition, the suggested building height condition at Appendix 1 should be attached to the grant of any planning permission to ensure aerodrome safeguarding continues to be protected.

Species Mix and Density of Planting

GAL's bird hazard management advisors have recommended that no more than 30% fruit and berry bearing species should be planted at the northern end of the site closest to the airport. This could increase to 50% at the centre and southern ends of the site. Any berry/fruit bearing species should also be scattered through the planting and not planted in large groups.

Habitats such as neutral grassland meadow or species rich grassland are preferred nearer the airport, but some woodland, scrub and hedgerow planting will be acceptable with the above-mentioned limitations on fruit and berry bearing species.

It is also recommended that any trees planted in the northern part of the site, in particular, have 4m planting centres and we would recommend that thinner, more open, canopied species such as Birch are planted in this area. This will help to prevent large stands of trees that could be suitable for the nesting and roosting of large numbers of birds close to the airport.

Whilst it is acknowledged that the detailed landscaping scheme will be submitted at the reserved matters stage, GAL request the inclusion of the suggested landscaping condition set out in Appendix 1 to ensure that the proposed development is compatible with the safe operations of Gatwick Airport.

4. Noise Issues

Mitchell Environmental Limited has reviewed the planning application on behalf of GAL and in particular, the likely impacts from Gatwick Airport related air noise both currently and in the future given the planned growth at the airport. Three scenarios have been considered:

- i. 2024 baseline
- ii. Northern Runway Project (NRP) peak year (2032 Updated Central Case Fleet)
- iii. Additional runway to the south of the airport

Below is a summary of GAL's observations on the noise assessment reported in the Environmental Statement (ES) submitted with the HCA's application and associated documents. The detailed noise contour maps overlaid on the proposed development for each scenario discussed is provided in Figures 1.1 to 1.7 at **Appendix 2** of this letter.

2024 baseline

Figures 1.1, 1.2 and 1.3 at Appendix 2 show that the housing portion of the proposed development is just outside the Leq 16 hr 51dB LOAEL (Lowest Observable Adverse Effects Level), and the Leq 8 hr night 45dB LOAEL, indicating no significant adverse noise effects in the 2024 baseline. The housing portion of the proposed development is also just outside or just touching the N60 10 contour indicating no more than about 10 aircraft noise events at night above Lmax 60dB, a further supplementary indicator that significant sleep disturbance is unlikely.

It can therefore be concluded that in the 2024 baseline case, the proposed housing would not be significantly impacted by aircraft noise from Gatwick Airport.

Northern Runway Project (NRP) peak year (2032 Updated Central Case Fleet)

Figures 1.4, 1.5 and 1.6 at Appendix 2 provide Leq 16 hr, Leq 8 hr night and N60 night noise contours for the peak year forecast with NRP, i.e. in 2032 with the fleet GAL considers most likely, the Updated Central Case fleet, as published in the NRP Environmental Statement and Development Consent Order.

Figures 1.4, 1.5 and 1.6 also show that the housing portion of the proposed development is just outside the Leq 16 hr 51dB LOAEL and the Leq 8 hr night 45dB LOAEL, indicating no significant adverse noise effects with the NRP. The housing portion of the proposed development is also just outside the N60 10 contour indicating no more than about 10 aircraft noise events at night above Lmax 60dB, a further supplementary indicator that significant sleep disturbance is unlikely.

It can therefore be concluded that in the NRP development case the proposed housing would not be significantly impacted by aircraft noise from Gatwick Airport.

Additional runway to the south of the airport

Chapter 12 of the Environmental Statement assesses air noise impacts associated with the additional runway to the south of the airport ("Additional Southern Runway") because it is safeguarded in national and local planning policy. Paragraph 12.10.86 states "*The assessment is considered worst-case and the likelihood of the second southern runway materialising is deemed to be limited*". GAL strongly disagrees with this statement. Land required for the Additional Southern Runway is safeguarded and it is our intention, as set out in our Gatwick Airport Masterplan 2019, to grow the airport to meet longer term demand growth through the introduction of an additional wide-spaced runway. This option therefore needs to be thoroughly and appropriately assessed.

Figure 1.7 at Appendix 2 shows Gatwick Additional Southern Runway (no EATs) Leq 16 hr contours for 2040, as modelled in 2014 for the Gatwick Airport Masterplan 2019. Only values from 54dB upwards in 3dB steps are provided because, in 2019, the LOAEL at 51dB had not been established and this contour is not available. The Leq 8 hr night 48dB contour covers less of the proposed site than Leq 16 hr 54dB, so it is reasonable to focus on the Leq 16 hr 54dB contour for assessing impacts in this context.

For clarity, it should be pointed out that ES Figure 12.4 shows these contours correctly. ES Figure 12.3 shows the 2050 contours that are smaller, i.e. giving lower noise impacts, but the figure is incorrectly titled as 2040. The text in the ES using these figures is however correct.

It is clear from Figure 1.7 at Appendix 2 that all the proposed housing is above LOAEL mostly by between 3 and 9dB indicating noise impacts across all 3,000 houses, and associated schools and other noise sensitive buildings and open space. It is recognised that the Masterplan has moved all proposed 3,000 homes to the south of the development site. Whilst this is seen as a significant mitigation measure, it is not enough to mitigate significant likely effects.

Indeed, there are other areas within the ES where the Applicant concludes that there is insufficient mitigation available to deal with the expected noise effects in areas within the proposed development.

Paragraph 12.11.14 of the ES considers the Gatwick Airport Additional Southern Runway Option 3 (Wide Spaced Mixed Mode) No EATs 2040 Leq 54-72 dB(A) contours and concludes that mitigation measures cannot reasonably be provided to avoid significant effects in all areas of the Proposed Development. This paragraph accepts there are no mitigation measures available to avoid this, for outside areas, e.g. open space, residential gardens and amenity areas.



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The assessment goes on to discuss the benefit of providing other external amenity areas in quieter areas to the south of the site as mitigation where alternate quieter external amenity space can be provided for residents of the proposed development (paragraph 12.11.18 of the ES). The amenity space 'in the south of the site' has no lower noise levels and amenity space to the north has higher noise levels, so the value of this mitigation measure is overstated. Table 12.24 in the ES appears to use this mitigation measure to downgrade effects but this is not supported, or explained. The effects are understated in GAL's opinion.

The ES makes much of the fact that the layout has (or will) avoid housing in areas above Leq 16 hr 60dB which was a requirement of Strategic Policy HA2 (West of Ifield) in the emerging Horsham Local Plan (Regulation 19 version). Part (4) of the policy stated that "*no residential development or other noise sensitive uses are permitted anywhere on the site where it is considered to be exposed to current or potential future aircraft noise levels which is above 60dB Leq 16hr.*"

However, in paragraph 12.10.85 in the ES, it notes that the 2040 noise contours are slightly larger than the 2050 contours so noise levels will be dropping as the latter phases of the scheme are built and housing development after 2040 may comply even if it is within the 2040 contour. This paragraph notes "*The residential development within the last (or any) phase of the Site would be designed to accommodate the prevailing Gatwick Airport noise contours at that time*". However, there is no design that can avoid unacceptable adverse effects in the planning sense other than to not build at all.

The ES discusses internal noise levels in homes and commits to noise insulation to reduce this but provides no details. The design of that noise insulation and, just as importantly, ventilation to allow fresh air and avoid overheating is left until later for the subject of planning conditions. The ES does not show if a Good Acoustic Design (reference Professional Practice Guidance on Planning and Noise – ProPG) has been followed. Whilst in this case the developer can readily design acoustic glazing in detail later, a sustainable building design for ventilating new buildings could require additional space and change building dimensions, appearance, power supplies etc. - so the type of design. Accordingly, GAL consider it essential that the type of design solutions that are to be incorporated to achieve the necessary levels of noise insulation/ventilation should be identified at this stage so that it can be demonstrated that they are effective and sufficient to mitigate the likely effects.

Similarly, whilst there is a commitment to design schools with necessary noise mitigation, no details are provided to demonstrate how that will be achieved. GAL considers these details should be provided at this stage to demonstrate that appropriate internal noise levels together with the necessary ventilation can be achieved.

The cumulative noise assessment (Section 12.13 in the ES) does not appear to address the cumulative effect of aircraft noise and other noise quantitatively. This suggests cumulative noise impacts could be worse than reported.

Gypsy and traveller sites are expected in zones M7 and M8 within the Leq 16 hr 54 to 57dB noise exposure zone. It is noted in the ES that these homes cannot necessarily be designed with adequate sound insulation and ventilation and Table 12.24 in the ES (Summary of Residual Noise and Vibration Effects) concludes that there will be moderate (significant) effects. This area is therefore not an appropriate site for gypsy and traveller sites.

External noise levels will result in significant effects across the housing development which cannot be mitigated by noise insulation and for which no other mitigation has been identified. The Planning Statement does not offer an argument for why, in the planning balance, the benefits of the proposed development should outweigh the noise concerns. This is a new housing development for some 7,500 people, and it should be designed to meet the latest standards to provide new healthy housing for future generations.

The Health Impact Assessment (HIA) identifies at Section 3.1, that the ES scoping opinion from Crawley BC required aircraft noise to be considered. However, the HIA does not address aircraft noise despite the ES concluding moderate significant effects to all proposed 3,000 homes arising from an additional runway to the south of Gatwick Airport. The HIA should quantify the scale of the health impacts of aircraft noise, for example, using the webTAG method to monetise the negative health impacts. Without this, it is not possible to give adequate weight to this negative effect in assessing the overall merit of the scheme.

The proposed development is contrary to national and local planning policy and guidance on aircraft noise and would be better located elsewhere where future aircraft noise levels associated with future growth at the airport are lower. GAL strongly objects to the proposed development on this basis.

5. Highways Issues

GAL notes the response to the application by National Highways dated 24th September 2025 where they request further information from the Applicant regarding the potential for the proposed development to impact on the safe and efficient operation of the Strategic Road Network, in this case, particularly within the vicinity of the M23. GAL would welcome the opportunity to comment on any additional information that is provided by the Applicant.

The note in Appendix 3 to this letter sets out GAL's request for additional information and a response in relation to the following matters:

- i. General comments on the hybrid nature of the application

- ii. Transport Modelling
- iii. Behaviour Change to Sustainable Modes
- iv. Transport Strategy
- v. Travel Plan
- vi. Construction Vehicle Routes
- vii. Crawley Western Multi-Modal Corridor (CWMMC)

GAL is therefore not in a position to provide meaningful comment on the highways issues given the current level of information and does not consider any decision could be taken without significant further information becoming available.

6. Flood Risk and Water Matters

GAL is aware of the objection made by the Environment Agency and their request for additional information. We therefore reserve our right to make further comments when further information becomes available.

We note as stated in the Flood Risk Assessment (FRA) submitted with the application that the Crawley Western Multi-Modal Corridor (CWMMC) includes culverts. Given Gatwick's Northern Runway Project includes measures on the River Mole to improve fish passage it is not clear what consideration has been given to open-span bridge crossings in lieu of culverts to avoid impacting aquatic ecology.

GAL also query whether any consideration has been given to potential changes to the full flow hydrograph from the proposed development for all modelled events at the downstream boundary of the hydraulic model and how this could interact with GALs proposed mitigation measures in the River Mole catchment for the NRP. We note Section 5.2.17 of the FRA refers to the Flood Consequence Assessment (FCA) drain down time of the 20% (1 in 5) Annual Exceedance Probability (AEP) event. What is the drain down time of the proposed FCAs for the full range of flood events modelled?

Finally, GAL is aware of Thames Water's comments on wastewater which state that they believe that the network has insufficient capacity for the development and upgrades are likely to be required. The proposed development is a mixed use scheme for residential and commercial development therefore planning permission should not be recommended unless there is an agreed approach to how wastewater will be dealt with. Thames Water's response does not seem to consider the impacts to their own treatment works. GAL consider that either a Grampian condition should be applied to the grant of any planning permission if the detailed approach to wastewater is not forthcoming from the Applicant and Thames Water.



Summary

GAL is objecting to the HCA application for the reasons provided in this letter.

We request that the information asked for in this letter is provided by the Applicant at the earliest opportunity so that it can be considered further alongside the points raised.

GAL reserves the right to comment further on the application proposals once further consultation responses are received and if the Applicant provides any further information or amends any aspect of the proposal right up to its final determination.

Please do not hesitate to contact me should you wish to discuss any of the points raised in this letter.

Yours sincerely,



Planning Manager
Gatwick Airport Ltd

Encs. Draft London Gatwick Bird Hazard Management Plan



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APPENDIX 1

GAL Recommended Aerodrome Safeguarding Conditions

Height Limitation on Buildings and Structures

Buildings and structures on this site must not exceed the heights shown on Drawing no. WOI-HPA-PLAN-PP04-01 - Parameter Plan 4 : Building Heights (as amended to reflect the comments made on the Northern Area above). All development in this area will still need to be the subject of both navigational aids and instrument flight procedures impact assessments.

Reason: Development exceeding these height parameters could penetrate the Obstacle Limitation Surface (OLS) surrounding London Gatwick Airport and development up to and exceeding this height could endanger the safe operation of London Gatwick Airport through interference with navigational aids.

Submission of Lighting Schemes

Prior to the commencement of any development, details of lighting used for both the construction phase and the permanent lighting scheme(s) for the development shall be submitted to the Local Planning Authority for their written approval. The approved lighting scheme is to be implemented as approved; no subsequent alterations shall take place unless first submitted to and approved in writing by the Local Planning Authority.

Reason: It is necessary to control the lighting arrangements on this development to avoid confusion with aeronautical ground lights and to prevent glint and glare which could endanger the safe movement of aircraft and the operation of London Gatwick Airport.

Submission of Landscaping Scheme

No development shall take place until full details of soft and water landscaping works have been submitted to and approved in writing by the Local Planning Authority in consultation with Gatwick Airport. These details shall include:

- Any earthworks
- Grassed areas
- The species, number and spacing of trees and shrubs
- Details of the enhanced River Mole Corridor
- Details of any new water bodies to be created

No subsequent alterations to the approved landscaping scheme are to take place unless submitted to and approved in writing by the Local Planning Authority in consultation with Gatwick Airport. The scheme shall be implemented in accordance with the approved details.



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Reason: To avoid endangering the safe movement of aircraft and the operation of London Gatwick through the attraction of birds and an increase in the bird hazard risk of the application site.

Submission of SUDS Details

Development shall not commence until details of the Sustainable Urban Drainage Schemes (SUDS) have been submitted to and approved in writing by the Local Planning Authority. The submitted Plan shall include details of:

- Attenuation times (must be 24 hours or less)
- Profiles & dimensions of water bodies
- Details of marginal planting
- On going maintenance to ensure drain down times are maintained

No subsequent alterations to the approved SUDS scheme are to take place unless first submitted to and approved in writing by the Local Planning Authority. The scheme shall be implemented as approved.

Reason: To avoid endangering the safe movement of aircraft and the operation of London Gatwick through the attraction of Birds and an increase in the bird hazard risk of the application site.

Additional Notes:

The suggested inclusion of this condition is based on the Applicant's confirmation that all surface SuDS features in the proposed drainage systems, including swales and detention features, would have a drain down time not exceeding 24 hours.

Submission of a Bird Hazard Management Plan

Development shall not commence until a Bird Hazard Management Plan has been submitted to and approved in writing by the Local Planning Authority. The submitted plan shall include details of:

- Monitoring of any standing water within the site during the construction phase
- Monitoring of the earthworks during the construction phase
- Monitoring of the SUDS & River Mole areas
- Management of any flat/shallow pitched/green roofs on buildings within the site which may be attractive to nesting, roosting and 'loafing' Gulls

The Bird Hazard Management Plan shall be implemented as approved upon commencement of the building works and shall remain in force in perpetuity. No subsequent alterations to



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the plan are to take place unless first submitted to and approved in writing by the Local Planning Authority.

Reason: It is necessary to manage the site in order to minimise its attractiveness to birds which could endanger the safe movement of aircraft and the operation of London Gatwick.

Additional Notes:

A draft Bird Hazard Management Plan has been provided for information, however this could be subject to change once further details of the River Mole corridor enhancement, landscaping and further SUDS details have been submitted.

Submission of Renewable Energy Scheme

No development shall take place until full details of any proposed renewable energy schemes have been submitted to and approved in writing by the Local Planning Authority.

No subsequent alterations to the approved renewable energy scheme are to take place unless submitted to and approved in writing by the Local Planning Authority. The scheme shall be implemented as approved.

Reason: To ensure the development does not endanger the safe movement of aircraft or the operation of London Gatwick through interference with communication, navigation and surveillance equipment or glint and glare issues.

Additional Notes:

GAL would not wish to see wind turbines proposed for this site as they have the potential to infringe the protected surfaces around the airport and the rotation of the blades can impact on radar and other communications, navigation and surveillance equipment.

Submission of a Construction Management Strategy

Development shall not commence until a Construction Management Strategy has been submitted to and approved in writing by the Local Planning Authority covering the application site and any adjoining land which will be used during the construction period. Such a strategy shall include the following matters:

- Details of the area(s) subject to construction activity and the storage of materials and equipment
- Details of cranes and other tall reaching construction equipment (including the details of obstacle lighting) – such schemes shall comply with CAP 1096



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'Guidance to crane users on aviation lighting & Notification' available at www.caa.co.uk

- Control of activities likely to produce dust and smoke etc.
- Details of temporary lighting
- Control and disposal of putrescible waste to prevent attraction of birds

The approved strategy, or any variation approved in writing by the Local Planning Authority, shall be implemented for the duration of the construction period.

Reason: To ensure that construction activities and construction equipment on the site and adjoining land does not breach the Obstacle Limitation Surface (OLS) surrounding London Gatwick and does not interfere with communication, navigation and surveillance equipment which could endanger the safe operation of the aerodrome.

Cranes & Tall Reaching Construction Equipment

No cranes or scaffolding shall be erected within the development hereby permitted on the site unless and until construction methodology and diagrams clearly presenting the location, maximum operating height and radius and start/finish dates for the use of cranes during the Development have been submitted to, and approved in writing by the Local Planning Authority, in consultation with Gatwick Airport Limited. These cranes must be assessed against London Gatwick Airport's Instrument Flight procedures (IFPs) by a CAA approved procedure designer. The information described above along with the IFP report for each building must be submitted to and approved in writing by the Local Planning Authority.

Reason: To ensure that construction work and construction equipment on the site and adjoining land does not create an unacceptable penetration of the Obstacle Limitation Surface (OLS) and the Instrument Flight Procedures (IFP's) surrounding London Gatwick Airport and endanger aircraft performance and the safe operation of the aerodrome.

The imposition of this prior to commencement planning condition is considered necessary to prevent commencement of works until the requirements have been met because the timing of compliance is fundamental to the decision to grant planning permission.

Additional Notes:

It is recommended that the following text is added as an informative:

Given the nature of the proposed development, it is possible that a crane or tall reaching construction equipment may be required during construction/installation. We would, therefore, draw the Applicant's attention to the requirement within the British Standard Code of Practice for the safe use of Cranes, for crane operators to consult the aerodrome before erecting a crane in close proximity to an aerodrome for further information please visit



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[Cranes | Permits | London Gatwick Airport](#) or email cranes@gatwickairport.com. The operator is also required to submit details to the CAA Airspace Coordination and Obstacle Management Service (ACOMS) system at [Crane notification | Civil Aviation Authority \(caa.co.uk\)](#)

It is important that GAL is fully consulted from a safeguarding perspective on all Reserved Matters Applications submitted pursuant to outline elements of the Hybrid planning application.

The Council should contact GAL's Aerodrome Safeguarding Officer should they have any queries.



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Appendix 2 Noise Contour Mapping

Figure 1.1 Gatwick 2024, Leq 16 hr

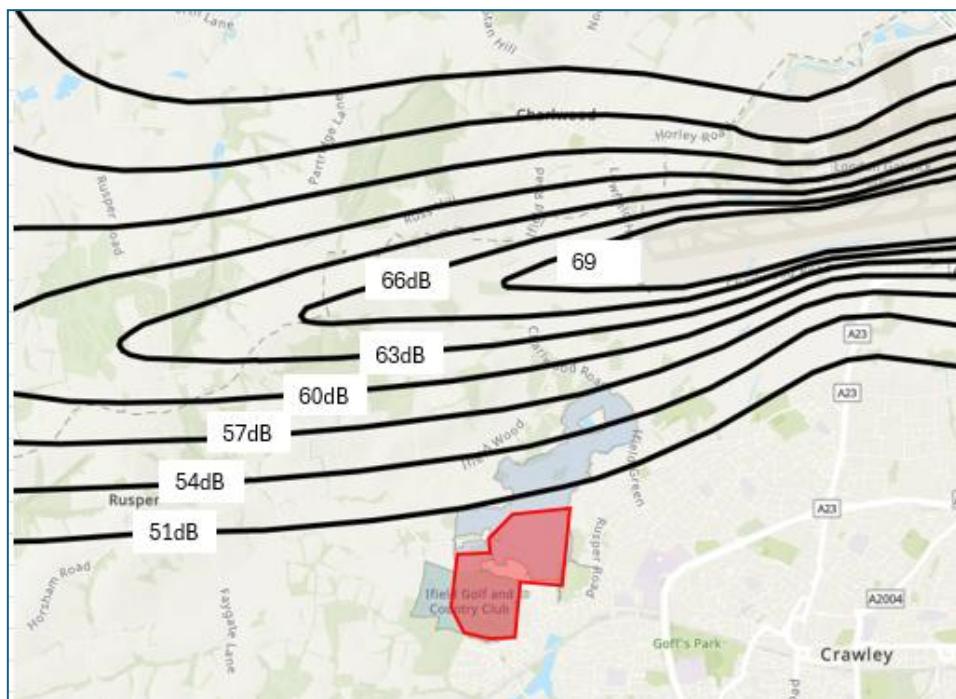
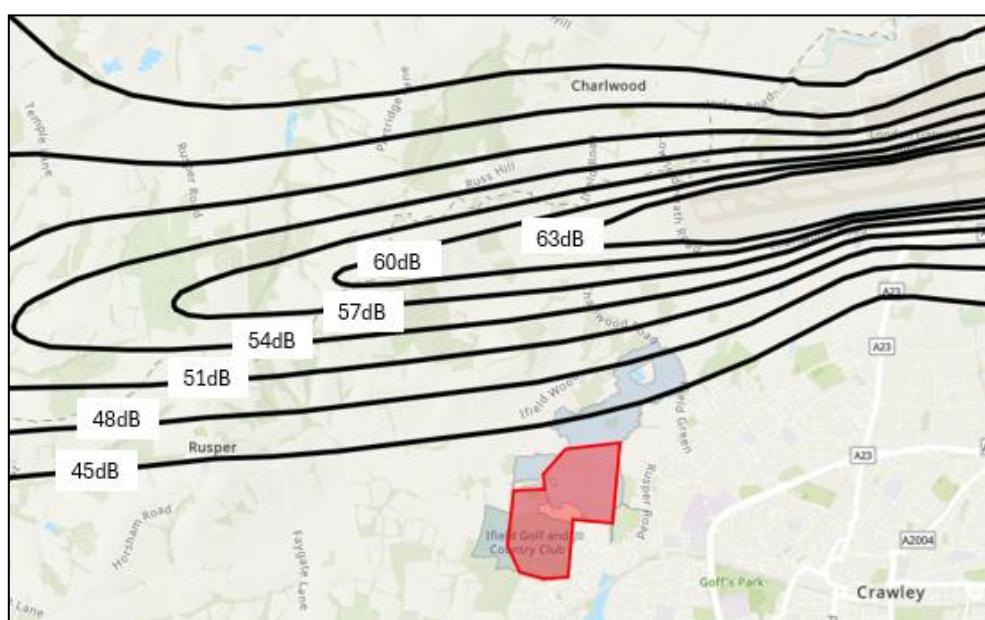


Figure 1.2 Gatwick 2024, Leq 8 hr Night





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Figure 1.3 Gatwick 2024, N60 Night

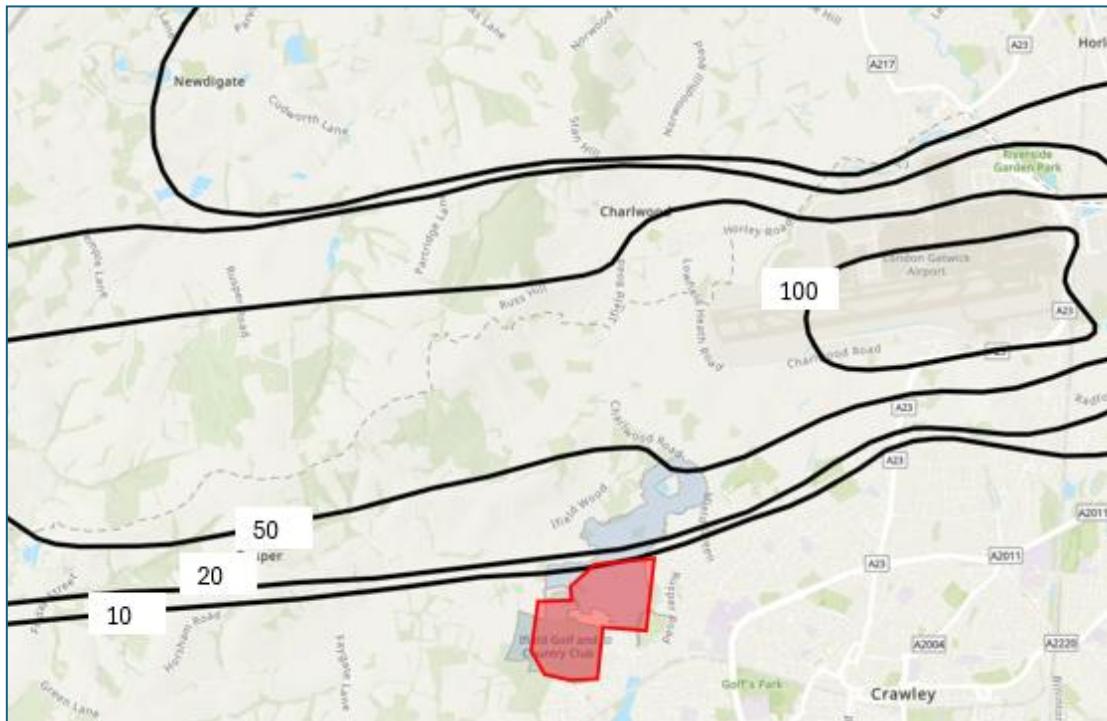
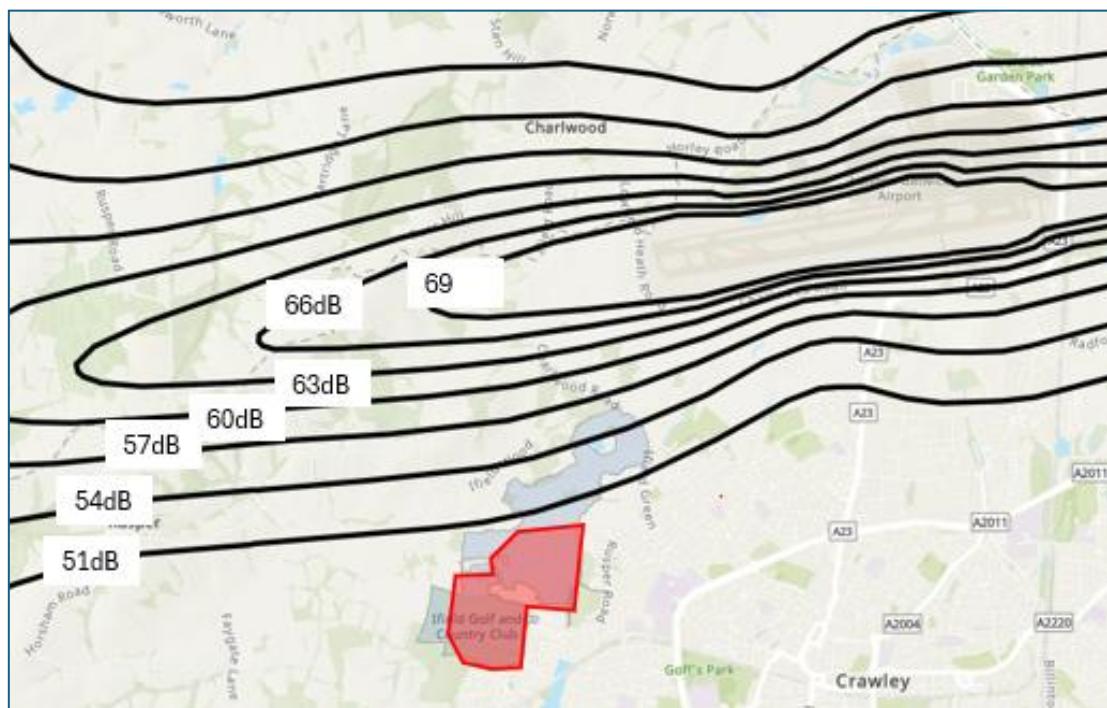


Figure 1.4 Gatwick NRP 2032 Updated Central Case Fleet, Leq 16 hr





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Figure 1.5 Gatwick NRP 2032 Updated Central Case Fleet, Leq 8 hr Night

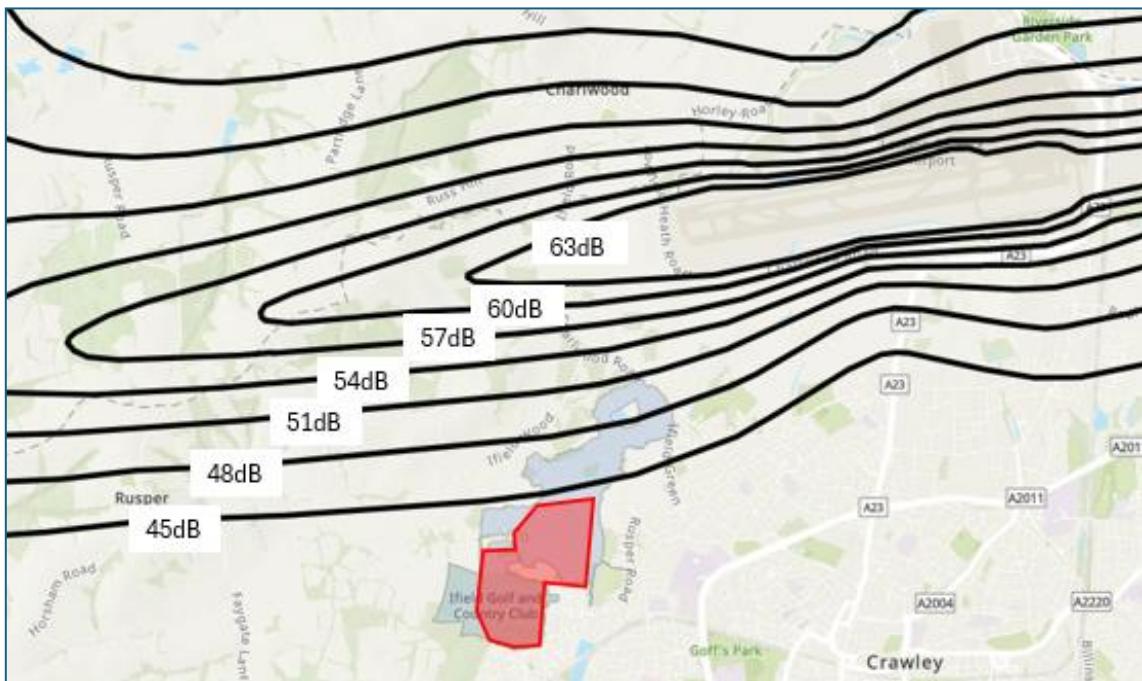
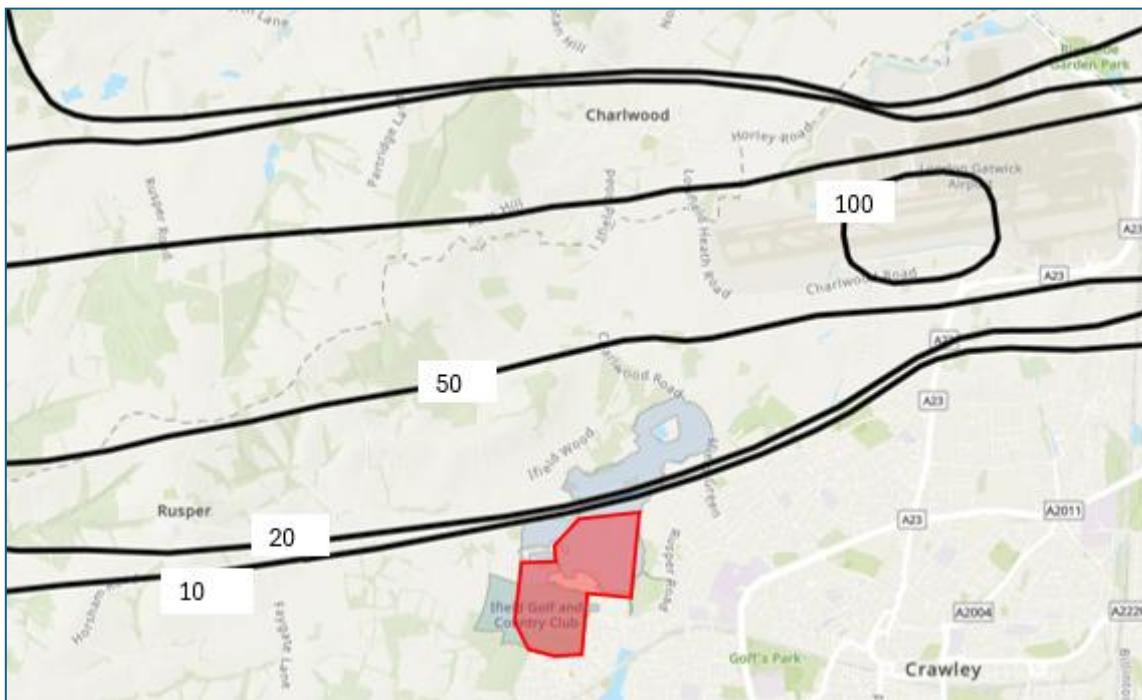


Figure 1.6 Gatwick NRP 2032 Updated Central Case Fleet, N60 Night

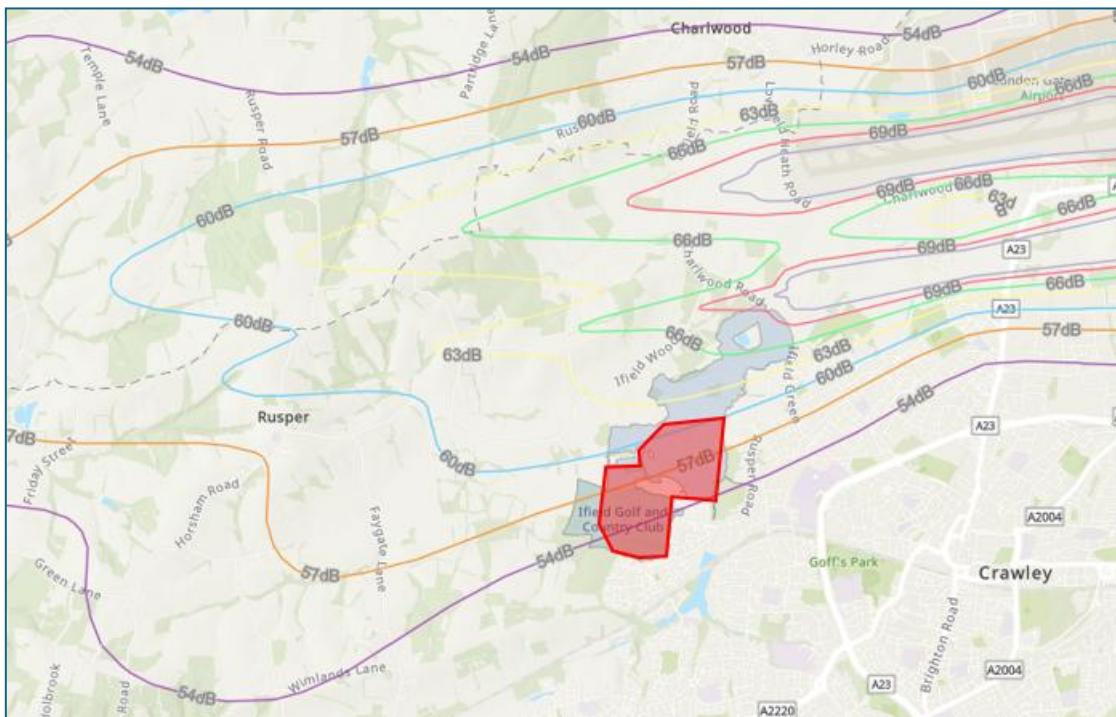




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Figure 1.7 Gatwick Second Runway 2019 Masterplan: 2040 Leq 16 hr



Appendix 3

Detailed Highways & Transportation Comments

General comments on the hybrid nature of the application

Several of the factors influencing mode share relate to the outline permission and greater certainty is required over when/how measures come forward and what plans HCA has if trip rates for external trips are higher than planned, and/or mode shares are not as assessed for the proposed highway improvements.

GAL would expect to see greater sensitivity analysis of the impacts of different outcomes to ensure the robustness of proposed mitigation. What further mitigation or actions by the Applicant would be triggered if the expected transport outcomes are not achieved and how would these be funded?

Transport Modelling

It is understood that the transport modelling is based on the Crawley Transport Model, as prepared for the Crawley Local Plan, with the statement that this is the most suitable model for the Transport Assessment. It is understood that the Crawley Transport Model was validated to 2015 data and has been used for subsequent iterations of the Crawley Local Plan with the latest modelling undertaken in 2022. GAL requires confirmation as to whether the Crawley Transport Model has been calibrated or validated against more recent data than 2015 and/or has consideration of post-Covid analysis been undertaken at a high level and in accordance with the DfT's Transport Appraisal Guidance (TAG)?

It is noted that earlier versions of the Crawley Transport Model contained coding errors in the areas of Rusper Road and Ifield Wood that were corrected in the Reference Case model (Crawley Local Plan – Crawley Transport Study Report (February 2022) page 28, paragraphs 3.7.1 and 3.7.2). The report goes on to say that it was not “considered necessary to re-run the Local Plan scenarios with the amendment to link length and update junction analyses”. GAL require confirmation that the coding errors were corrected in all model runs used to support the Transport Assessment for the HCA application and that local traffic assignment pertinent to the traffic junction assessments have been validated sufficiently against observed flows to ensure that the Transport Assessment can be relied upon.

Paragraph 9.63 in the Transport Assessment states, “*The modelling results demonstrate that the junction operates within capacity.*” However, the table of results to which it refers (Table 9.4: Crawley Western Link/Charlwood Road/Bonnetts Lane/Ifield Avenue/Ifield Green Junction Capacity Assessment - 2041 Future Year With Development + Committed Developments) shows a number of movements approaching, at or over capacity (degree of saturation above 90% and

over 100%). GAL requires further explanation as to why this junction is considered to be operating within capacity and requires no further mitigation.

Paragraph 9.80 in the Transport Assessment indicates an increase in queueing at the A264 Crawley Avenue/Faygate Lane junction in both directions on the A264 Crawley Avenue (with the development in the 2041 Future Year modelling). The model results indicate this is an existing issue for congestion, but that this is exacerbated with the development, which sees delays in both the AM and PM peak hours when comparing 2041 “with development” and “without development”. In the AM peak hour, the longest queue length (A264 Crawley Road West, i.e. eastbound approach) increases by over 160m or 29 passenger car units (pcus) and average delay increases by 87 seconds per vehicle. In the PM peak hour, the longest queue length (A264 Crawley Road East, i.e. westbound approach) increases by over 450m (80 pcus) and average delay increases by 120 seconds per vehicle. Whilst this junction is some distance from the development it indicates the level of saturation in the local network and the importance of the A264 between Horsham and Crawley and access to the M23.

The Transport Assessment takes the approach that if a junction is an existing or forecast problem without the development, then no additional mitigation is required, even if the development causes a significant worsening of the existing or predicted congestion without mitigation. This is not deemed to be an acceptable approach. GAL would welcome further information on any engagement between HCA, Crawley Borough Council, Horsham District Council and National Highways that seeks to ensure the local road network and access to the Strategic Road Network is capable of accommodating the additional demands of the proposed development safely without mitigation on this important corridor.

Behaviour Change to Sustainable Modes

The Transport Assessment notes the potential for behaviour change to reduce or minimise the increase in car journeys arising from the proposed development and proposes a move away from a “predict and provide” approach to a “decide and provide” approach for off-site mitigation. It further proposes a “Monitor and Manage” approach to *“allow the mitigation strategy to be managed, with interventions either coming forward earlier or later than anticipated. Where impacts are not as predicted, then remedial measures will be implemented.”* No further information is provided for “remedial measures”, and no commitment is given to funding further mitigation measures should monitoring suggest there is a need.

Given the uncertainty around bringing forward as yet unspecified measures to encourage sustainable travel, and the extent of existing and forecast congestion in the A264 corridor, GAL would welcome further information and reassurance of how potential impacts would be addressed based on the “monitor and manage” framework.

Measures proposed through the intended Section 106 Agreement to support sustainable travel are welcomed and are consistent with the intention to increase the proportion of journeys made by public transport and active travel modes. However, no information is provided on how effective these measures would be and how they have been assessed, to show the extent of mode shift achieved. Instead, the proposals provide a framework for intended travel planning but with no certainty and no modelled analysis of their effectiveness. Without some sensitivity analysis around the outcomes from these proposals, there remains a risk that the number of car journeys may be greater than assessed in some areas of the local network.

Further information is requested to support the choice of travel plan measures and how they contribute to achieving the proposed mode shares.

Transport Strategy

Reference is made in the Transport Strategy supporting the Transport Assessment to exemplar developments at Burgess Hill and Northstowe that reflect the level of ambition for sustainable travel at West of Ifield. The evidence from these developments provides a high-level summary of measures implemented or proposed, but no evidence is provided for how effectively these measures have influenced mode choice, what sustainable mode shares were proposed for each development and if these have been met. Without such evidence it is difficult to give any weight to the effectiveness of similar proposals to meet the ambitious targets set out for West of Ifield. GAL requests that further information is provided on the sustainable mode shares achieved for the quoted developments and how these differ from background mode shares (i.e. what improvement has been achieved for the development).

The Transport Strategy (paragraph 9.3) includes reference to three appendices, including Appendix C, which is claimed to include *“evidence provided and detailed methodology for deriving the mode shares”*. These appendices are missing from the material presented for consultation and should be provided at the earliest opportunity to provide confidence in the validity of the proposed mode shares.

Travel Plan

The Travel Plan accompanying the Transport Assessment sets out a range of measures relevant to the outline permission being sought. These are presented as supporting the proposed mode shares, which assumes low proportions of car-based trips external to the development (car driver and car passenger). It is noted that no baseline travel surveys have been undertaken but interim surveys are proposed during construction to inform the development of the Travel Plan. In paragraphs 4.6 and 4.7, it states that the interim survey results are to be *“...used to form targets which can be measured against the achievement of the set objectives. Once the baseline data is collected there will be a better understanding of what is achievable and the most suitable measures...”*.

The quality of the existing public transport network, including availability of rail connectivity from local stations and the successful "Fastway" bus network is stated as supporting the location for development. However, no reference is made to how these are reflected in observed mode shares for local residents in areas neighbouring the proposed development, which could have been established through baseline surveys. The measures proposed for new bus routes, active travel provision and improvements at local railway stations are acknowledged and welcomed but this is currently disconnected from any assessment of the propensity for the current population to choose to travel by sustainable modes in already well-served areas. It is therefore difficult to consider how ambitious the proposed mode share targets are and how effectively the Travel Plan should be viewed. Further analysis demonstrating the robustness of the mode share targets should be provided and greater confidence given over the extent of mitigation that HCA will fund to ensure the assessed transport impacts of the development will not be exceeded.

Construction Vehicle Routes

Appendix P (Part 2) of the Transport Assessment shows Construction Vehicle Routes, indicating the proportion of construction vehicle traffic using different parts of the A23 and A264 through Crawley. Whilst the key shows the proportions of vehicles assumed on each route, the routes cannot be distinguished within the image. Furthermore, there is no information provided to justify the percentages shown to split construction traffic - nor are these routes discussed or described in the Construction Traffic Management Plan. A clearer image and clear justification for the choice of routes should be provided including modelling of the effects on the highway network.

One of the routes shown is the A23 between Crawley and Horley passing Gatwick Airport. It is acknowledged within the Transport Assessment that as part of its NRP DCO application, that GAL proposes a significant upgrade to the A23 London Road and Longbridge Roundabout, south of Horley, in connection with improvements to Airport Way and the M23 Spur leading to/from M23 Junction 9. Clarity is required on the timing and extent of vehicle movements on this part of the network that could coincide with extensive highway works, and how HCA intends to mitigate and avoid construction traffic using this route.

Crawley Western Multi-Modal Corridor (CWMMC)

It is noted that the section of the Crawley Western Multi-Modal Corridor (CWMMC) is a small part of a longer corridor of improvement supported by the Crawley Local Plan, specifically a connection east to the A23. Crawley Borough Council has safeguarded land for the eastern extension but it is accepted that this is not required to support the West of Ifield hybrid application.



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Paragraph 4.2.3 of the Transport Assessment states "*The first phase of a Crawley Western Multi-Modal Corridor (CWMMC) from Charlwood Road will support the Proposed Development but will be designed appropriately to provide a future relief function as part of a full CWMMC, if it is extended to the A23 and A264 in the future.*" However, the Transport Assessment and associated documents do not make clear how the eastern extension, as proposed in the Crawley Local Plan, will tie into the proposed design for the proposed development and if the design is compatible with, or affects, any of the proposed alignments. GAL would like the Applicant to provide further information on how the proposed junction at Charlwood Road/Ifield Avenue complements the proposals in the Crawley Local Plan for further development of the CWMMC and any future impacts on the junction arrangement and operation over the forecasting period for the development.

Bird Hazard Management Plan

Planning Application No: DC/25/1312

Gatwick Airport Ref No: LGW5931

Site Address: Land West of Ifield, Charlwood Road, Ifield

Background:

This Bird Hazard Management Plan seeks to minimise the potential birdstrike risk to aircraft operating into and out of Gatwick Airport, which could arise from the development of 3,000 homes, commercial, business and services, general industrial, storage or distribution, hotel, community and education facilities, gypsy and traveller pitches, sports pitches, infrastructure, landscaping and public open spaces on Land West of Ifield, Charlwood Road, Ifield. This management plan has been developed in response to concerns expressed by Gatwick Airport Ltd concerning the possible birdstrike hazard to aircraft operating from Gatwick Airport and in the light of CAA (Civil Aviation Authority) 139/2014 'UK Acceptable Means of Compliance' and as contained in Circular 01/2003 – Safeguarding Aerodromes, Technical Sites & Military Explosives Storage Areas: The Town & Country Planning (Safeguarded Aerodromes & Military Explosives Storage Areas) Direction 2002.

This Bird Hazard Management Plan has been agreed by the applicant, Horsham District Council and Gatwick Airport Ltd as administrators of airport safeguarding matters for Gatwick Airport.

It should be noted that this Bird Hazard Management Plan is designed particularly for the situation at Land West of Ifield, Charlwood Road, Ifield and is not necessarily appropriate for other sites in the vicinity of Gatwick Airport.

Extent of the Agreement

The parties identified above have agreed this Bird Hazard Management Plan as set out below. It shall apply to the proposed mixed use development on Land West of Ifield, Charlwood Road, Ifield as detailed in planning application DC/25/1312. This will reduce the attractiveness of the proposed development to the target species.

This Bird Hazard Management Plan identifies a number of measures which seek to control and reduce the potential birdstrike hazard, through the monitoring of target bird species and the successful prevention of breeding by Geese.

Implementation

This Bird Hazard Management Plan must be implemented on the day works commence on site and must remain in perpetuity or until otherwise agreed in writing with Gatwick Airport Ltd.

Bird Hazard Management Plan Requirements

Earthworks/Construction Phase

Site management:

Soil stripping will happen on a 'just in time' basis to minimise areas of bare earth. Areas of puddling should be drained as soon as possible to prevent an attractant forming, and if they are attracting target species should be drained as soon as possible. Earth bunds and stockpiles should be monitored (as below) and if attracting birds should be covered (eg tarpaulin or tar spray), compacted, or removed to reduce the attraction.

Implementation: This part of the Bird Hazard Management Plan must be implemented as soon as any earthwork commence on the site and shall remain in force until the earthworks are completed.

Target Species:

The measures set out in this Bird Hazard Management Plan relate to the bird species most hazardous to aircraft, for example those of large size and/or which habitually form flocks, in relation to this element of the Bird Hazard Management Plan, the species of concern are:

- All gull species
- Corvids
- Pigeons

Frequency of Site Inspections

Three times daily. If hazardous birds are found above threshold levels then this will increase to hourly for the rest of the day.

Thresholds & Actions

If more than 50 birds of any one species type (gulls, pigeons or corvids) are attracted to the site then further action will be taken. This will include manual disturbance initially to disperse them. If birds are persistently present (on more than 3 occasions in the same area) the further measures such as draining puddles or covering, compacting or removing top soil stockpiles will be necessary to remove the attraction.

Methods of Dispersal:

To be completed by the developer

Failure Criteria:

If flocks of more than 50 are not dispersed successfully on detection, if more than 100 birds of any target species group are present on three or more consecutive days, or if additional habitat management to address an identified attractant are no

carried out (such as draining of puddles of covering, compacting or removal of top soil which is attracting birds to feed).

Record Keeping:

A log will be kept which will detail the following:

- Dates and times of inspections
- Who carried out the inspections
- Bird numbers and species seen
- Details of any dispersal action taken along with details of any nests/eggs removed.
- The log must be available to London Gatwick Airfield Operations staff to view upon request.

Flat/Shallow Pitched & Green Roofs

Implementation: This part of the Bird Hazard Management Plan must be implemented in phases as and when each area of flat/shallow pitched/green roofs is completed. Individual dwelling houses are exempt. The requirement must remain in perpetuity or until otherwise agreed in writing with Gatwick Airport Ltd.

Target Species:

The measures set out in this Bird Hazard Management Plan relate to the bird species most hazardous to aircraft, for example those of large size and/or which habitually form flocks, in relation to this element of the Bird Hazard Management Plan, the species of concern are:

- All Gull species.

Frequency of Site Inspections

The roofs must be constructed in such a manner so that all areas are safely accessible to enable any nests and eggs to be cleared and birds to be dispersed.

- Checks will be made weekly or sooner if bird activity dictates, during the breeding season by an appointed person/company. The breeding seasons for gulls typically runs from March to June.
- Checks will be made on a regular basis, as dictated by bird activity, outside of the breeding season by a nominated person/company.

Thresholds & Actions

- Any Gulls found nesting and/or roosting and/or loafing during the breeding season will be dispersed when detected and/or when requested by London Gatwick Airfield Operations staff. In some instances, it may be necessary to contact London Gatwick Airfield Operations staff before bird dispersal takes place.
- Any nests or eggs found will be removed. A CL12 licence must be obtained from Natural England before any removal takes place, please contact: bird.licensing@naturalengland.org.uk For further information with regard to the CL12 licence please see:

[Birds: licence to kill or take them for air safety purposes \(CL12\) - GOV.UK \(www.gov.uk\)](https://www.gov.uk/guidance/birds-licence-to-kill-or-take-them-for-air-safety-purposes-cl12)

- Any Gulls found roosting and/or loafing outside of the breeding season will be dispersed when detected and/or when requested by London Gatwick Airfield Operations Staff. In some instances it may be necessary to contact London Gatwick Airfield Operations staff before bird dispersal takes place.

Methods of Dispersal:

To be completed by the developer

Failure Criteria:

Gulls successfully nest and fledge young on any roof managed under the plan.

Record Keeping:

A log will be kept which will detail the following:

- Dates and times of inspections
- Who carried out the inspections
- Bird numbers and species seen
- Details of any dispersal action taken along with details of any nests/eggs removed.
- The log must be available to London Gatwick Airfield Operations staff to view upon request.

SUDS Basins/River Mole Enhancements

Implementation: This part of the Bird Hazard Management Plan must be implemented as soon as the first SUDS basin is complete or upon commencement of the river mole enhancements, whichever is sooner. The requirement must remain in perpetuity or until otherwise agreed in writing with Gatwick Airport Ltd.

Target Species:

The measures set out in this Bird Hazard Management Plan relate to the bird species most hazardous to aircraft, for example those of large size and/or which habitually form flocks, in relation to this element of the Bird Hazard Management Plan, the species of concern are:

- Waterfowl (including ducks and feral geese)
- All gull species

Frequency of Site Inspections

Quarterly to ensure basins are dry and after extreme rainfall to ensure that the basins drain as modelled and are not attracting hazardous birds.

Thresholds & Actions

If the basins are holding water more frequently than modelled, or for longer, then remedial action will be carried out to rectify this.

Methods of Dispersal:

To be completed by the developer

Failure Criteria:

If the basins are holding water more frequently or for longer than modelled.

Record Keeping:

A log will be kept which will detail the following:

- Dates and times of inspections
- Who carried out the inspections
- Bird numbers and species seen
- Details of any dispersal action taken along with details of any nests/eggs removed.
- The log must be available to London Gatwick Airfield Operations staff to view upon request.

Review of the Management Plan

This Bird Hazard Management Plan shall be subject to review to reflect changes in habitat or populations of target bird species. Should the airport deem it necessary a meeting Gatwick Airport Ltd, the applicant and if necessary the Local Planning Authority and/or the Civil Aviation Authority, will be convened at the earliest opportunity to discuss and agree any changes which may be necessary.

Inspection & Site Access

Gatwick Airport Ltd, the Local Planning Authority or the Civil Aviation Authority or their nominated representative will be allowed access to the site to evaluate the success of this Bird Hazard Management Plan and to review any remaining birdstrike hazard.

Long Term Management

This Bird Hazard Management Plan will remain enforceable by Gatwick Airport Ltd, the Local Planning Authority and/or the Civil Aviation Authority or any successor to these bodies unless otherwise agreed in writing by Gatwick Airport Ltd. These obligations will be passed to any subsequent owners/tenants of the land to which this development relates.

Signature:

Organisation:

Date: