



Gatwick Airport Northern Runway
National Infrastructure Project
TR020005

Written Representation

Interested Party Reference: 20044737

12th March 2024

1.0 Introduction

1.1 A joint Local Impact Report (LIR) has been prepared by West Sussex County Council, Crawley Borough Council, Horsham District Council and Mid Sussex District Council. This written representation provides further detail on matters that are of specific importance to Mid Sussex District Council. It does not seek to repeat matters raised in the Joint LIR that are common to the four local authorities.

2.0 Background

- 2.1 Mid Sussex District Council is an adjoining authority to the Gatwick Airport Northern Runway National Infrastructure Project (NSIP). The District lies about 2km south-east from the edge of the project, separated from the administrative boundary of Crawley, and Gatwick Airport, by the M23.
- 2.2 Mid Sussex District Council works collaboratively with the host authorities and the neighbouring authorities. The ten Joint Local Authorities (JLAs) have well-established joint working arrangements in responding to and engaging on this project. This joint working is led by Chief Executive and Council Leaders and supported by officers at various levels, including technical officers. Where practicable the JLAs have secured joint technical specialists and consultants to support the work of the local authority officers.
- 2.3 The expansion of Gatwick Airport proposed in this NSIP will have clear and specific impacts on Mid Sussex District. Mid Sussex District Council, along with Horsham District Council, have the closest functional relationship in planning terms with Crawley (the Borough in which the majority of the NSIP development would be delivered). Together, Mid Sussex, Horsham and Crawley comprise the North West Sussex Housing Market area and Functional Economic Market Area. As a result, the three authorities have strong social and economic links. The North West Sussex authorities have a long history of joint working, including Local Plan work, and our evidence base demonstrates the socio-economic links between the authorities, as set out in the Strategic Housing Market Assessment (2021) and Mid Sussex Economic Growth Assessment (March 2022). The Applicant's evidence base corroborates this in showing that it will rely on the labour supply in Mid Sussex to fill new jobs at the expanded airport and new jobs will be created in Mid Sussex due to the proximity of the airport.
- 2.4 In addition, Mid Sussex has direct links to the airport by road (A23/M23) and rail (Brighton mainline comprising Hassocks, Burgess Hill, Wivelsfield, Haywards Heath and Balcombe stations). The expansion of the airport is anticipated to put additional pressure on transport infrastructure in the District.

3.0 Mid Sussex Specific Matters

Case for development and proposed mitigation

- 3.1 During the pre-application period, Mid Sussex and other Local Authorities had raised concerns regarding the meaningfulness of the Applicant's handling of consultation and engagement, as evidenced in the Joint Adequacy of Consultation report.
- 3.2 Mid Sussex remains to be satisfied that the Applicant has presented a robust evidence base to justify the Application and to provide measures to mitigate the social, environmental and economic impacts of the Project. These include:

- 3.2.1 The Applicant's failure to present an appropriate need/capacity case for progressing this NSIP. This includes issues with the aircraft sequencing and the bottom-up demand approach adopted which has generated over-optimistic forecasts of capacity and the derived economic benefits arising from such growth and the consequential impacts on mitigation triggers.
- 3.2.2 The lack of evidence of specific measures to demonstrate that the various targets set by the Applicant can be met or that mitigations can be achieved e.g. surface access targets or other environmental parameters associated with noise and air quality.

Increased overflight of Area of Outstanding Natural Beauty

- 3.3 The Council is yet to be satisfied that there will not be more intensive use of flightpaths that are currently infrequently used, in particular route 9/WIZAD, which is a Tactical Offload Route. This route is not currently frequently flown. Any intensification in its use will be noticeable and will cause harm to the special characteristics of the protected landscape i.e. the High Weald AONB. The impact on the High Weald AONB is of particular concern to Mid Sussex as 50% of the northern part of the District is within the designation. The Council is concerned that noise impacts on the High Weald AONB in Mid Sussex, including historic parks and gardens within the AONB, have not been robustly assessed.
- 3.4 Chapter 9 of the West Sussex Local Impact Report sets out the Authority's position on the impact of the Project on Landscape, Townscape and Visual Impacts.
- 3.5 The National Planning Policy Framework (2023) at paragraph 191 states, in relation to ground conditions and pollution:
 - “Planning policies and decisions should also ensure that new development is appropriate for its location taking into account the likely effects (including cumulative effects) of pollution on health, living conditions and the natural environment, as well as the potential sensitivity of the site or the wider area to impacts that could arise from the development. In doing so they should:
 - [...]
 - (b) identify and protect tranquil areas which have remained relatively undisturbed by noise and are prized for their recreational and amenity value for this reason;
 - [...]
- 3.6 The High Weald AONB Management Plan (2019), at Objective OQ4, seeks to “Protect and promote the perceptual qualities that people value”. The proposed actions include: “Act to remove and reduce inappropriate noise intrusion, supporting further study into the impacts of noise, such as aircraft noise and traffic on quiet enjoyment”.
- 3.7 Environmental Statement (ES) Chapter 8 (APP- 109) section 8.9 does include an assessment of the effects on the perception of tranquillity within the High Weald AONB. It draws the conclusion that the magnitude of change is generally considered to be negligible and the level of effect up to ‘minor adverse’. Mid Sussex considers that the Applicant's assessment of impact on tranquillity has underplayed the magnitude of change arising from the increase in overflights above nationally designated landscapes. The High Weald AONB Management Plan states that its tranquillity is a valued characteristic, therefore additional noise disturbance is likely to be harmful.
- 3.8 ES Chapter 8 Table 2.2.7 (APP-109) indicates a 15 – 20% increase in overflight will have a negligible magnitude of change in perception of tranquillity, with a negligible to minor adverse effect.

- 3.9 Figure 8.6.7 (APP – 061) shows that in 2032, with the project, parts of the western section of the AONB will move from 11 – 51 daily overflights to 50 – 100 daily overflights. It is not stated anywhere in the documentation to what extent this increase would be attributable to Gatwick alone with the project in place. This indicates that there could be a significant increase in the number of overflights over parts of the AONB. It is also a greater percentage increase than indicated in table 2.2.7 (APP-109). The increased frequency of overflight, over areas which are tranquil in nature, will be very noticeable, and harmful to the special characteristics of the protected landscape.
- 3.10 The Council is not satisfied that route 9/WIZAD will not be used routinely to achieve the number of take-offs per hour projected, as set out in the York Aviation report, Appendix C to the LIR. Route 9 overflies the western area of the AONB. As this route is a Tactical Offload Route and not currently frequently flown, any intensification in the use of this route will be noticeable and will cause harm to the special characteristics of the protected landscape. Therefore, the use of this route needs to be controlled.

Traffic and Transport: Surface Access Commitments: Bus and Coach services

- 3.11 Mid Sussex is a rural district, characterised by three main towns - East Grinstead, Haywards Heath and Burgess Hill. There are also several large villages and many smaller settlements. Due to the dispersed nature of its population, the bus services that operate in Mid Sussex are not frequent and routes available are sparser than found in more urban areas such as Crawley.
- 3.12 Whilst Mid Sussex experiences low levels of deprivation, the lack of alternative transport modes to access the airport will prevent people without access to a car from accessing jobs arising from the project. Without good transport provision residents in the rural areas of the district will be unable to access the airport. This issue is even more acute given the unsociable hours of shift work.
- 3.13 We welcome the commitment in the Surface Access Commitment document (App-090) to provide 'reasonable financial support for direct services from Crawley Down and Copthorne'. We welcome further discussion with the Applicant on this matter to ensure it secures meaningful mitigation.
- 3.14 There is also a commitment to improve bus/ coach provision over longer distance routes to the east of the airport where access via rail network is not available. The commitment to the provision of a half hourly service is welcomed, but further detail is needed over routing, frequency and the duration of subsidies for routes.
- 3.15 There is significant housing growth planned in Mid Sussex. It is not clear how the Surface Access Commitments will be kept up to date and relevant to increasing populations and changes to settlement patterns. The Council's Submission Draft District Plan (Regulation 19) was published in January 2024 and is anticipated to be adopted in late 2024. The emerging Plan seeks to allocate a site for 2,000 new homes and associated development at Crabett Park, to the east of Crawley. If found sound, it is highly likely that some of the future residents will work at Gatwick, as outlined by the Applicant in (APP – 201). How will the Surface Access arrangements be kept sufficiently agile to cater for changes to settlement patterns and be integrated with any new additional bus services delivered as a direct result of the District Plan planned growth?

Traffic and Transport: Surface Access Commitments: Train Services

- 3.16 The London to Brighton Mainline runs through Mid Sussex with stations at Balcombe, Haywards Heath, Wivlesfield, Burgess Hill and Hassocks. Burgess Hill is a significant growth area which will see delivery of 5,000 new homes, including 3,500 at Brookleigh to the north of the town (delivered by Homes England). In addition, the Submission Draft District Plan (Jan 2024) seeks to allocate a further 1,200 homes on the west of Burgess Hill. As stated in the Applicant's own evidence (APP – 201), it is relying on an increased population arising from current planned growth and delivery

against the Standard Method going forward. It is not unreasonable to assume that some of the 243 additional direct jobs that will be filled by Mid Sussex residents will come from this growth area and therefore increase demand on the railway network.

- 3.17 It is understood that Network Rail are currently considering the implications of the Project on the rail network, and are reviewing the transport modelling undertaken by the Applicant. As a result of this Network Rail may seek contributions towards further rail investment, to manage the effect of the project on the rail network and to support mode shift. Mid Sussex is supportive of this further work to ensure impacts on the rail network are mitigated.

Parking

- 3.18 Due to its proximity to Gatwick, parts of Mid Sussex experience unauthorised off-airport parking both on-street and off-street. Each year Crawley Borough Council coordinates a survey of off-airport parking provision, looking at both authorised and unauthorised provision in Crawley, Reigate and Banstead, Mid Sussex, Mole Valley and Tandridge local authority areas. The most recent survey was undertaken in September 2023. The survey showed that there were 1,511 vehicles parked in unauthorised spaces across 5 sites within Mid Sussex. Two of these sites are wholly unauthorised and 3 had a greater number of parked vehicles than permitted under planning permission conditions. Mid Sussex had the highest level of unauthorised parking across the survey area (1,397 in Crawley and 322 in Horsham). There is also a problem of on-street parking in residential areas close to the airport, which is more difficult to monitor and enforce, but does cause a nuisance to local residents.
- 3.19 One of the unintended consequences of seeking to constrain the availability of onsite parking to achieve a shift to sustainable modes is that it may result in an increase in unauthorised off-airport parking. This Council considers this is an issue the Applicant will need to mitigate.
- 3.20 The enforcement of unauthorised parking is a drain on Council resources, both in terms of time and professional expertise in taking action against breaches in planning control. It is estimated that 20% of a full-time Senior Enforcement Officer's time is spent investigating and enforcing unauthorised off-airport parking. Mid Sussex welcomes the provision in the draft legal agreement for contributions to provide off-airport parking support but the contribution should, as a minimum, meet the cost of a full-time Principal Enforcement Officer to be shared across the joint local authorities.

Socio-Economic Impacts

- 3.21 Chapter 21 of the West Sussex Authorities Local Impact Report explains the joint Authorities' concerns about the impact the Project will have on affordable housing and private sector rented housing. Whilst it is acknowledged that growth planned through adopted Local Plans will provide sufficient population to support additional jobs created by the Project, it will put pressure on some housing sectors, particularly the private rented sector and affordable housing.

Private rented Sector – temporary accommodation

- 3.22 The Applicant's evidence shows (APP-201) that there will be 6 non-home-based workers requiring some form of temporary accommodation in Mid Sussex during the construction phase. The neighbouring authorities of Crawley will have 115 and Reigate and Banstead will have 110. The Applicant's evidence appears to demonstrate that the need in Mid Sussex is very small. The Council is concerned that if the need cannot be met in Crawley and Reigate and Banstead, it will be pushed into Mid Sussex. Local Plan evidence demonstrates that Mid Sussex is in the same Housing Market area as Crawley (and Horsham), therefore it is logical to conclude that if housing need cannot be met at Crawley, the burden will fall to Mid Sussex (and Horsham), on the basis that temporary workers will want to be based as close to the Project site as practically possible. The Crawley Local Plan clearly

demonstrates it cannot meet its own housing need and has recently declared a 'Housing Emergency' due to the huge pressure on and costs of temporary accommodation in the borough. The adopted Local Plans for Horsham and Mid Sussex make provision to deliver the unmet need of Crawley (which was 1,400 dwellings in the 2018 Mid Sussex District Plan).

- 3.23 The acute pressures on temporary accommodation at and around Crawley are set out in the LIR. Mid Sussex wants to ensure that the Applicant mitigates any additional pressure that the project places on the private rented housing sector. In the first instance the Applicant's evidence suggests there will be direct impacts within Crawley but given the most recent evidence on housing pressures, there will be impacts for Mid Sussex. The Applicant must ensure there is sufficient provision to enable these consequential impacts in Mid Sussex to be mitigated.

Affordable Housing

- 3.24 The Applicant provides an analysis of the impact of the Project on affordable housing in (APP-201). The Applicant's evidence is that the jobs created will generate a future tenure mix of 14% private rented and 17% social rented in the Gatwick adjacent authorities (Crawley, Horsham, Mid Sussex, Mole Valley Reigate and Banstead and Tandridge). Table 7.3.3 shows that the project will increase the pressure on the social rented sector above what the demand would be in the baseline. The Applicant goes on to refer to evidence that has been prepared to support Local Plan reviews. Tables 7.4.2. and 7.4.2 state that Crawley has an affordable housing need of 75%, Horsham 36% and Mid Sussex 43% as a percentage of the total housing need.
- 3.25 The Applicant argues that the additional need generated by the project is less than the need generated by Local Plan growth. APP 201 at paragraph 7.4.21 states: "This review of local plan affordable housing policies illustrates policies for affordable housing which are in place within the adjacent authorities already expect a level of affordable housing which exceeds that in the existing stock. The level of affordable housing need (as a proportion of overall need) which might be associated with the Project does not exceed the amount of affordable housing need which authorities expect to be delivered under policies in adopted or emerging plans."
- 3.26 APP 201 at paragraph 7.4.24 states: "Strategic sites in North West Sussex are meeting affordable housing provision within the existing stock or recent delivery, and indeed the potential project needs." This does not reflect the actual position regarding affordable housing delivery in Mid Sussex.
- 3.27 A comparison of the information in table 7.4.3, which sets out an affordable need in Mid Sussex of 43%, against the conclusions in paragraph 7.4.23, which shows delivery of 30% affordable housing on strategic sites in Mid Sussex, indicates a gap between need and delivery of 13%.
- 3.28 Mid Sussex Local Plan policies seek delivery of 30% affordable housing on sites that meet the threshold. This is less than the percentage of total need in the District as viability assessment indicates that a policy requirement of more than 30% affordable housing would not be viable for developers. In addition, the policy requirement of 30% does not apply to all the housing delivered in Mid Sussex. Some sites do not meet the threshold to require on-site affordable housing and other residential development permitted under permitted development rules are not required to make contributions to affordable housing. This is not taken into account in the Applicant's analysis of current and future affordable housing. The Applicant's own evidence at APP – 201, table 7.4.1 also demonstrates this point.
- 3.29 In addition, due to the data in table 7.3.3 only being presented at the 'Gatwick adjacent authorities' and 'Study Area' levels, there is a failure to take into account the varied affordable housing needs and local plan policies at the local authority level (as set out in APP – 201 at paragraphs 7.4.4 –

7.4.29). This masks very locally specific pressures within the North West Sussex HMA in which the Project is located.

- 3.30 The Mid Sussex Housing and Economic Development Needs Assessment provides the justification for seeking the provision of affordable housing on residential development. The Update Report¹ indicates that 44.2% of newly forming households in Mid Sussex cannot afford to rent or buy on the open market. High house prices, over 13 times median salary, mean that it is difficult for people to buy their own home.
- 3.31 The Strategic Housing Market Assessment (2021)² prepared to support the emerging District Plan Review 2021 - 2039 states that 470 affordable homes are needed per year to meet the need. This compares to delivery of 369, 349, 245, 214 affordable homes delivered between 22/23 - 2019/20. Whilst future delivery of affordable housing is likely to increase in line with the increase in the total housing requirement in the emerging Mid Sussex District Plan, the delivery of 470 affordable homes a year will require a significant step change.
- 3.32 It is therefore clear that the project will place additional pressure on affordable housing due to the types of jobs that the project will generate and the correlated demands on the type of accommodation workers in those sectors will require, as evidenced in (APP-201). It follows that workers in the lower paid jobs, i.e. those likely to generate social housing need, will want to be located nearer the airport to reduce the financial pressures of travel costs. Mid Sussex is concerned that this will put additional pressure on the demand for affordable housing in Mid Sussex, and the North West Sussex Housing Market area as a whole.
- 3.33 The LIR explains in greater detail the housing pressures in the North West Sussex Housing Market Area. The Applicant acknowledges that the project will generate an affordable housing need. However, there is a lack of consideration of the additional pressure the Project will place in a situation where current demand cannot already be met in full, thereby exacerbating the existing situation. Mid Sussex wants to ensure that the Applicant mitigates any additional pressure that the project places on the need for affordable housing through the provision of a Housing Fund.

4.0 Conclusion

- 4.1 Mid Sussex has significant concerns regarding the Applicant's assessment of the need for the Project and the social, environmental and economic impacts that it will have. The West Sussex LIR provides further detail of the major adverse impacts on noise and air quality, greenhouse gas emissions, highways and surface access.
- 4.2 Mid Sussex is not yet satisfied that there is sufficient mitigation proposed to address the impacts on the character of the AONB (from noise), off-airport parking (unauthorised), and the provision of affordable housing and temporary accommodation in the private rented sector. Insufficient investment is currently proposed in public transport in Mid Sussex to provide residents with alternatives to the car when travelling to the airport for work or pleasure.

¹ [hednaupdate-november2015-final.pdf \(midsussex.gov.uk\)](#) page 25, paragraph 6.10.

² [Strategic Housing Market Assessment - Final Report \(midsussex.gov.uk\)](#)