



Horsham  
District  
Council

# Written Representation of Horsham District Council

## Gatwick Airport Northern Runway Project

*Planning Inspectorate's Reference: TR020005*

*Interested Party Unique Reference: 20044739*

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# 1. Written Representation Introduction

## 1.1. Introduction

- 1.1.1. This Written Representation is made by Horsham District Council (“the Council”) in respect of the application made by Gatwick Airport Ltd (“the Applicant”) for a Development Consent Order (DCO) for the Northern Runway Project (“the Project”). The Council is a neighbouring authority as classified by the Planning Act 2008 although the Airport is adjacent to the District’s northern boundary. The Council is separately submitting a Local Impact Report (“LIR”) in the form of a joint document with the two ‘Host’ authorities, Crawley Borough Council (“CBC”) and West Sussex County Council (“WSCC”) and another neighbouring authority Mid Sussex District Council (“MSDC”).
- 1.1.2. The Council’s assessment of the impacts of the Project on the District are presented in detail in the Joint LIR, however this Written Representation, produced with regard to PINS Advice Note 2: The Role of Local Authorities in the Development Consent Process, is intended to provide a summary of the Council’s position in relation to the key issues.
- 1.1.3. This written representation is intended to be read alongside the Relevant Representation (“RR”) and Principal Areas of Disagreement Summary Statement (“PADSS”) already submitted by the Council in October 2023, the Local Impact Report and the draft Statement of Common Ground (“SoCG”).
- 1.1.4. HDC has engaged in a significant period of pre-application engagement with the Applicant and continues to do so in the form of Topic Working Groups, progression of the SoCG and the Section 106 agreement as the examination period progresses.

## 1.2. Horsham District Council’s Position on the Project

- 1.2.1. The Council recognises the significant contribution the Airport makes to the local economy and the Gatwick Diamond Area. Horsham District Council is very concerned that expansion of the Airport will negatively impact Horsham District and the Council’s agreed position is to oppose additional runway capacity. The Council carried a Notice of Motion on 11 October 2023 to re-confirm its long-standing position on this issue in the light of the expansion proposals. The motion highlighted concerns that expansion will be damaging to the environment, including impacts on noise, pollution and biodiversity as well as to the Council’s climate and carbon reduction aims and that the Council does not believe the existing infrastructure, particularly road and rail, is adequate for the Airport’s needs.

## 1.3. Water Neutrality

- 1.3.1. A Position Statement, issued by Natural England in September 2021, indicated that water abstraction for drinking supplies was impacting wildlife sites in the Arun Valley. As a consequence, all new development across the Sussex North Water Supply Zone, which includes Horsham District, is required to be water neutral. The recent *CG Fry v SoS and Somerset Council High Court judgment* (June 2023) means that many consented applications with matters reserved by condition are now also subject to water neutrality requirements. The effect of water neutrality has been to limit the amount of development that will come forward in the short term, although this is expected to recover in the mid to longer term. The rate at which development of new homes and other infrastructure is delivered will depend on the implementation of an off-setting scheme (which the Council is currently developing in partnership with other affected LPAs). This is important context in any consideration the Project’s likely impacts on the future of the region.

## **1.4. Noise Assessment**

- 1.4.1. In the LIR the Council has provided detail of the issues relating to noise and the concerns with the assessment criteria, the consideration of impacts on health and wellbeing, and it has proposed mitigation the Applicant should be seeking to deliver.
- 1.4.2. The Council's view is that locally set thresholds, which take account of the unique set of issues presented by the range of noise and vibration disturbances, and the knowledge about the implications for health and wellbeing, are justified in order to mitigation impacts of the Project.

## **1.5. WIZAD and Airspace Change**

- 1.5.1. The Council considers that controls on the WIZAD Standard Instrument Departure ("S.I.D") route are required to protect the residents of Horsham District. Given the Applicant's assertion that there will be no airspace change required to deliver the airspace capacity stated to result from the Project the Council seek to secure the certainty around aircraft noise the S.I.Ds are intended to provide. Notwithstanding this, there are concerns about the implications for increase congestion resulting from the Project on the outcome of the FASI-South initiative and locking in use of WIZAD in future.

## **1.6. Climate Change**

- 1.6.1. In June 2023 the Council declared a Climate and Ecological Emergency for Horsham District and committed to drive forward action to address this, by achieving carbon neutrality and helping wildlife to thrive.
- 1.6.2. Horsham District Council's Climate Action Strategy was published in January 2024 and prioritises specific actions to make large carbon savings across five categories; Buildings, Energy, Land Use, Transport and Waste. Key enablers include using planning and planning policy to ensure development is both sustainable and low carbon to help achieve carbon neutrality, and education and behaviour change amongst residents and businesses. This is a key consideration for decisions made by the Council, recognising the significant, long-lasting and often irreversible impacts of projects and development.
- 1.6.3. The Council fully supports the concerns raised in the LIR and does not seek to repeat them in this written representation, however it wishes to raise significant concerns about the effect the Project would have on HDC's ability to perform on its Climate policies. This relates not just to aviation policy generally, but also to the lack of meaningful and ambitious targets the Applicant has presented in respect of improving, facilitating and encouraging uptake of sustainable and active travel modes in accessing the airport both directly and indirectly.
- 1.6.4. The Council is concerned with the Applicant's failure to account for well-to-tank (WTT) emissions and considers it essential that the total emissions figure arising over the life of the scheme is calculated by the Applicant and reported accurately. In addition, we note the Applicant under-reporting aviation emissions by around 20%, which would result in 1,106,530tCO<sub>2</sub>e not being accounted for in 2028 alone during the most carbon-intensive year, where 5.327 MtCO<sub>2</sub>e was estimated to be released which has to be of further concern.

## **1.7. Transport**

- 1.7.1. The Council supports the comments made by the highways authority to date. HDC has expressed concern in the RR and PADSS submissions about the potential impacts of the Project on the transport network in Horsham District in particularly rural roads in the north which are often subject to "rat running".
- 1.7.2. The Council also considers there is an opportunity for the Applicant to work with the Council to deliver a number of enhancements to the local transport network in the District. These include

infrastructure changes to allow bus prioritisation and segregation to allow for time savings when using bus services to access the airport and, more specifically, support for the delivery of a multi-modal transport corridor outlined in the West Sussex Transport Plan, which would benefit those accessing the airport, and assist the Applicant in meeting mode share targets. .

## **1.8. Air Pollution**

- 1.8.1. The Council fully supports the concerns raised in the LIR and does not seek to repeat them in this written representation, however it wishes to raise significant concerns about the effect the increased air pollution burden on both the existing residents of Rusper parish, and future residents of the proposed West of Ifield housing development.

## **2. Conclusion**

- 2.1.1. The Council has a number of significant concerns over the approach of the applicant to engagement and consultation to date, as well as the adequacy of baseline data and assessments which underpin the Project's evidence base. There is lack of progression and clarity in terms of how the Applicant will mitigate the impacts of the Proposal, particularly around the support and funding that will be provided to local authorities in respect of monitoring and enforcing requirements and obligations.
- 2.1.2. At this stage, there is still a need for the Applicant to engage meaningfully and openly with stakeholders to ensure changes, mitigation and controls can be agreed in order to ensure that, if approval is granted, social, environmental and economic impacts can be managed in a way that ensures benefits can be shared between the airport and communities.