



Horsham  
District  
Council



# **GATWICK AIRPORT NORTHERN RUNWAY PROJECT**

Planning Inspectorate's Reference: TR020005

## **Legal Partnership Authorities**

### **Comments on The Applicant's Response To The ExA's Written Questions (ExQ1)**

#### **Response to [\[REP3-095\]](#) | Historic Environment**

**DEADLINE 4: 15 May 2024**

Crawley Borough Council (GATW-AFP107)

Horsham District Council (20044739)

Mid Sussex District Council (20044737)

West Sussex County Council (20044715)

Reigate and Banstead Borough Council (20044474)

Surrey County Council (20044665)

East Sussex County Council (20044514)

Tandridge District Council (GATW-S57419)

## Legal Partnership Authorities' Comments on the Applicant's Responses To The ExA's Written Questions (ExQ1)

### Response to [\[REP3-095\]](#) | Historic Environment

The Legal Partnership Authorities are comprised of the following host and neighbouring Authorities who are jointly represented by Michael Bedford KC and Sharpe Pritchard LLP for the purposes of the Examination:

- Crawley Borough Council
- Horsham District Council
- Mid Sussex District Council
- West Sussex County Council
- Reigate and Banstead Borough Council
- Surrey County Council
- East Sussex County Council; and
- Tandridge District Council.

In these submissions, the Legal Partnership Authorities may be referred to as the “*Legal Partnership Authorities*”, the “*Authorities*”, the “*Joint Local Authorities (“JLAs”)*” or the “*Councils*”. Please note that Mole Valley District Council are also part of the Legal Partnership Authorities for some parts of the Examination (namely, those aspects relating to legal agreements entered into between the Applicant and any of the Legal Partnership Authorities).

#### **Introduction**

1. The Legal Partnership Authorities have now had the opportunity to review the Applicant's responses to ExQ1 in conjunction with their specialist consultants and legal advisors.
2. The Applicant provided their response to ExQ1 in the form of 19 separate written submissions to the examination together with annexes. For the ExA's ease of review, the Legal Partnership Authorities set out their comments on the Applicants responses in the final column of the table below.
3. Where the Legal Partnership Authorities have decided not to comment on one of the Applicant's responses, this question has been deleted from the table below.
4. For the avoidance of doubt, where the Legal Partnership Authorities have decided not to comment on one of the Applicant's responses this should not be taken to indicate that the Legal Partnership Authorities agree with the response.

ExQ1	Question to:	Question and Applicant's Response	Legal Partnership Authorities' Response
<b>HISTORIC ENVIRONMENT</b>			
HE.1.1	The Applicant	<p><b>Archaeology</b></p> <p>Various specific and detailed concerns are raised with regard to archaeology in the vicinity of the Proposed Development by local authorities, requesting extensive changes to the Written Scheme of Investigation (WSI) <a href="#">[REP1-068]</a>, <a href="#">[REP1-097]</a>.</p> <p>Provide a response to these comments and a revised WSI where necessary.</p>	<p><b>West Sussex WSI</b></p> <p>Place Services (on behalf of Crawley Borough Council and West Sussex County Council) have provided a breakdown of their recommendations to GAL's archaeological consultants and would welcome a meeting to discuss the limited further work that has been proposed to date on the specific areas already identified that needs work. The updated Written Scheme of Investigation submitted at deadline 2 (REP2-020) included additional work proposed on the redesign of the Works are 43 (the reedbeds) which was agreed by ourselves as appropriate, however, none of our other concerns were addressed within the document.</p> <p>The level of work on the remainder of the site cannot be defined until the report on the present airport's development has been submitted. Place Services, as well as earlier Local Authority advisors, have requested a report on the development of the present airfield and its associated groundworks for a number of years. It is only once this document has been submitted and assessed that a final programme of investigation can be determined. This document should also help define the final requirements within the WSI.</p> <p>Although the applicant has said that they have made changes to their WSI none of those recommended by West Sussex or Crawley are addressed. This is a serious concern as it is hoped this document can be agreed before the end of the examination.</p> <p>We are supportive of a meeting as soon as possible, as we are keen to establish the full requirements of the archaeological programme.</p>
		<p>The detailed responses to the local authorities concerns are contained within document <b>The Applicant's Response to Local Impact Reports</b> (Doc Ref. 10.15) at Section 3.5. Below is a summary of the issues as raised and the Applicant's response to them.</p> <p><b>Surrey WSI</b></p> <p>The Applicant has responded to the request to update the feature sampling strategy within the Surrey WSI with the latest Surrey guidance ('Surrey County Council Historic Environment Planning, 2023. General Standards for Archaeological Projects in Surrey'). The revised Surrey WSI was submitted at Deadline</p>	

		<p>2 <a href="#">[REP2-018]</a>.</p> <p><b>West Sussex WSI</b></p> <p>This was updated and submitted at Deadline 2 to reflect Project Change 3 <a href="#">[REP2-019]</a>. The LPAs have asked that there should be proposed changes to enlarge the excavation areas at Museum Field and at Brook Farm (WSI Area H). GAL does not consider this necessary, however, wishes to discuss this with the LPAs specialist advisors (Place Services) to better understand their views. If there are further changes required to the WSI as a result, these will be confirmed at Deadline 5. Additionally, we are proposing to submit a report to the Local Planning Authorities which sets out a detailed history of the airport and information regarding past ground disturbance. Once that report has been provided and a meeting to discuss held with the appropriate advisors to the LPAs (Place Services), the final position will be consolidated in the finalised WSI.</p>	
<p>HE.1.2</p>	<p>The Applicant</p>	<p><b>Charlwood House</b></p> <p>a) Provide further details for any proposed mitigation to the setting of Charlwood House. Is the vegetation identified present all year round? Are controls required in terms of tree retention?</p> <p>b) Provide indicative design details for</p>	<p><b><u>Response to (a)</u></b></p> <p>The Applicant’s response to sub-question (a) is not considered adequate. What has been confirmed is that a 24m section of tree and hedgerow is to be removed to widen the existing closed gated entrance to the car park which is located approximately 30 metres to the east of the junction with Poles Lane.</p> <p>The surrounding tree screening is deciduous and views of this property can be glimpsed from public views along Lowfield Heath Road and from within the airfield particularly in the winter months.</p>

		<p>structures at the proposed Car Park X, including an assessment of light spill on the setting of the heritage asset.</p>	<p>While the Applicant states the decked car park is to the east of Works Area 31, the parameter plan shows a maximum height of development of 11 metres extending westwards beyond the new widened site access to within approximately 30m of the junction Poles Lane (the scale bar on the works plan map does not appear to be correct). This parameter drawing GA9000108 Rev P01 [AS-131] is currently proposed to be approved and is the only plan showing the extent of built form therefore the concerns about visual impact remain. The height of any works for the drainage features or lighting or fencing for the remaining western part of the site is also not specified. This extent of built form on the eastern portion of the works site is also shown on Figure 1.1.1 in the OLEMP [REP3-031]. The revised design and access principles listed as DBF9 [REP3 -056] comprising of 3 loosely worded statements which do not provide the control over the positioning of the deck park in relation to the listed building. Limiting tree and hedgerow removal where possible is welcomed but is still too loosely worded and while a commitment to replanting along the southern boundary is supported this does not go far enough as the Authorities wish to see the effective screening for the car park from not just the listed building but visual impact of the development (including any light spill) from the wider countryside to the south.</p> <p>The tree removal plan for the Car Park X Appendix 8.10.1 Sheet 12 of 13 [REP3-041] is confusing to understand as the key does not assist in identifying clearly which of the trees surveyed are being removed. The extent of tree loss along the southern boundary to form the widened access is unclear as this does not appear to correspond with the current access. The Authorities would like a clear survey drawing for this site showing individual trees (not broad groups) and clearly identifying which ones would be removed. The current drawing is not on an Ordnance Survey base and therefore the site relationship with surrounding features such as Charlwood House cannot be readily established.</p> <p>While it is noted that references to new and replacement planting for Car Park X has been included as a specific reference in the OLEMP para 3.2.3 [REP3-031] the wording is still not considered to adequately address the</p>
		<p>(a) The ES has assessed the setting effects to Charlwood House and has concluded that Car Park X would not be visible owing to intervening vegetation (see paragraphs 7.9.39 to 40 of <b>ES Chapter 7: Historic Environment</b> [APP-032]). The proposed area of decked parking is in the eastern portion of the area for car parking. There will be limited tree and hedgerow removal of approximately 24m to widen the entrance to Car Park X however there will be replanting with native hedgerow and trees which will mature to screen views. Otherwise, trees on the boundary of existing Car Park X and at Charlwood House will not be removed by the proposed development. These aspects to be reflected in the design of Car Park X are secured through the <b>oLEMP</b> (Doc Ref. 5.3 v3) and the <b>Design Principles</b> (Doc Ref. 7.3 v2). <b>ES Chapter 8 Landscape, Townscape and Visual Resources</b> [APP-033] has assessed the effects at Bridleway 348Sy, Poles Lane, 80m to the east of Charlwood House, as negligible adverse during in all assessment years (see paragraphs 8.9.78, 8.9.162, 8.9.258). Lying between the bridleway and the listed building, is a further block of mature trees. Overall, although the trees are deciduous the vegetation is sufficiently layered and wooded between the Car Park and Charlwood House so that no intervisibility exists in winter conditions and there are no changes which would affect the setting of the building during</p>	

	<p>daytime or at night. The new design principle for Car Park X is set out in the Design Principles DBF.9 In order to limit visibility to Charlwood House, the design of Car Park X (Work No. 31) will:</p> <ul style="list-style-type: none"> <li>• Locate the decked parking provision in the eastern portion of the Works Area.</li> <li>• Limit tree and hedgerow removal where possible, other than as required to widen the vehicular entrance to Car Park X;</li> <li>• Provide re-planting provisions along the southern boundary to further screen views.</li> </ul> <p>Activities and mitigation measures which will take place during the pre-commencement and construction period of the Project are defined within <b>ES Appendix 5.3.2: Code of Construction Practice (CoCP)</b> [REP1-021]. <b>Annex 6</b> of the CoCP [REP1-023, REP1-024, REP1-025] includes an <b>Outline Arboricultural Method Statement</b> which identifies measures to protect retained trees and root protection zones.</p> <p>(b) The indicative designs for Car Park X are within the <b>Design &amp; Access Statement - Volume 2</b> [REP2-033] at section 5.2.4 on Car Park X Deck Parking and Flood Storage Area. This shows the decked parking in the eastern portion of the area for car parking.</p> <p>Measures to control lighting are described in the <b>Design &amp;</b></p>	<p>concerns about this sensitive boundary. Any planting to be effective needs adequate space to grow and establish and appropriate mix of species to provide year-round screening. Consideration of landscape opportunities is not sufficient. While the built form of the car park may be to east of listed building the surface car park will extend directly to the north of this building including any lighting. The existing screen should be supplemented to be effective year round screening to the countryside to the south.</p> <p><b><u>Response to (b)</u></b></p> <p>The Authorities do not consider that the Applicant has adequately answered this question. Having reviewed the revised Design and Access Statement volume 2 [REP2-033] there were no changes in the illustrative material to address this point or in volume 5 [REP2-036] or the Operational Lighting Framework [APP-077]. Lighting Principle LA8 as quoted is also unchanged from the original submission. The Authorities concerns remain as set out in the West Sussex LIR [REP1-068] summarised in table 7.1 (7.1B).</p>
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<p>HE.1.3</p>	<p>The Applicant</p>	<p><b>Charlwood Park Farmhouse</b></p> <p><b>a) Provide further design details for structures (lighting etc) at the proposed North Terminal Long Stay Decked Car Park, including an assessment of how they may affect the setting of Charlwood Park Farmhouse.</b></p> <p><b>b) Why are nurseries not considered to be noise sensitive uses [APP-032]? The ExA notes that the current operators of the nursery have no concerns. However, ownership and uses of buildings change over time.</b></p> <hr/> <p>(a) <b>ES Chapter 7: Historic Environment</b> [APP-032] (paragraph 7.9.80) has assessed the effects to Charlwood Park Farmhouse and has concluded that no part of the decked car park would be visible in views from and across Charlwood</p>	<p>a) The Applicant has not provided this information as the revised Design and Access Statement volume 3 cited by the Applicant does not address this question. The concerns expressed in the West Sussex LIR Chapter 7 [REP1-068] remain. The updated Design Principles Document [REP3-056] provides no additional information or design controls.</p>



		<p>Park Farmhouse, therefore the magnitude of impact would be no change. The indicative design information for the Car Park is contained within the <b>Design &amp; Access Statement - Volume 3</b> <a href="#">[REP2-034]</a> at section 5.6.7 and Figure 24.</p> <p>As stated in response to HE1.2 above, the <b>Design Principles</b> (Doc Ref. 7.3 v2) provides site-wide design principles for car parks including landscaping and built form related design principles. The <b>Design Principles</b> are secured by Requirement 4 of the <b>dDCO</b> (Doc Ref. 2.1 v6).</p> <p>(b) The Bear and Bunny Nursery is a longstanding occupier of the building which is owned by GAL. <b>ES Chapter 14: Noise and Vibration</b> <a href="#">[APP-039]</a> considers buildings in use as nurseries as being potentially highly sensitive and assessment is undertaken on a case by case basis. During preparation of the ES, a site visit was undertaken to the Bear &amp; Bunny Nursery (occupiers of Charlwood Park Farmhouse) and a discussion held with the managers of it. The ES assessment concluded that there would be negligible adverse effects at this receptor (see paragraphs 14.4.86, 14.9.20 and 14.9.224 of <b>ES Chapter 14: Noise and Vibration</b> <a href="#">[APP-039]</a>).</p> <p>Separately in ExQ1 NV.1.19, the ExA has asked why nurseries are not included in the Noise Insulation Scheme for schools. The Applicant has subsequently agreed to include them because some can be noise sensitive and they will be considered for insulation. The Applicant's Response to</p>	
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		NV.1.19 is included in Doc Ref. 10.16.	
HE.1.7	The Applicant	<p><b>Noise Insulation Grant Scheme</b></p> <p>a) How does the Applicant’s current sound insulation scheme apply to listed buildings?</p> <p>b) Are there further allowances provided given that it is more difficult/ restrictive to provide insulation to historic buildings?</p> <p>c) What changes, if any, are proposed as part of the Proposed Development?</p>	<p>a) The Authorities note that elsewhere the Applicant has stated that the scheme applies to other premises which are in non-residential use which may be listed properties (see HE1.3)</p> <p>b) The Authorities wish to highlight that any noise mitigation for listed buildings such as Charlwood House and Charlwood Park Farmhouse will require bespoke design solutions and therefore the Applicant should build into the wording of the noise insulation scheme additional flexibility to allow the most appropriate acoustic design solution to be implemented to preserve the unique character of the heritage asset. It should be recognised that there may need to be flexibility on the budget for such buildings. The Applicant should ensure that any listed property owner is reimbursed in full for any costs incurred for pre-application heritage advice or planning permission that may need to be sought in order for any insulation scheme to be implemented. It is also recommended that this scheme be publicised prior to the commencement of works so mitigation can be in place before noisy works commence and given the lead in times for any extra listed building consents and planning permission that may be required from the Local Planning Authorities. The Authorities would like to see the above points included in an updated Noise Insulation Scheme Update Note [REP2-031].</p>
		<p>(a) The current Noise Insulation Scheme applies to all residential buildings including those that are listed.</p> <p>(b) The current Noise Insulation Scheme makes no further provisions for listed buildings</p> <p>(c) The proposed Noise Insulation Scheme (ES Appendix 14.9.10 [APP-180], increases the sums of money available across new zones. Under the proposed NIS, the Applicant will write to homeowners and work with the owner to develop a suitable package of acoustic insulation to suit their needs and to satisfy the local</p>	

		<p>authority conservation officer that the proposals can receive Listed Building Consent where this is necessary. Energy Efficiency and Historic Buildings, Secondary Glazing for Windows, Historic England, 2016<sup>1</sup> gives guidance on forms of secondary glazing best suited to Listed Buildings (Figures 6 to 16 give photographs of secondary glazing), and the Applicant will employ a specialist secondary glazing contractor to develop sympathetic and appropriate designs in each case. Experience shows that secondary glazing, mounted so as to not affect the external glazing, and acoustic ventilators suitably designed for Listed buildings are generally consented. In the Outer Zone, there are 137 listed dwellings. Where acoustic insulation and/or acoustic ventilators are required, the Applicant commits to manage the Listed Building applications, thus reducing costs to the home owner. This is noted as follows in <b>ES Appendix 14.9.10 Noise Insulation Scheme Update Note [REP2-031]</b> submitted at Deadline 2:</p> <p>5.1.2 In the case of listed buildings, or for buildings within conservation areas, the property owner and/or occupier should contact the local council to establish if planning permission or listed building consent is required. Where planning permission or listed building consent is required, the owner should advise GAL and GAL's contractors will survey the property and submit the necessary application for the required consents following any requirements of the local conservation officer and Historic England's guidance Energy Efficiency and Historic Buildings, Secondary Glazing for Windows, 2016.</p>	
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<sup>1</sup> <https://historicengland.org.uk/images-books/publications/eehb-secondary-glazing-windows/#:~:text=Secondary%20glazing%20when%20carefully%20designed,the%20installation%20is%20easily%20reversible.>

<p>HE.1.9</p>	<p>The Applicant Historic England</p>	<p><b>Air Noise and the Setting of Heritage Assets</b></p> <p><b>Provide further information on the issue of air noise and tranquility with regard to the way in which the settings of designated heritage assets are experienced (referred to as the Temple Methodology by Historic England [REP1-073]).</b></p>	<p>The West Sussex Joint Local Impact Report <a href="#">[REP1-068]</a> sets out the Authorities' concerns over the impact that increased overflight of the High Weald AONB, due to increased use of Route 9, will have on the tranquility of the protected landscape.</p> <p>In its response, the Applicant references the increased overflight at Wakehurst Place Royal Botanic Gardens, Historic Park and Garden and Grade 1 listed building. Whilst the 'dot' indicating the site falls within the '11 - 50' contour, the wider parks and gardens fall to the south, the most tranquil parts, and are within the 51 – 100 in 2032 contours <a href="#">[REP2-007]</a> (Figure 8.6.7). Therefore, the figures in <a href="#">[APP-033]</a> table 8.9.1 do not accurately reflect the impacts of increased overflight at this location and the magnitude of the impacts have been understated. 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. <b>AHe</b></p>
		<p>As discussed within in the answer to question HE1.6 above, the ES applies the English Heritage Aviation Noise Metric methodology to scope in historic assets for assessment. The development of this methodology considered tranquility inherently, and how a change in aircraft noise could affect the significance of heritage assets. It reviewed available research and CPRE tranquility mapping correlated with Gatwick's Noise Insulation Scheme, noise contours and flight tracks and noise contours from Heathrow.</p> <p>Section 5.4 of <b>ES Appendix 7.6.1: Historic Environment Baseline Report</b> <a href="#">[APP-101]</a> explains the application of the methodology in accordance with EIA principles to establish the significance of change brought by the development. The Applicant has applied the methodology conservatively by using the entire area where there will be a predicted change of 1 decibel (dB) or more in the average summer daytime (Leq 16 hr) noise level (see Figure 7.6.6 of <b>ES Historic Environment Figures</b> <a href="#">[APP-054]</a>). The next stage in the methodology is to identify those heritage assets within the</p>	

		<p>noise change footprints that can be classed as ‘noise-sensitive’. Four broad categories are considered:</p> <p>(A) When solitude, embedded with quietness, is intrinsic to understanding the form, function, design intentions and rationale for the siting of a heritage asset;</p> <p>(B) When a non-quiet and specific existing soundscape forms part of the functional understanding of the heritage asset;</p> <p>(C) When the abandonment of a heritage asset; a monument, building or landscape, in antiquity (or more recently) has created a perceived otherworldly romanticism enabled by the absence of anthropogenic sounds (quietness); and</p> <p>(D) When the absence of foreign (modern) sounds allow an asset to be experienced at a very specific point in time that is intrinsic to understanding the asset’s significance.</p> <p>The methodology identified three heritage assets within categories A and B which would suffer a deterioration in noise environment (“negative change”) and two category A assets for which there would be an improvement (“positive change”) as a result of the Project (see ES Chapter 7 Historic Environment [APP-032] paragraphs 7.6.42 and 7.9.117 to 7.9.124). The ES records the individual assessments of potential impacts on the significance of these assets resulting from the change in air noise taking into existing baseline</p>	
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		<p>conditions and the noise increase or decrease that they would experience as a result of the project.</p> <p>A wider assessment of tranquility is contained within <b>ES Chapter 8 Landscape, Townscape and Visual Resources (LTVR)</b> <a href="#">[APP-033]</a> which, in accordance with the <b>PINS Scoping Opinion</b> <a href="#">[APP-095]</a> (PINS ID 4.2.2; see ES Chapter 8, Table 8.3.1: Summary of Scoping Responses), draws on the CAA CAP1616 methodology for assessing effects to the perception of tranquility. The final assessment methodology and conclusions have been agreed with Natural England and this will be recorded in the updated Statement of Common Ground. The overall assessment is nuanced, as people’s reaction to overflying aircraft varies between individuals. Overall, however, the assessment is that magnitude of change from the Project to the level of tranquility within the High Weald, Surrey Hills and Kent Downs National Landscapes and the South Downs National Park would be negligible, leading to minor adverse effects on the perception of tranquility during the day and at night, which would not be significant. Please also see the answer to question HE1.11 below.</p>	
<p>HE.1.11</p>	<p>The Applicant</p>	<p><b>Air Noise and the Setting of Heritage Assets</b></p> <p><b>Various RRs and the LIRs from Kent County Council (KCC) [REP1-079] and Sevenoaks District Council [REP1-095] raise concerns over current and proposed effects of</b></p>	<p>The West Sussex Joint Local Impact Report <a href="#">[REP1-068]</a> sets out the Authorities concerns on this issue. In its response, the Applicant references the increased overflight at Wakehurst Place Royal Botanic Gardens, Historic Park and Garden and Grade 1 listed building. Whilst the ‘dot’ indicating the</p>

		<p><b>aircraft noise upon various designated heritage assets, including, but not limited to Chartwell Place, Penshurst Place, Chiddingston Castle, and Hever Castle. Your response in the Relevant Representation Report is noted [REP1-048]. Can you provide further information on this? How many additional aircraft are likely to pass over, or close to, these assets?</b></p>	<p>site falls within the '11 - 50' contour, the wider parks and gardens fall to the south, the most tranquil parts, and are within the 51 – 100 in 2032 contours <a href="#">[REP2-007]</a> (Figure 8.6.7). Therefore, the figures in <a href="#">[APP-033]</a> table 8.9.1 do not accurately reflect the impacts of increased overflight at this location and the magnitude of the impacts may have been understated. In addition, the '51- 100' contour in 2032, <a href="#">[REP2-007]</a> (Figure 8.6.7) moves much closer to the 'Wakehurst Place' dot, almost bringing it within this contour. As this site effectively sits on the border of two contours a finer grain assessment at this location needs to be undertaken, providing figures for Wakehurst Place (as an update to <a href="#">[APP-033]</a> table 8.9.1. This would enable a precautionary/worst case assessment to be undertaken.</p>
		<p>As discussed within in the answer to question HE1.6 and 1.9 above, the ES applies the English Heritage Aviation Noise Metric methodology to scope in historic assets for specific assessment. The use of this methodology has been agreed with Historic England. It is based on consideration of the overlap of contours of average noise levels and numbers of movements and its development considered the aviation noise effects at Gatwick and Heathrow. Gatwick has applied the methodology conservatively – this results in a contour showing which areas meet the criteria for assessment. The Hever Castle, Petworth House, Wakehurst Place and the Temple of the Winds, Blackdown assets listed above, along with Chartwell Place, Penshurst Place and Chiddingston fall outside of this contour and were therefore scoped out of the assessment.</p> <p>This notwithstanding, the assessment of effects to tranquillity is contained within <b>ES Chapter 8: Landscape, Townscape and Visual Resources (LTVR)</b> <a href="#">[APP-033]</a> which itself draws on methodologies contained within <b>ES Chapter 14: Noise and</b></p>	

		<p><b>Vibration</b> <a href="#">[APP-039]</a>. The tranquillity assessment considers overflight by aircraft in accordance with CAA methodologies (see <b>ES Appendix 14.9.2 Air Noise Modelling</b> <a href="#">[APP-172]</a>) and considering the change in the total number of daily overflights at these locations that would arise if up to approximately 20% more Gatwick flights were added to the actual number of overflights in the future baseline scenario of 2032 (this year being modelled as the year up to which air traffic numbers would increase the most).</p> <p>Gatwick Airport only overflight analysis is illustrated in <b>ES LTVR Figure 8.6.3</b> and the non-Gatwick baseline overflights are illustrated in <b>ES LTVR Figure 8.6.4</b> <a href="#">[APP-061]</a>. The combined analysis of all overflights within a wider 35 mile radius around Gatwick Airport is illustrated in <b>ES LTVR Figures 8.6.5, 8.6.6 and 8.6.7</b> <a href="#">[APP-061]</a>.</p> <p>Following consideration of the overflight analysis above, <i>Table 8.9.1: Increase in Daily Overflights at Assessment Locations</i>, of ES Chapter 8 reports how the Project would increase flights at 10 well known and popular sites, some of which are also heritage assets. These include Hever Castle, along with Petworth House, Wakehurst Place and the Temple of the Winds, Blackdown.</p>	
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