



Gatwick Airport Northern Runway Project

Appendix C: Response on Heritage

Book 1

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Table of Contents

1	Introduction	ii
2	Response to the Joint Local Authorities' Deadline 8 Submission	1
3	Response to West Sussex Joint Local Authorities' Deadline 8 Submission	3

1 Introduction

1.1.1 This document provides the Applicant's response to Historic Environment issues raised by interested parties at Deadline 8, specifically:

- The Joint Local Authorities' Deadline 8 Submission – Comments on any further information / submissions received by Deadline 7 [[REP8-126](#)].
- The West Sussex Joint Local Authorities' Deadline 8 Submission – Comments on any further information / submissions received by Deadline 7 [[REP8-134](#)].
- The Legal Partnership Authorities' Deadline 8 Submission – Comments on responses to ExQ2 [[REP8-161](#)].
- The Legal Partnership Authorities' Deadline 8 Submission – Issue Specific Hearing 9 post-hearing submission: Mitigation [[REP8-165](#)].

2 Response to the Joint Local Authorities' Deadline 8 Submission [\[REP8-126\]](#)

2.1 Introduction

2.1.1 The Joint Local Authorities' D8 submission [\[REP8-126\]](#) provides commentary on how the Applicant has assessed effects to two Grade II* Listed Buildings: Charlwood Park Farmhouse on the north west side of the airport (paragraph 15.8 in [\[REP8-126\]](#)), and Charlwood House on the southern airport boundary to the west of Poles Lane (paragraph 23.3 and Table 2 in [\[REP8-126\]](#)). Whilst the Applicant notes that for Grade II* Listed Buildings, Historic England is the principal consultee and has agreed with the Applicant's assessment that there will be no significant effects, the Applicant has acknowledged the Local Authorities' concerns raised during the Examination process and amended the **Design Principles** (contained in the DAS Appendix 1) (Doc Ref. 7.3 v7) to seek to address these comments.

2.2 Charlwood Park Farmhouse

2.2.1 The assessment for Charlwood Park Farmhouse has involved site visits to understand the setting of the building and what can be seen in views from it (including from the 1st floor rooms) and across it in the direction of the proposed decked car park. The assessment has also included review of visualisations presented as ES Figure 8.9.17 [\[APP-061\]](#) and ES Figure 8.9.109 [\[APP-062\]](#). Para. 7.9.69 of ES chapter 7 [\[APP-032\]](#) stated that 'The current setting of the Grade II* listed Charlwood Park Farmhouse makes a limited contribution to its significance. Para 7.9.81 of ES chapter 7 [\[APP-032\]](#) set out that "*No part of the decked car park would be visible in views from and across Charlwood Park Farmhouse, therefore the magnitude of impact would be no change. The significance of effect on the significance of this Grade II* listed building would be no change*". This conclusion remains unchanged.

2.2.2 The external lighting for the decked car park would not exceed the maximum height parameter established for this structure' i.e. there would not be any lighting columns on the upper deck that would extend vertically beyond the maximum height parameter. The position of the decked car park (and its associated maximum height) is specified and secured through the Parameter Plans [\[REP7-020\]](#) and article 6 of the Draft DCO [\[REP7-005\]](#).

2.2.3 In relation to the Joint Local Authorities' concerns expressed in [\[REP8-126\]](#) at paragraph 15.8 and in Table 2, it is relevant that the Applicant's Deadline 7

response [[REP7-096](#)] had confirmed that the design of external lighting for the decked car parks (including Work No. 32) is explained and controlled in Design Principle DBF51 of the **Design Principles** (Doc Ref. 7.3 v7), secured under DCO Requirement 4. This states that precise lenses, baffles and light shields will be used where necessary to restrict the potential for obstructive light to ecological sensitive areas, heritage assets and surrounding rural landscape. The assessment of impacts and effects in respect of the Grade II* listed Charlwood Park Farmhouse remains as presented within ES chapter 7 [[APP-032](#)].

2.3 Charlwood House

2.3.1 The JLAs' concern relates again to the setting of the listed building and the potential for landscape and visual impacts resulting from the construction and operation of the decked section of Car Park X. Again, the Applicant's assessment was informed by site visits and examination of appropriate visualisations. The position of the decked car park (and its associated maximum height) is specified and secured through the Parameter Plans [[REP7-020](#)] and article 6 of the **Draft DCO** [[REP7-005](#)]. Design Principle DBF45 (Doc Ref. 7.3 v7), secured under DCO Requirement 4, places specific requirements on the detailed design of Car Park X (Work No. 31) to ensure an acceptable design relationship with Charlwood House, the wider countryside, and existing tree and hedgerows along the site's boundaries. Design Principle DBF43 has also been amended following feedback from interested parties received during the Examination process to specify that additional or enhanced façade cladding on decked car parking structures will be considered at the detailed design stage [[REP7-063](#)]. The Project-wide Design Principle D1 is focused on achieving good design and ensuring that the detailed design is visually appropriate and sensitive to place, with an appearance that demonstrates good aesthetics; and is sustainable, durable, adaptable and resilient.

2.3.2 The assessment of impacts and effects in respect of the Grade II* listed Charlwood Park Farmhouse is presented within para. 7.9.40 of **ES chapter 7** [[APP-032](#)]. This sets out that '*The impact of the construction and operation of the decked car park on the significance of this asset would be no change and the consequent significance of effect would be no change*'. The Applicant considers that its assessment is robust, and that it has responded appropriately to Consultees' concerns within the nature of the DCO Application being made.

- 3 Response to West Sussex Joint Local Authorities' Deadline 8 Submission [REP8-134]**
- 3.1 Paragraph 2.2(i) of the West Sussex Joint Local Authorities' Deadline 8 Submission [REP8-134] presents a request for clarification regarding the scope of archaeological and geoarchaeological works within Car Park X.
- 3.1.1 The JLAs consider that clarity is needed with regard to the archaeological and geoarchaeological work proposed at Car Park X, specifically around the text provided in para. 6.5.2 of **ES Appendix 7.8.2: Written Scheme of Investigation for Post-consent Archaeological Investigations and Historic Building Recording – West Sussex** (Doc Ref. 5.3 v5).
- 3.1.2 The Applicant considers that this issue is adequately addressed within the WSI, including the text in the fourth bullet point of paragraph 5.1.7, the third bullet point in section 5.5, paragraph 7.1.1 and section 7.2, also the information provided in Figures 5 and 11. The text in paragraph 6.5.2 of the WSI merely provides additional information regarding actions to be taken in the event that palaeochannels or deposits of geoarchaeological potential are identified at this location. The Applicant considers that no further changes are required to the text within this WSI.
- 3.2 Paragraph 2.2(ii) of this D8 submission comprises a statement that additional archaeological work should be undertaken within Car Park H (Works No 28).
- 3.2.1 The JLAs consider that a staged programme of archaeological work should be undertaken within the area proposed for new hotel offices and multi-storey Car Park H (Works No. 28), with an initial low level of trial trenching to assess survivability of archaeological remains and then wider if there is good survival.
- 3.2.2 At Deadline 6, the Applicant submitted a report titled "*The Historical Development of Gatwick Airport including a Review of the Extent of Past Ground Disturbance*" [REP6-070]. This concluded that, while the survival of archaeological features in the location cannot be ruled out, they are likely to be truncated in terms of the removal of the upper parts of the features and fragmentary in terms of disruption from deeper disturbances such as drainage. In response to requests for clarification from WSCC's consultant, Essex Place Services the Applicant provided confidential information showing that there was a grid of buried electrical services and drainage over the entire area of the car park (by letter, 28 June 2024). The Applicant does not agree based on the available evidence that it is in any way necessary to undertake archaeological investigation in this area. The Statement of Common Ground between the Applicant and WSCC has been

amended to include this as a point of disagreement between the Applicant and WSCC.

- 3.2.3 The same two points raised in the West Sussex Joint Local Authorities' Deadline 8 Submission – Comments on any further information / submissions received by Deadline 7 [\[REP8-134\]](#) are similarly raised in the Legal Partnership Authorities' Deadline 8 Submission – Comments on responses to ExQ2 [\[REP8-161\]](#) (Q2 HE2.4) and in the Legal Partnership Authorities' Deadline 8 Submission – Issue Specific Hearing 9 post-hearing submission: Mitigation [\[REP8-165\]](#) (page 31). The Applicant's responses are provided above.