

Save West of Ifield's Regulation 19 Response¹

Policy HA2 - Allocation of Land West of Ifield

Noise from Gatwick Airport

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Summary

The overall conclusion is that the Horsham District Council (HDC) Local Plan is unsound because Strategic Policy HA2 contravene NPPF paragraphs 24, 25, 174 and 185. **There is insufficient evidence that the adverse health effects of current and future aircraft noise (HDC Policy 11) will be adequately mitigated for at the West of Ifield Strategic Site (Strategic Policy HA2). HDC policies and Homes England's EIA Scoping Request Report fail to attach sufficient priority to planning for current and future aircraft noise.**

- Noise measurement and monitoring is a complex and technical subject, as well as being very important for human health and well-being. We understand that HDC employs an aviation consultant, and presume that Homes England does the same. But to the non-expert but concerned observer, HDC and HE's lack of progress with assessing Gatwick noise, and use of an assortment of (possibly inconsistent) noise metrics and contour maps appears confused and inadequate. We would expect that as government bodies both HDC and HE would place a high priority on aircraft noise and the need to protect future residents from harm. If not then this would be to contravene NPPF paragraphs 174 and 185.
- We would go so far as to say that the Evidence base fails to present adequate information around aircraft noise, given its health and wellbeing importance to most residents in the north of the District. Residents should be convinced that Horsham Council fully understand the metrics and the issues, and the Council should want to ensure that residents are able to understand them too.
- **Gatwick Airport Ltd (GAL) is engaged in several expansion projects, but there is little evidence that HDC or HE have adequately considered the potential noise impacts of airport expansion and likely changes to flightpaths and frequency.** Aside from the long-standing ambition for an additional full runway to the South, GAL has a DCO for adding a Northern runway currently under Examination, plans increase flight frequency and to change flightpaths. These appear to have been down-played by HDC and HE, although HDC's response to Homes England's 2023 EIA Scoping Request does start to address the impact of the Northern runway project. Consideration should be given to the option of delaying progression of the Plan until the outcome of the DCO is known.
- **There is evidence of a lack of effective cooperation between HDC and CBC on issues such as noise and pollution in relation to the West of Ifield site.** It's not clear which LA is in the lead, and there is evidence that HDC has not been sufficiently engaged in discussions with Homes England in respect of specifying baseline surveys, etc. Plus, noise is not considered a strategic area for cooperation in the NW Sussex Statement of Common Ground 2020 which given the scale of Gatwick Airport and the scale of the development proposed at West of Ifield is a significant shortcoming. A lack of cooperation would contravene NPPF paragraph 24.

¹ This report has been prepared on behalf of the Save West of Ifield residents' group, by Fenella Maitland-Smith and Aidan Zeall with valuable input from Irene Wakeham, and friends at GACC and CAGNE.

- Throughout the HDC Plan Gatwick is repeatedly mentioned as an economic hub providing employment and investment opportunities. But the actual and potential downsides are not afforded sufficient weight given they affect many parishes in the District. This contravenes NPPF paragraph 25.
- **The requirement for a noise assessment report and mitigation plan is stated in Policy HA2, but the detailed specification is almost non-existent.** While the minimum requirements for an assessment are provided on the HDC website, the detail regarding noise metrics and data sources such as contour maps, does not appear to have been discussed. We also note Homes England’s downplaying of the possibility of expansion in their response to HDC’s Sustainability Appraisal 2021 ‘...the noise contour of Gatwick Airport is of reduced importance as a southern runway expansion of Gatwick is not currently supported by the Government.’ ie the focus is on the impact of expansion to the south, and expansion to the north is ignored. HDC have however recently provided some detailed requirements in their response to Homes England’s EIA Scoping Request.
- The Plan and Evidence Base specify only two metrics for the assessment: HDC’s limit of 60dB LAeq, 16hr, and the Horsham / Crawley Statement of Common Ground requirement to use the Gatwick Master Plan 2019 Additional Runway Summer Day 2040 contour map (Plan 31) which models the new Southern runway scenario. **Given Plan 31 suggests some houses West of Ifield would be exposed to HDC’s 60dB LAeq, 16hr, what does this mean for the allocation of West of Ifield? Does the fact that the secondary school would likely sit in the 57 – 60 dB Leq also raise questions?**

1. Introduction

This representation comments on the soundness of the Plan, in particular Policy HA2, as well as identifying instances where policy HA2 should be more specific, be better informed by data and evidence, and should be expanded to cover all key impacts.

The strategy to allocate the West of Ifield is assessed for compliance with the relevant paragraphs of the NPPF (September 2023), ie 24, 25, 174 and 185.

In particular, the Local Plan policies, and supporting documents in the Evidence Base have been assessed to establish whether the allocation of the West of Ifield has placed significant weight on the current and future noise created by Gatwick airport, and has taken a reasonable position with regard to the uncertainty around Gatwick’s future expansion and changing flightpaths.

2. Policies and Guidance

The policies and guidance considered are:

- World Health Organisation Noise² 27 April 2010
- NPPF³ (September 2023) and Planning Practice Guidance⁴ 2019
- HDC Local Plan Policies
- The HDC website page on Noise reports and noise assessments⁵

See supporting document for the Noise Policy Statement for England⁶ (2010), and the WHO Environmental Noise Guidelines for European Region⁷ (2018).

² <https://www.who.int/europe/news-room/fact-sheets/item/noise>

³ <https://webarchive.nationalarchives.gov.uk/ukgwa/20230929144819/https://www.gov.uk/government/publications/national-planning-policy-framework--2>

⁴ [Noise - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/publications/noise)

⁵ <https://www.horsham.gov.uk/planning/planning-applications/guidance-for-preparing-a-planning-application/noise-reports-and-noise-assessments>

⁶ [Noise policy statement for England - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/publications/noise-policy-statement-for-england)

⁷ https://www.euro.who.int/_data/assets/pdf_file/0008/383921/noise-guidelines-eng.pdf

World Health Organisation (WHO), 27 April 2010

The relevant paragraphs of the guidance are as follows:

- Noise is an underestimated threat that can cause a number of short- and long-term health problems, such as for example sleep disturbance, cardiovascular effects, poorer work and school performance, hearing impairment, etc.
- Noise has emerged as a leading environmental nuisance in the WHO European Region, and the public complains about excessive noise more and more often.
- The WHO guidelines for community noise recommend less than 30 A-weighted decibels (dB(A)) in bedrooms during the night for a sleep of good quality and less than 35 dB(A) in classrooms to allow good teaching and learning conditions.
- The WHO guidelines for night noise recommend less than 40 dB(A) of annual average (L_{night}) outside of bedrooms to prevent adverse health effects from night noise.

NPPF, September 2023

The relevant paragraphs of the National Planning Policy Framework (2019) are as follows.

Paragraph 24. *Local planning authorities and county councils (in two-tier areas) are under a duty to cooperate with each other, and with other prescribed bodies, on strategic matters that cross administrative boundaries.*

There is a lack of effective cooperation between HDC and CBC on issues such as noise and pollution in relation to the West of Ifield site.

- It's not clear which LA leads on this issue, and there is evidence that HDC has not been sufficiently engaged in discussions with Homes England or Crawley Borough Council in respect of specifying baseline surveys, and criteria for the Noise Impact Assessment Report. See Table 11.1 in the Homes England 2023 Environmental Impact Assessment Scoping Request Report.
- Noise is not considered a strategic area for cooperation in the NW Sussex Statement of Common Ground 2020 which given the scale of Gatwick Airport and the scale of the development proposed at West of Ifield is a significant shortcoming and needs to be addressed in advance of consideration of the proposed development. This lack of cooperation contravenes NPPF paragraph 24.
- Paragraph 8.3 of the Horsham / Crawley State of Common Ground states '*The appropriate noise contours for decision-making are the Gatwick Master Plan 2019 Additional Runway Summer Day 2040 contours (Plan 31) until such time as these are superseded by subsequent noise contours that are published by Gatwick Airport and approved by the CAA.*' This contour map assumes the additional Southern runway has been constructed. Nothing is said about the Northern runway plans.

Paragraph 25. *Strategic policy-making authorities should collaborate to identify the relevant strategic matters which they need to address in their plans. They should also engage with their local communities and relevant bodies including Local Enterprise Partnerships, Local Nature Partnerships, the Marine Management Organisation, county councils, infrastructure providers, elected Mayors and combined authorities (in cases where Mayors or combined authorities do not have plan-making powers)*

The actual and potential future impacts of Gatwick noise are not afforded sufficient weight in the Plan given they affect many parishes in the District. This is a failure to 'identify relevant strategic matters' and contravenes NPPF paragraph 25.

- The fact that there is a DCO for an additional northern runway currently under Examination is ignored or down-played. Consideration should be given to the option of delaying progression of the Plan until the outcome of the DCO is known.
- The requirement for a noise assessment report and mitigation plan is acknowledged in Policy HA2, but the detailed specification is almost non-existent. While the minimum requirements for an assessment are provided on the HDC website, the detail regarding noise metrics and data sources such as contour maps, does not appear to have been discussed. We also note Homes England's downplaying of the possibility of expansion in their response to HDC's Sustainability Appraisal 2021 '*...the noise contour of Gatwick Airport is*

of reduced importance as a southern runway expansion of Gatwick is not currently supported by the Government.’ ie the focus is on the impact of expansion to the south, and expansion to the north is ignored.

- Future noise from Gatwick is forecast to increase to levels that would be unacceptable and would have ‘significant adverse effects’ on future residents of WOI. See below.
- There is no evidence that HDC or HE have engaged with local community groups concerned about Gatwick noise and expansion, ie Communities Against Gatwick Noise Emissions (CAGNE)⁸ and Gatwick Area Conservation Campaign (GACC)⁹.

Para 174 contains the following: *Planning policies and decisions should contribute to and enhance the natural and local environment by:*

*e) preventing new and existing development from contributing to, being put at unacceptable risk from, or being adversely affected by, unacceptable levels of soil, air, water or **noise pollution** or land instability... and*

Para 185. *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:*

a) mitigate and reduce to a minimum potential adverse impacts resulting from noise from new development – and avoid noise giving rise to significant adverse impacts on health and the quality of life ; Footnote 65: See Explanatory Note to the [Noise Policy Statement for England](#) (Department for Environment, Food & Rural Affairs, 2010).

HDC have not presented evidence that their decision to allocate the West of Ifield is based on an adequate assessment of Gatwick’s current and future noise impact. Neither is there evidence that an adequate assessment will be carried out. NPPF paragraphs 174 and 185 are contravened.

First, it appears that the decision to allocate West of Ifield is justified by the policy requirements in HA2 that residents will not be exposed to noise levels above 60dB LAeq, 16hr, and that a full noise impact assessment is carried out. But we note several factors which combined may well lead to an inadequate assessment by Homes England, and inadequate challenge by HDC:

- There is little in the Evidence Base to indicate consideration of the specification for the assessment, or noise in general
- A general lack of engagement on noise issues by all parties
- A lack of consideration of GAL’s plans for expansion and increased air traffic
- The complexity of noise assessment generally
- The need for strong engagement and policy on noise in the Gatwick area.

We note the Planning Policy Guidance point about the likely need for specialist assistance for the assessment.

Second, although the high-level ‘minimum requirements’ for the assessment report are available on the HDC website, only two detailed criteria seem to have been specified so far:

- A. *‘No residential or other noise sensitive uses are permitted anywhere on the site considered to be exposed to current or potential future aircraft noise level, which is above 60dB LAeq, 16hr’ – HDC Plan policy HA2 Box point 5; and*
- B. *‘The appropriate noise contours for decision-making are the Gatwick Master Plan 2019 Additional Runway Summer Day 2040 contours (Plan 31) until such time as these are superseded by subsequent noise contours that are published by Gatwick Airport and approved by the CAA.’ - Paragraph 8.3 of the Horsham / Crawley State of Common Ground.*

⁸ <https://cagne.org/>

⁹ <https://www.gacc.org.uk/>

But Homes England's 2023 EIA Scoping Request Report [11.3.27](#) explains that *'the assessment of aircraft noise will consider the Gatwick Airport*

- C. *Second Runway 2040 Option 3 (Wide Spaced Mixed Mode) No EATs 2040 Leq 54-72 dB(A) Contours and the*
- D. *2040 Second Runway Option 3 (Wide Spaced Mixed Mode) No EATs 2040 Summer Night N60 Contours.'*

GAL also responded to Homes England in 2023: *'GAL's advice is to use the 2040 summer day contours in any noise assessment'*.

No more detail is provided about the assessment, and several points seem pertinent:

1. It's not clear if the first of the Homes England metrics (C) is equivalent to the *Additional Runway Summer Day 2040 contours (Plan 31)* specified in the Statement of Common Ground (B)?
2. On the assumption that Homes England are referring to their noise impact assessment in chapter 11 of the 2023 EIA, then their intended specification needs to be much more comprehensive in line with the minimum considerations in paragraph 2.5.1 of the Advice Document on HDC's website.
3. More generally there is little evidence to suggest that HDC and Homes England have had the *'discussion [which] will be required with the LPA for the purpose of establishing suitable assessment techniques and standards to be achieved'* – Advice Document on HDC website.
4. **There is little evidence that HDC or HE have adequately considered or given sufficient weight to the potential noise impacts of airport expansion and likely changes to flightpaths and frequency.** Aside from the long-standing ambition for an additional full runway to the South, GAL has a DCO for adding a Northern runway currently under Examination, and plans for increasing flight frequency and changing flightpaths. These appear to be down-played by HDC and HE, although HDC's response to Homes England's 2023 EIA Scoping Request does start to address the impact of the Northern runway project. Consideration should be given to the option of delaying progression of the Plan until the outcome of the DCO is known.

Third, we have little or no expertise in noise measurement, but would like to raise some concerns and questions about the metrics:

5. **It seems highly unlikely that HDC's single metric of 60dB LAeq, 16hr as an HA2 requirements can be adequate** to protect future residents. We note the Planning Practice Guidance (PPG) point below about the need to consider not only the level of noise, but also the duration, time of day, number of occurrences, etc. We also note the detail in paragraph 2.5.1 of the Advice Document on HDC's website. And the World Health Organisation's (WHO) – Environmental Noise Guidelines For European Region¹⁰ 2018 make clear that night-time noise events should also be assessed. The WHO recommend less than 40 dB(A) as an annual average outside bedrooms. Gatwick provide noise reports which have been undertaken by the community. A Rusper one from 2009 indicated an average night aircraft noise level of 50dBA.¹¹
6. The contour map specified in the Statement of Common Ground *Summer Day 2040 contours (Plan 31)* shows contours specified in Leq, which is a different metric to that used in the HDC requirement, ie LAeq, 16hr. **Can the two criteria be used together, ie can the Leq contour be used to indicate where residents will be affected by 60dB LAeq, 16hr? And are these metrics consistent with those in paragraph 2.5.1 of the Advice Document?**
7. **The 2040 contours in Plan 31 were forecast over 10 years ago and these forecasts should be updated.** The Gatwick Master Plan 2019 explains that the 2040 contours in Plan 31 relate to *'An additional runway to the south 5.5.29 For our work for the Airports Commission we submitted, in 2014, detailed information on the noise impacts of the proposed additional runway as forecast at that time. The 2040 summer day contours are shown in Figure 5.14. This shows a much larger number of people affected by noise than the two other growth*

¹⁰ <https://www.euro.who.int/en/health-topics/environment-andhealth/noise/publications/2018/environmental-noise-guidelines-for-the-european-region-2018>

¹¹ Applied Acoustic Design "A Report of Monitoring of Aircraft Noise from Gatwick Airport at Rusper, West Sussex between January and December 2009".

scenarios now being considered, as a result of the much higher number of aircraft movements with an additional runway.'

Fourth, GAL's response to the 2020 EIA Scoping Request (EIA 2023, Table 11.1 – Consultation Undertaken to Date) makes clear that they consider *'54dBA Leq contour represents the threshold for the onset of significant aircraft noise in the daytime and 48 dBA Leq at night'*. They do qualify this by saying *'To be clear this does not mean that noise development should not be allowed where noise levels exceed 54dBA Leq day / 48dBA Leq night, but it is important that the effects on noise sensitive development is properly assessed and mitigation is planned accordingly to protect against significant adverse effects on such development.'*"

8. An unscientific analysis of Plan 31 – see below – with the West of Ifield site superimposed in red seems to suggest that although HE plan to avoid placing houses to the north of the site, should the Southern runway be built, then **almost all houses would experience over 54db_{Leq}¹² on average during a summer day, and some would experience up to 60db_{Leq}. In addition the secondary school is on the boundary with the 57 db_{Leq} contour.**
9. **Given Plan 31 suggests some houses West of Ifield would be exposed to HDC's 60dB LAeq, 16hr (assuming we can directly compare 60dbLeq with 60dB LAeq, 16hr), in the event of construction of a Southern runway, and this is the scenario specified for assessment in the Statement of Common Ground, what does this mean for the allocation of West of Ifield? Does the fact that the secondary school would likely sit in the 57 – 60 dB Leq also suggest constraints?**

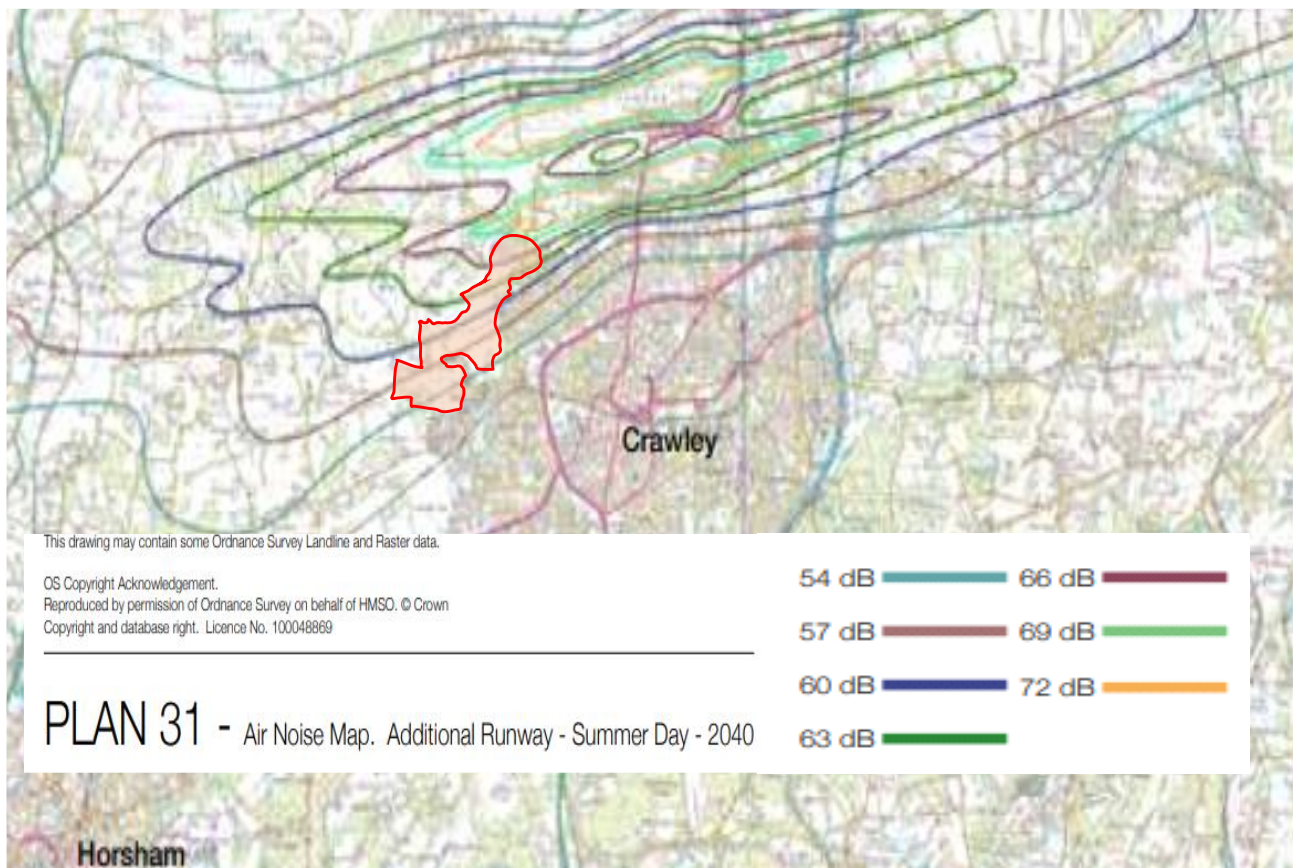
And finally, both the Advice Document and the 2023 EIA Scoping Report reference the **World Health Organisation's (WHO) – Environmental Noise Guidelines For European Region**¹³ 2018 which *'strongly recommends reducing the average (day, evening, night) noise exposure level below 45 db L_{den} and the night noise exposure below 40 db L_{night} as aircraft noise above this level is associated with adverse health effects'*. And the Advice Document makes clear that *regular night time noise events such as scheduled aircraft or passing trains which can cause sleep disturbance shall be minimized and assessed as (LAfmax), as recommended in the World Health Organisation's (WHO) Night Noise Guidelines for Europe (2009), unless there are particular reasons why this is not considered appropriate. In such cases, a clear explanation of the reasons should be provided.'*

10. **It is unclear to us as non-experts whether HDC's limit of 60dB LAeq, 16hr is higher or lower than the WHO Guideline of 45 db L_{den} and this should be explained both in the Plan and Advice Note and in Homes England's EIA. It does seem clear however that this single daytime metric is insufficient, particularly given the seemingly increasing early morning and late night flights. HDC should also specify a night-time metric in line with WHO Guidelines.**

¹² Although Plan 31 is not labelled as such, earlier paragraphs (eg 5.5.30) in the Gatwick Masterplan state that the metric is Leq.

¹³. <https://www.euro.who.int/en/health-topics/environment-andhealth/noise/publications/2018/environmental-noise-guidelines-for-the-european-region-2018>

Contour map from GAL Masterplan – 2040 summer day with new Southern runway. Leq.



Planning Practice Guidance (2019)

Para 003 – ‘Plan-making and decision making need to take account of the acoustic environment and in doing so consider:

- whether or not a significant adverse effect is occurring or likely to occur;
- whether or not an adverse effect is occurring or likely to occur; and
- whether or not a good standard of amenity can be achieved.

In line with the [Explanatory note of the noise policy statement for England](#), this would include identifying whether the overall effect of the noise exposure (including the impact during the construction phase wherever applicable) is, or would be, above or below the significant observed adverse effect level and the lowest observed adverse effect level for the given situation [see para 004]. As noise is a complex technical issue, it may be appropriate to seek experienced specialist assistance when applying this policy.

Para 004 – What are the observed effect levels? See Hierarchy Table for more information. ...

Although the word ‘level’ is used here, this does not mean that the effects can only be defined in terms of a single value of noise exposure. In some circumstances adverse effects are defined in terms of a combination of more than one factor such as noise exposure, the number of occurrences of the noise in a given time period, the duration of the noise and the time of day the noise occurs.’

See [the noise policy statement for England](#) for further information.

HDC Local Plan

The relevant paragraphs from the Local Plan are given below for reference, but issues with them have been discussed in the previous section covering the NPPF.

Policy 11: Environmental Protection

Paragraph 6.10 states *‘Noise pollution can also significantly impact on the quality of life and health of individuals and communities. To help avoid adverse noise impacts from development, authorities in East and West Sussex have jointly produced Planning Noise Advice Document. Applicants should therefore address the issues raised in this document prior to making an application. Impacts on existing residents will also be a particular consideration.’*

The Advice Document is considered in the next section.

The Policy 11 **Box point 5** states that *‘Development proposals must ensure that they:*

5. Demonstrate that users of residential and other noise sensitive development will not be exposed to unacceptable noise disturbance from existing or future users. Development proposals which are known or suspected to be noise generators, or to be sensitive to noise from nearby sites, must be accompanied by a Noise Assessment.’

Strategic Policy HA2: Land West of Ifield

Paragraph 10.83 states: *‘The settlement of Crawley directly adjoins the north eastern boundary of Horsham District. The town plays a key economic role within North West Sussex and is at the centre of the Gatwick Diamond with significant employment and a large range of services and facilities. The town has tight administrative boundaries and constraints including aircraft noise which has meant that in recent years that it has been unable to meet the full housing need for the town.’*

The Policy HA2 **Box point 6** states that *‘Development will be in accordance with a comprehensive masterplan which ... will provide the following: ...6. A full noise impact assessment and mitigation strategy is submitted and agreed by the Council, which demonstrates that aircraft noise has been assessed and its impacts mitigated across the whole development. No residential or other noise sensitive uses are permitted anywhere on the site considered to be exposed to current or potential future aircraft noise level, which is above 60dB $L_{Aeq, 16hr}$. Gypsy and Traveller accommodation should be located where noise impacts are not in excess of 57 decibels reflecting the lower level of acoustic attenuation provided by caravans.’*

HDC website page – Noise reports and noise assessments¹⁴

The website provides links to two documents: *Defra’s Noise Policy Statement for England (2010)*¹⁵ and *Planning Noise Advice Document: Sussex, September 2021*¹⁶. Both explain the circumstances under which noise reports and noise mitigation plans are required, and the minimum requirements for both – see extracts below.

We presume that the Advice Document forms the basis for the specification for Homes England’s noise impact assessment, and it is referenced in the 2023 EIA. But we note a couple of possible inconsistencies:

1. The minimum considerations in paragraph 2.5.1 of the Advice Document (below) appear to be significantly more comprehensive than those listed in the 2023 EIA paragraph 11.3.27.
2. More generally there is little evidence to suggest that HDC and Homes England have had the *‘discussion [which] will be required with the LPA for the purpose of establishing suitable assessment techniques and standards to be achieved.’*

The Planning Noise Advice Document makes clear that a noise report will be required for the West of Ifield development:

¹⁴ <https://www.horsham.gov.uk/planning/planning-applications/guidance-for-preparing-a-planning-application/noise-reports-and-noise-assessments>

¹⁵ <https://www.gov.uk/government/publications/noise-policy-statement-for-england>

¹⁶ https://www.horsham.gov.uk/data/assets/pdf_file/0004/67684/PNADS-FINAL-2021_09_01.pdf

Table 1 – ‘Noise reports will normally be required for new residential development ... within the predicted 54dB contour of an existing or proposed expansion of an airport or the vicinity of an aerodrome, or the final approach and departure routes of an operational runway.’

Para 6.6.4. *Where it is apparent to the LPA that existing noise from an existing industrial, commercial, entertainment premises, places of worship, sports clubs, airfields, airports and sea ports is likely to cause unreasonable or adverse effects to new residents, the development is unlikely to be supported unless the applicant (or ‘agent of change’) provides clear evidence that adequate noise attenuation to the existing noise sources can and will be provided. The applicant (or ‘agent of change’) will be required to provide a detailed noise mitigation plan with their acoustic assessment.*

The minimum requirements for the report are set out, which presumably form the basis for the assessment discussed in Chapter 11 of Homes England’s EIA Scoping Opinion Request Report:

2.5 Minimum Considerations for Noise Sensitive Development

2.5.1. For a new noise sensitive development near an existing source of transport noise (road, rail, ports or aircraft) the LAeq (16hr day and 8hr night), should be measured. In addition, suitable shorter term LAeq, LA90, LA10 and LAfmax would be expected in order to give a clearer picture of the existing noise environment.

2.5.2. Where the external LAfmax sound levels are likely to exceed 60 dB during the night period, overnight monitoring will be necessary. A specific LAfmax,1 minute risk assessment shall be provided for the whole night period. This could also apply to extensions/ alterations to existing development.

2.5.3. For a new noise sensitive development next to a commercial noise source, where practical, each existing potential noise source would need to be measured separately and details provided of the hours of operation, the LAeq, the tonality, character, impulsivity and/or intermittency of the noise (see BS 4142) and the hours of occurrence. The existing background noise level (LA90) will also have to be measured with and without the commercial noise sources in operation in accordance with BS 4142

Section 6.5 sets out the Design Criteria for Noise Sensitive Development, which will be relevant should mitigation be needed.

6.5.2. Design control measures should aim to meet the recommended standards set out in table 4 of BS 8233:2014 and regular night time noise events such as scheduled aircraft or passing trains which can cause sleep disturbance shall be minimized and assessed as (LAfmax), as recommended in the World Health Organisation’s (WHO) Night Noise Guidelines for Europe (2009), unless there are particular reasons why this is not considered appropriate. In such cases, a clear explanation of the reasons should be provided.

6.5.3. As the standards for BS 8233:2014 and the WHO relate only to anonymous noise, eg distant road traffic and noise without characteristics such as impulsivity, low frequency content or tones then, if these are present, additional discussion will be required with the LPA for the purpose of establishing suitable assessment techniques and standards to be achieved eg BS 4142:2014 + A1: 2019 for delivery noise.

4. The evidence base¹⁷

Two documents from HDC’s Evidence Base are considered:

- Strategic Site Assessment, December 2023¹⁸
- Sustainability Appraisal¹⁹ 2021 and 2023, and Appendices²⁰

Plus consideration is also given to:

¹⁷ <https://www.horsham.gov.uk/planning/local-plan/local-plan-review-evidence-base>

¹⁸ https://www.horsham.gov.uk/_data/assets/pdf_file/0020/131735/HDC-Reg-19-Site-Assessment-Report-Part-II-Strategic-Sites-Dec-2023.pdf

¹⁹ https://www.horsham.gov.uk/_data/assets/pdf_file/0006/132378/Sustainability-Appraisal-Dec-23.pdf

²⁰ [Final-SA-Report-for-Horsham-District-Local-Plan-Reg-19-Appendices-document.pdf](https://www.horsham.gov.uk/_data/assets/pdf_file/0006/132378/Sustainability-Appraisal-Dec-23.pdf)

- Homes England's EIA Scoping Opinion Request Report 2023;

Strategic Site Assessment

Page 94 Environmental Quality (Soil / Air / Water): *'The West of Ifield site is within proximity to Gatwick Airport, and therefore susceptible to aircraft noise. The promoter's indicative masterplan shows that all noise sensitive development will be located to the south of the 60dB LAeq,16hr noise contour, thereby complying with the policy framework set out in the Crawley Local Plan and supported by this Council. A full noise impact assessment will need to be undertaken.'*

Page 102 *The site is close to Gatwick Airport – this is beneficial in terms of economic links, but there is potential for new development to be adversely impacted by noise. The indicative masterplan shows that all noise sensitive development will be located to the south of the 60dB LAeq,16hr noise contour.*

The Site Assessment appears to be referencing the 60dB LAeq,16hr criterion in relation to current noise contours rather than future scenarios. The fact that there is a DCO for an additional northern runway currently under Examination should be mentioned.

HDC Sustainability Appraisal - Appendices²¹

The Sustainability Appraisal was conducted in 2021 with an Update document published in 2023. The Update does not appear to have changed any aspect of the appraisal in respect of Gatwick noise.

The references in the **Main document** (2021) of relevance for HA2 are:

4.16 *The positive effects expected for Option 3 (Higher growth), Option 4 (Near maximum growth) and Option 5 (Maximum growth) are combined with an uncertain negative effect as the substantially higher levels of growth associated with those options may result in ... the need to deliver a higher level of growth within the Gatwick Airport noise contour to the north east of the District, meaning that there would be increased potential for adverse impacts in terms of exposure of residents to noise pollution.*

8.291 *... An uncertain minor negative effect is also expected for Policy 43: Gatwick Airport Safeguarding. Safeguarding land which could support a potential additional runway at Gatwick Airport, could result in an expansion of the noise buffer in the District within which human health might be adversely impacted upon*

8.313 *[West of Ifield] The policy furthermore requires that no noise sensitive uses are delivered at the site within areas considered to be exposed to aircraft noise level which is above 60dB LAeq, 16hr. This is expected to help mitigate the adverse effects of noise associated with the nearby Gatwick Airport.*

Does the Sustainability Appraisal not take account of likely future events, such as airport expansion? Should 8.313 not acknowledge this?

The **Appendices document**

Page 15 – Homes England's response to the SA contests SA objective 5: Health and wellbeing - arguing that *'a mixed significant positive and minor negative is more applicable than the significant positive and significant negative identified through the SA. It is stated that the open space would be provided at the development and that the noise contour of Gatwick Airport is of reduced importance as a southern runway expansion of Gatwick is not currently supported by the Government.'*

So Homes England were disregarding the impact of expansion to the North and the impact of increasing frequency of air traffic and changes to flightpaths.

²¹ <https://www.horsham.gov.uk/planning/local-plan/local-plan-review-evidence-base>

Page 57 – Policy Context under the heading: Air and noise pollution. ‘Air and noise pollution are issues for the health of residents and workers in Horsham District, particularly around Storrington and Cowfold where the areas have been identified as Air Quality Management Areas (AQMAs) in the district. Air pollution in the District is addressed in more detail later in this appendix.’. This was restated in the Update document 2023 – A.36

It is notable that the Policy Context paragraphs make no mention of noise pollution impacting residents in the north of Horsham District, particularly in Rusper and other parishes affected by Gatwick aircraft noise. We have noted the downplaying / understating of issues and characteristics – positive and negative – affecting Rusper parish in other Policy and topic responses, for example our Policy HA2 response regarding Biodiversity.

Page 118 – Large site options – WOI - SA 5: To improve public health and wellbeing and reduce health inequalities acknowledges that: ‘Part of the northernmost part of the [WOI] site is located within the noise contour for Gatwick Airport. The site promoters plan to locate housing and education facilities to the south of the site to avoid impacts of aircraft noise on residents. However, **there may still be potential for negative impacts from aircraft noise particularly considering the potential for growth at Gatwick in the future.**

Overall, an uncertain mixed significant positive and significant negative effect is expected for the site in relation to this SA objective. ...

Effects at Regulation 19 stage: Part of the site still falls within the noise contour for Gatwick Airport.’

It doesn’t look as if the likely exposure to significant levels of Gatwick noise has been adequately taken into account in the scoring, and we would suggest a negative score for Health and Wellbeing.

Homes England’s West of Ifield EIA Scoping Opinion Request, October 2023

The EIA Scoping Request Report 2023 gives an impression of how the issue of current and future aircraft noise has been addressed so far in HDC’s and HE’s planning and decision-making.

On the assumption that the noise assessment mentioned in chapter 11 is the ‘full noise impact assessment’ required by HDC policy HA2, then a couple of points can be made on the draft EIA.

- 1. Insufficient weight is given in the EIA to the potential noise impacts of airport expansion and likely changes to flightpaths and frequency.**
2. The potential impact of the Northern runway (currently at DCO stage) is not mentioned. Although HDC’s response to the Scoping Request does start to address the impact of the Northern runway project – see below.
3. The potential impact of a new Southern runway appears to be considered solely via the GAL contour maps based on 2014 data and analysis. Paragraph 11.3.27 explains that ‘the assessment of aircraft noise will consider the Gatwick Airport
 - *Second Runway 2040 Option 3 (Wide Spaced Mixed Mode) No EATs 2040 Leq 54-72 dB(A) Contours and the*
 - *2040 Second Runway Option 3 (Wide Spaced Mixed Mode) No EATs 2040 Summer Night N60 Contours.*

As already discussed in Section 2 of this submission:

- a. It’s not clear if the first of these is equivalent to the Additional Runway Summer Day 2040 contours (Plan 31) specified in the Statement of Common Ground.
- b. These contour maps are based on data and analysis from 2014, and should be updated.
- c. Are these two maps sufficient to assess the impact of a doubling in size of the airport?

GAL’s response to HE regarding use of the maps is copied below, from Table 11.1.

4. The minimum considerations for a noise assessment in paragraph 2.5.1 of the Advice Document appear to be significantly more comprehensive than those listed in the 2023 EIA paragraphs 11.3.25 – 27 and 11.6.4.
5. Table 11.1 (extract below) shows a historical lack of engagement from HDC during the 2019 consultation process between HE, HDC and CBC. It is possible that the situation has changed – the response from HDC on 27th November 2023 does mention employment of an aviation specialist, and provides more specific guidance on what should be included in the assessment.

HDC's response to the 2023 Scoping Request – 27th November 2023

Aviation Noise:

- *The assessment adopted for the EIA adopts annualised metrics which do not account for worst case single mode operations at the airport.*
- *Annualised metrics are unlikely to capture the full impact of aviation noise, particularly for overflight, and additional metrics should be employed. This should include consideration of single-mode noise impacts to ensure worst case effects are fully captured.*
- *Gatwick Airport Limited (GAL) has provided information on air traffic movements associated with northern runway project in response to questions from the local authority's aviation consultant that show a projected increase in morning peak hour departure along the Route9/WIZAD route which may impact the development site. This is projected to increase from 0% departures in 2019 to 13% of total departures when the Northern Runway Project is fully operational.*
- *For westerly take offs the peak time of use will be 06:00 to 07:00. Route four is predicted to be saturated and Route 9/Wizad – tactical offset route will be triggered to alleviate resulting air space congestion. This route directs air traffic to the south and east over Horsham.*
- *GAL have maintained that WIZAD cannot be used for schedule departures as it is available to NATS as a tactical offset route to relive airspace congestion. Therefore, it does not need to be considered as part of the Northern Runway Project. However, GAL clearly anticipate increase the use of WIZAD as a key to achieving full operational potential of the Northern Runway Project.*
- ***This would represent a significant increase in flights using the WIZAD route with the result increase in overflight. This further reinforces the need for metrics other than the annualised LAEQ to ensure this increase is properly modelled and to allow appropriate mitigation to be considered.***
- ***The implementation of sound insulation measures is likely to significantly increase the risk of overheating in affected dwellings and therefore insulation scheme should also include an overheating assessment and provision of mechanical ventilation. The energy cost associated ventilation and particularly cooling in warmer weather can be significant. Measures such as PV panels and battery storage to offset energy use should also be considered as part of any scheme.***

EIA Table 11.1 – Consultation responses

See both the first HE EIA submission to HDC (Oct. 2020 - Table 11.1) and the second HE EIA submission to HDC (Oct. 2023 - Page 95 ref. date 04.07.2019):

17th May 2019 – **Issues raised by HE:** proposed baseline noise monitoring locations and durations; proposal to scope out baseline vibration surveys; the use of current CBC and HDC Local Policies with regards to noise and vibration; and consideration of Gatwick Airport noise contours and the second runway proposal.

Response from HDC received 24th June 2019: No comment received regarding proposed survey methodology. Agreement received to scope out vibration surveys, **use Gatwick Airport 60dB contour cut-off for sensitive development** and some commentary provided regarding Local Authority policies and the use of future Gatwick Airport noise contours in the assessment – Draft response.

25th June 2019 - ... **HE request for response from HDC. Response received 25th June 2019: Confirmation that only CBC will provide comments, and that HDC Environmental Health Officer agrees with the CBC Officer comments. Responses to other queries still to be received.**

11th July 2019 - Clarifications received relating to reference documentation and Local Plan clarifications. Survey protocol agreed including locations, durations and other specifics. Advice given relating to the reference to the Summer 2040 Air Noise Map relating to Gatwick Airport noise contours.

5th May 2020 – Brian Cox [??] Clarification received as to which specific Gatwick Airport noise contour map should be used (as the 2019 masterplan document includes numerous maps). **The response confirmed that the '2040 2nd wide spaced runway contours are the most applicable'.**

GAL - Response to Scoping Opinion, dated 28th October

- 2020 Support the use of the future wide-spaced runway noise contours for the year 2040 in the assessment.
- The assessment of significance should take into account latest government advice that the 54dBA Leq contour represents the threshold for the onset of significant aircraft noise in the daytime and 48 dBA Leq at night (SOAEL).
- The opinion does however state: “To be clear this does not mean that noise development should not be allowed where noise levels exceed 54dBA Leq day / 48dBA Leq night, **but it is important that the effects on noise sensitive development is properly assessed and mitigation is planned accordingly to protect against significant adverse effects on such development.**”

Planning Manager – Consents & Policy, email of 23rd January 2023 to Homes England: **“GAL’s advice is to use the 2040 summer day contours in any noise assessment”**.