



Historic England

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Date 25 October 2023

Dear Sir or Madam

Gatwick Northern Runway Project Application Section 56 Consultation

I refer to the proposals for the Gatwick Northern Runway Project.

Introduction

Historic England was consulted on the current proposal for a northern runway at Gatwick Airport informally at pre-application stage and at S.42 stage, and held a number of meetings with the applicant (Gatwick Airport Limited) and their consultant teams during the period from February 2021 to July 2023. Alongside the proposals themselves, we have been involved in meetings and exchanges relating to the Environmental Statement and, in particular, the historic environment sections of the report. We welcome the proactive and open approach to the discussions by GAL and their team throughout the process.

Advice

Significance

The area in which Gatwick airport operates straddles the county boundaries of West Sussex and Surrey, although the majority of the site sits within the jurisdiction of Crawley District Council. The area is part of the Sussex Low Weald, a landscape with a considerable time depth and a correspondingly broad range of heritage assets, buried and built, designated and undesignated, from the Palaeolithic right through to the 'moderne' buildings associated with the early airport development.

Summary - Impact on Heritage Assets

The consultation relates to the proposal to make best use of Gatwick Airport capacity by increasing the use of a realigned northern runway along with enhancing passenger capacity by improving ancillary facilities and access.



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In the view of Historic England, under this scheme proposal there is the potential for harm to a range of heritage assets, including:

- to a number of undesignated archaeological heritage assets in areas to the east of the existing airport, probably amounting to less than substantial harm;
- less than substantial harm to the significance of one grade II* listed building (the Charlwood Park Farmhouse) and a small number of grade II listed buildings on the periphery of the airport estate; and
- less than substantial harm to the significance of a scheduled monument (Thunderfield Castle mediaeval moated site) by development in its close setting.

In addition, there is the potential for far-reaching impacts to the setting of heritage assets as a result of changes in the noise profile and disturbance from expanded airport operations.

There is also the possibility of direct or indirect impacts to currently unidentified built heritage assets.

Assessment

The National Planning Policy Framework (NPPF) sets out the overarching aim of the Government to achieve sustainable development through the planning system by pursuing simultaneously economic, social and environmental gains. Part 16 of the NPPF (updated September 2023) sets out the Government's policies in respect of the historic environment. Fundamentally, there is a requirement for planning authorities, when considering the impact of a proposed development on the significance of a designated heritage asset, to place great weight on the asset's conservation consistent with its significance.

It goes on to state that substantial harm to or loss of a grade II listed building should be exceptional and that substantial harm to or loss of scheduled monuments, grade I and II* listed buildings should be wholly exceptional.

Where a proposed development would lead to substantial harm to or total loss of significance, the decision-maker should refuse consent unless it can be demonstrated that the substantial harm or loss is necessary to achieve substantial public benefits that outweigh that harm or loss, or that all of the tests in paragraph 201 of the NPPF apply.

Similarly, where less than substantial harm would occur to the significance of designated or undesignated heritage assets, a balanced judgement should be made about such loss taking into consideration the public benefits associated with the proposals (ref. paragraph 202). Paragraph 203 requires the effect of an application on the significance of a non-designated heritage asset to be taken into account in determining the application.

At this stage in the process, we feel we have sufficient information before us to assess the impacts, or to judge whether any proposed mitigation is likely to be adequate. We have been



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encouraged by the careful and considered approach that has been taken by the project team to carry out heritage impact assessments to inform the scheme design and to seek mitigation wherever possible.

We support the thoughtful approach taken to **undesigned heritage assets** to include unlisted but significant historic buildings, areas of enhanced archaeological potential and the possibility of not currently known about remains.

Based on the work to date (much of which is detailed in the PEIR, Chapter 7: Historic Environment) to characterise the archaeological potential of the land affected, we consider it likely that the harm to **undesigned archaeological assets** could to a large extent be mitigated by the public benefits of an enhanced understanding that could be derived from the opportunity to undertake a detailed archaeological study of this part of the Wealden landscape. Others will lead for advice about this aspect, notably the West Sussex County Council archaeological adviser, but we remain ready to contribute to formulation of a research agenda and to offer strategic advice about its implementation. This could include how best the effects of airport development can be understood through further studies to inform ongoing discussion of mitigation.

We note the potential for impacts to the setting of a number of **designed heritage assets** as a result of changes in the noise profile and disturbance from expanded airport operations.

One **scheduled monument** (Thunderfield Castle medieval moated site, NHLE 1013348) to the east of the airport may be affected by the proposals to improve access roads. We are content, however, that there will be no significant change to the setting of the monument arising from the scheme and that, unless there is a substantial change to the proposals in the vicinity of the monument, this matter does not require further assessment.

It would appear from the plans before us currently that no **listed buildings** would be lost (i.e. through demolition) but that the Grade II* former Charlwood Park Farmhouse, Horley Road (NHLE 1187090) and a number of grade II listed buildings would be subject to direct or indirect impacts that may compromise their significance through changes in their settings. In the context of the NPPF policies above, any harm will require clear and convincing justification. Through LTVIA analysis and additional views assessment it has been possible to demonstrate that the immediate setting of the listed Farmhouse will not be significantly affected by the proposals in the context of its existing compromised situation within the airport operational area. There may be some minor visual intrusion by some new airport structures (e.g. the CARE facility emissions stack), but these are minimal in their impact. We have no concerns about effects on this heritage asset.

There is the possibility of direct or indirect impacts to a small number of grade II listed buildings on the periphery of the airport estate. These are identified and assessed in the ES Chapter 7: Historic Environment report; we have no comment to make on these assessments in detail and broadly agree with the outputs from the assessments. Where impacts to heritage assets are identified, possible mitigations are noted, and we would expect that these are secured through the consenting process.



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The highway changes at Longridge Roundabout and the proposed widening of the A23 bridge over the River Mole, are unlikely to result in significant harm to the setting of the **Church Road, Horley Conservation Area**. The impacts that have been identified from the road works, and as a result of new built structures within the airport proposals intruding in views from the conservation area, are likely to be mitigated by the scheme design and enhanced planting acting as a screening. There is also the prospect of an enhancement to the character and appearance of the conservation area arising from increased public access to Church Field via the new footbridge, and the potential for better heritage interpretation presentation relating to the historic core of Horley village and to the adjacent undesignated Medieval moated site. These mitigations and benefits should be secured in the consent for the scheme via appropriate mechanisms (such as, scheme design or planning obligations).

We note that the issue of **air noise** and its effect on tranquillity form part of the way in which the setting of designated assets are experienced. We acknowledge the work done through the noise assessments (in particular the use of the Temple methodology, originally commissioned by English Heritage (now Historic England)) as specified in the Appendix 7.6.1: Historic Environment Baseline Report and summarised in the updated ES.

The three most affected noise-sensitive heritage assets - viz. the Grade II listed Church of St John the Baptist, Capel (NHLE 1378150); the Grade II listed Quaker Meeting House with attached cottage at Capel (NHLE 1028737); and the relocated Grade II listed Lowfield Heath Windmill, Charlwood (NHLE 1298883) - would not experience a worsened aircraft noise impact based upon this assessment. This would be the case also in regard to the Grade II* listed Church of St Michael and All Angels at Lowfield Heath (NHLE 1187081). On the basis of this assessment we are content that no permanent significant harmful impacts to high-graded designated heritage assets from increased aircraft noise would result for the scheme proposals.

Position

In summary, Historic England notes the potential for impacts on the settings of several heritage assets which amount to less than substantial harm. Some residual harm may be mitigated through detailed design of the scheme elements and secured through condition or agreements attached to any consent.

Yours sincerely

Alan Byrne

Historic Environment Planning Adviser



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