



Gatwick Airport Northern Runway Project

Environmental Statement

Appendix 16.3.1: Summary of Stakeholder Scoping Responses – Greenhouse Gases

Book 5

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1 Introduction

1.1 General

1.1.1 This document forms Appendix 16.3.1 of the Environmental Statement (ES) prepared on behalf of Gatwick Airport Limited (GAL) for the proposal to make best use of Gatwick Airport’s existing runways and infrastructure (referred to within this report as ‘the Project’).

1.1.2 This document provides the summary of stakeholder scoping responses alongside a response for how those have been addressed in this ES for the Project.

2 Summary of Stakeholder Scoping Responses

Table 2.1.1: Summary of Stakeholder Scoping Responses

Stakeholder	Details	How/where addressed in ES
Charlwood Parish Council	Growth of the airport has facilitated substantial growth in aviation's greenhouse gas emissions, making a significant contribution to climate change.	Historic growth of the airport is not considered within the ES. ES Chapter 16: Greenhouse Gases (Doc Ref. 5.1) considers and quantifies the greenhouse gas (GHG) emissions arising from the Project, and the associated changes in energy, surface access and aviation emissions.
Crawley Borough Council	The assessment of climate change and carbon should include as a key element the Government's commitment to achieving an emissions' reduction target of 100% by 2050, (as set out in the Climate Change Act 2008 (2050 Target Amendment) Order 2019). This amendment should be included as a key piece of legislation in section 7.9.8, as well as any further guidance Government on aviation and emissions. This assessment should also consider the impact of other airport expansion projects. Given the importance of reducing greenhouse gases, CBC considers that all greenhouse gases in aviation emissions, and not just CO ₂ as proposed in paragraph 7.9.73, should be assessed.	<p>ES Chapter 16: Greenhouse Gases (Doc Ref.5.1) provides details of the Climate Change Act 2008, including the 2019 change to a 100% reduction in GHG emissions on the 1990 baseline. It also includes other legislation and policy of relevance. The Aviation 2050 Strategy (Department for Transport, 2018b) reviews the climate change policies detailed in the UK Aviation Policy Framework (Department for Transport, 2013). This document has recently undergone public consultation and, as such, does not represent currently adopted policy. Paragraph 3.87 of the strategy states that the Government agreed with the (then) Committee on Climate Change's (CCC's) advice to exclude international aviation emissions from carbon budgets but to leave 'headroom' to account for international aviation so that the whole economy is on a trajectory to achieve the 2050 Climate Change Act target. The paragraph also states that: <i>'To set a clear level of ambition for the sector, the government proposes to: accept the CCC's recommendation that emissions from UK-departing flights should be at or below 2005 levels in 2050'</i>. This has now been superseded by the Sixth Carbon Budget recommendations from the CCC (Committee on Climate Change, 2022), and the inclusion of international aviation within the formal adoption of the Sixth Carbon Budget.</p> <p>The assessment does not consider the aggregate impact of other airport expansion projects but does provide context for the forecast GHG emissions arising from the Project in terms of the existing UK GHG targets.</p> <p>The assessment considers CO₂e for all emissions sources in line with national reporting conventions and national targets for aviation. It is acknowledged that other non-CO₂ GHGs arise from combustion of aviation fuel, and the direct emissions of these accounts for an additional 1% in CO₂e emissions over the CO₂ only emissions.</p> <p>The assessment does not include consideration of other non-Kyoto emissions that may contribute to increases and decreases in warming, in so adopting a consistent approach with the UK Jet Zero Strategy (Department for Transport, 2022).</p>

Stakeholder	Details	How/where addressed in ES
		The assessment of significance, and the consideration of the context of national targets, can only be carried out in the context of the existing policy and carbon targets, and these are expressed in CO ₂ for aviation emissions in the UK.
London Borough of Croydon	The Council has recently declared a Climate Change Emergency and is undertaking a Climate Change Commission and Citizens Assembly. While Gatwick Airport is recognised for its economic contribution to the subregion, aviation clearly has an impact on the environment. It is for Gatwick and the aviation industry more widely to ensure that it can meet current and future climate change and emissions standards and develop Gatwick in such a way as to minimise its negative impact on the environment and climate change. Taking this forward in the Scoping Report the emphasis should be on ensuring that the proposed development is focused on sustainable growth and improves the environment for now and future generations.	ES Chapter 16: Greenhouse Gases (Doc Ref. 5.1) assesses the magnitude of GHG emissions arising from the Project and presents these in the context of current UK carbon targets. It also provides context on the trajectory for future emissions on a sectoral basis to align with updated guidance from IEMA on Assessing Greenhouse Gas emissions and Evaluating their Significance (Institute for Environmental Management and Assessment, 2022).
London Borough of Croydon	The scoping report refers to a commitment to include targets to increase the sustainable mode share for passengers and staff which is welcomed. How these targets will be achieved and their role in mitigating the effects of the proposed development need to be considered. Whilst mode share targets have been indicated for 2022, in the light that the Council has declared a Climate Change Emergency, all travel will need to be sustainable in the medium to long term. Further targets should be developed and agreed looking to the medium term which is provided by the Mayor of London's Transport Strategy. This sets out a target for 80% of journeys to be by sustainable means by 2041. In light of the Mayor's objectives and the Climate Change Emergency we would strongly question the intention to increase 'on airport' parking from its current 46,700. It is considered that there are significant opportunities to increase the proportion of passengers travelling via bus and coach, along with walking and cycling access improvements to the airport. The data listed in 7.6.5 does not appear to cover these modes of transport directly.	Details on mode share is provided in ES Chapter 12: Traffic and Transport (Doc Ref.5.1) and ES Appendix 5.4.1: Surface Access Commitments (Doc Ref. 5.3).
Horsham District Council	In relation to the Assessment of Significance, the meaning of paragraph 7.9.68 requires clarification. The paragraph refers to a 'qualified effect' to be compared against a national carbon budget. In accordance with the recommendations of IEMA guidance 2017, it is expected that the Project's carbon budget should be quantified and compared against an existing carbon budget. Will the fourth and fifth carbon budgets be used for that purpose? Are there regional or local budgets that can be used?	This terminology should have read 'quantified' not 'qualified'. ES Chapter 16: Greenhouse Gases (Doc Ref. 5.1) has quantified the emissions from the Project and compares this to the relevant carbon budgets for the relevant periods of construction and operation for which carbon budgets currently exist. Some organisations have proposed carbon budgets at the local authority level, but these have not been formally accepted for those geographies in which GHG emissions would arise from the Project.
Mid Sussex District Council	It is recommended that the relevance to the assessment of each policy or legislation is fully noted as part of the PEIR or ES	The assessment of greenhouse gases has taken into account relevant policy and this is reported in ES Chapter 16: Greenhouse Gases (Doc Ref. 5.1).
Reigate and Banstead Borough Council	The Council notes that the justification for excluding GHG emissions from CCD stages for inward flights is that "these emissions are outside the scope of influence of the Project as the Project does not include changes to airspace...". Given our previous comments regarding airspace modernisation, we consider that there is a need to take into consideration GHG emissions from CCD stages for inward flights.	Airspace design changes fall under a different regulatory system and process and as such are not considered within the assessment. ES Chapter 16: Greenhouse Gases (Doc Ref. 5.1) does not include an assessment of arriving flights as the methodology used for assessment has been adopted to align with national reporting methods, and with the policy context set out in the Jet Zero Strategy (Department for Transport, 2022).
Reigate and Banstead Borough Council	The Council would welcome clarity as to whether non-CO ₂ radiative forcing effects (including water vapour, contrails, NO _x , etc.) will be taken into consideration in the scope of the assessment of carbon. If not, this will result in a significant change in the figures presented in the final assessment	The assessment is restricted to consideration of GHGs as defined by the Kyoto Protocol. It does not consider wider non-GHG effects. This is set out, along with the supporting rationale, in Section 16.4 of ES Chapter 16: Greenhouse Gases (Doc Ref. 5.1).

Stakeholder	Details	How/where addressed in ES
Reigate and Banstead Borough Council	In terms of the presentation of the findings, we note that Paragraph 7.9.34 of the EIA Scoping Report states that “it is proposed that the findings of the assessment of effects on climate change and carbon would be set out as a topic chapter within the ES, supported by technical appendices where appropriate”. In order to understand the non-CO ₂ radiative forcing effects, we would find it helpful if a table were included within the ES chapter which specifically details the non-CO ₂ radiative forcing impact.	The assessment is restricted to consideration of GHGs as defined by the Kyoto Protocol. It does not consider wider non-GHG effects. This is set out, along with the supporting rationale, in Section 16.4 of ES Chapter 16: Greenhouse Gases (Doc Ref. 5.1).
Surrey County Council	The County Council is broadly content with the approach to the assessment of climatic impacts and carbon emissions set out in section 7.9 (pp.144-160) of the Scoping Report. However, the County Council would recommend that the assessment give consideration to the likely implications of the forthcoming report of the Committee on Climate Change (CCC), which is expected in the autumn. That report is expected to make recommendations for the aviation sector consistent with delivering the Government’s recently legislated target for net zero carbon by 2050. Those recommendations are expected to be taken into account in the Government’s final Aviation Strategy for 2050 and is therefore a key issue for the proposed development at Gatwick that should be factored into the assessment.	ES Chapter 16: Greenhouse Gases (Doc Ref. 5.1) assesses the magnitude of GHG emissions arising from the Project and presents these in the context of current UK carbon targets. The assessment considers the UK Jet Zero Strategy (Department for Transport, 2022) which sets out the UK Government’s strategy for achieving net zero UK aviation, in order to support achievement of the legally binding commitments for the UK to meet net zero in 2050.
West Sussex County Council	In reference to Section 3.2: It is considered that a "low growth" scenario should be added to account for the possibility the growth of the airport will be limited by climate change considerations and/or Brexit.	Forecast data have been provided by the Project’s aviation consultants ICF and further details can be found in ES Appendix 4.3.1: Forecast Data Book (Doc Ref. 5.3).
West Sussex County Council	In reference to Paragraph 7.9.8: The Climate Change Act 2008 (2050 Target Amendment) (Order 2019) should be included in the list of key legislation.	The amended Climate Change Act is referenced in ES Chapter 16: Greenhouse Gases (Doc Ref. 5.1).
West Sussex County Council	In reference to Paragraph 7.9.34: The cumulative impact of the Project along with other airport projects, particularly the Heathrow expansion, should be considered.	A cumulative assessment has not been undertaken within ES Chapter 16: Greenhouse Gases (Doc Ref.5.1). The rationale is detailed in Section 16.10.
Waverley Borough Council	The climate change baseline presented in the scoping request report deals with increases in temperature and of greenhouse gas emissions. The area that would be affected by the development, in terms of the greenhouse gas emissions attributed to the relevant boroughs should be included as part of the EIA. Aviation is set to be the biggest source of UK emissions by 2050. The assessment should include a cumulative impact of CO ₂ emissions arising from both the proposed Gatwick and Heathrow expansions and how these may impact on Waverley Borough residents and businesses as well as the environment, biodiversity, and habitat.	The study area for the assessment of greenhouse gases is detailed in Section 16.4 of ES Chapter 16: Greenhouse Gases (Doc Ref. 5.1). A cumulative assessment has not been undertaken within ES Chapter 16: Greenhouse Gases (Doc Ref.5.1). The rationale is detailed in Section 16.10.
Tandridge District Council	Paragraph 7.9.8 of the EIASR should include as key legislation the Climate Change Act 2008 (2050 Target Amendment) Order 2019. This sets out the Government’s commitment in relation to carbon emission reductions by 2050 and should be central to the assessment of climate change in the ES.	The amended Climate Change Act is referenced in ES Chapter 16: Greenhouse Gases (Doc Ref. 5.1).

3 References

Committee on Climate Change (2022) *Sixth Carbon Budget*.

Department for Transport (2013) *The UK Aviation Policy Framework*.

Department for Transport (2018) *Aviation 2050 Strategy*.

Department for Transport (2022) *Jet Zero Strategy: delivering net zero aviation by 2050*.

Institute of Environmental Management and Assessment (2022) *Environmental Impact Assessment Guide to: Assessing Greenhouse Gas Emissions and Evaluating their Significance 2nd Edition*.

UK Government (2008) *Climate Change Act 2008*.

4 Glossary

4.1 Glossary of terms

Table 4.1.1: Glossary of Terms

Term	Description
CBC	Crawley Borough Council
CCC	Committee on Climate Change
CCD	Climbing Cruise Descent
CO ₂	Carbon dioxide
CO ₂ e	Carbon dioxide equivalent
ES	Environmental Statement
GAL	Gatwick Airport Limited
GHG	Greenhouse Gas(es)
IEMA	Institute of Environmental Management and Assessment
PEIR	Preliminary Environmental Information Report