



# Gatwick Airport Northern Runway Project

Environmental Statement

Appendix 13.2.1: Summary of Local Planning Policy – Air Quality

**Book 5**

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## KEY UPDATES AND CHANGES

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## 1 Introduction

- 1.1.1 This document forms Appendix 13.2.1 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 sets out the relevant local policy to air quality within the study area which has been taken into account for the assessment in **ES Chapter 13: Air Quality** (Doc Ref. 5.1). Details of air quality action plans have been added, where relevant.

## 2 Local Planning Policy

**Table 2.1.1: Local Planning Policy**

Policy	Summary
<b>Adopted Policy</b>	
<b>Crawley Borough Council Air Quality Action Plan (AQAP) 2018 – 2023</b>	
Priority 3 Sustainability (Planning and Policy Guidance)	This highlights the ambition of the local planning authority to strengthen local planning policy for air quality on future developments, emissions mitigation and reduction reporting through the requirement for damage cost calculations.
<b>Crawley 2030: Crawley Borough Local Plan 2015 – 2030</b>	
Policy ENV12 (Air Quality)	This policy states that development proposals must “not result in a material negative impact on air quality”. Proposals must “be supported by evidence detailing the air quality impact of the proposed development” and outline appropriate mitigation that will be implemented, with reference to criteria set in “Air Quality and Emissions Mitigation Guidance for Sussex” to minimise the impact on air quality. Development proposals within a declared Air Quality Management Area (AQMA) set out measures to address objectives in the relevant AQAP.

Policy	Summary
<b>Croydon Local Plan 2016 – 2036</b>	
Policy DM16: Promoting Healthy Communities	This policy addresses the need for healthy communities, requiring developments to “ <i>assess and mitigate pollutants and other environmental impacts on health</i> ”. The Plan also states that “ <i>developments must assess and mitigate the impacts of pollution and look for opportunities to improve air quality</i> ”.
Policy SP6: Environment and Climate Change	In order for the Council to reduce greenhouse gases (GHGs) and “ <i>deliver development that is adaptable in a changing climate</i> ”, the Council is “... <i>requiring development to positively contribute to improving air, land, noise and water quality by minimising pollution...</i> ”.
Policy DM23: Development and construction	The Council is “ <i>ensuring that future development, that may be liable to cause or be affected by pollution through air, noise, dust, or vibration, will not be detrimental to the health, safety and amenity of users of the site or surrounding land</i> ”. To achieve this “ <i>Developers should consider measures to minimise emissions of air pollution at the design stage and should incorporate best practice in the design, construction and operation of the development</i> ”.
Strategic policy 10.1: Transport and Communication	There is a push for active and sustainable transport to reduce road congestion, which is noted to contribute towards air pollution.
<b>London Borough of Croydon AQAP 2017 – 2022</b>	
Section 4 – AQAP	The plan outlines actions that are to be taken into account for the borough to reduce air pollution. The plan looks at aspects such as emissions from developments and buildings, planning policy, public health and awareness raising, delivery servicing and freight, borough fleet actions, localised solutions, engagement with businesses, and cleaner transport. Emphasis is on expected emissions, timescales, and implementation on the aforementioned six categories, and how this

Policy	Summary
	progress can be measured, and by whom to achieve Croydon's Air Quality Priorities.
<b>Elmbridge Borough Council AQAP 2021 – 2026</b>	
Section 2 – Elmbridge's Air Quality Priorities: Priority 1 to 5	Through five key priorities, Elmbridge aims for compliance in AQMAs, and improving air quality across the Borough. The five priorities are reducing nitrogen dioxide (NO <sub>2</sub> ), targeting the World Health Organisation (WHO) fine particulate matter (PM <sub>2.5</sub> ) recommended level of 10 µg/m <sup>3</sup> by 2030 within the Borough, shift to more sustainable transport, prioritise air quality in Council policies, and partner with Surrey Air Alliance to improve Surrey's air quality.
<b>Elmbridge Core Strategy 2011 – 2026</b>	
Policy CS25 – Travel and Accessibility	This policy highlights the Council's drive to seek mitigation for the detrimental effects caused by transport, through measures including improving air quality to meet commitments in the Elmbridge Air Quality Strategy.
Section 4 – Elmbridge 2026 Vision	In this section it is stated that “ <i>areas with high levels of air pollution will be reduced to an acceptable level</i> ” and that measures will be taken to tackle traffic congestion and air pollution.
<b>Epsom &amp; Ewell Borough Council AQAP and Further Assessment of Air Quality for Ewell High Street – 2010</b>	
Section 3.4, CS6, CS16, CS1	There are a number of policies and plans at local and regional levels to support the improvements of air quality in the Borough. This includes aims for proposals of developments to have neutral impacts upon pollution, shifts to non-car transport models, and minimise the need for travel through use of travel plans and enhancement of facilities.
<b>Epsom &amp; Ewell Borough Council Core Strategy 2007 – 2022</b>	
Policy CS 6	The Council proposes that developments should result in a sustainable environment and reduce pollution and climate change.

Policy	Summary
<b>Horsham District Planning Framework (excluding South Downs National Park) 2015</b>	
Strategic Policy 24 Environmental Protection	Horsham District has declared the whole district an 'Emission Reduction Area' under this policy and therefore all developments must make reasonable endeavour to minimise emissions (air pollution and greenhouse gas) and where necessary, offset the development's impacts on the environment.
<b>Air Quality in Kingston upon Thames – A Guide for Public Health Professionals – 2022</b>	
Section 7 – Policy and Legal Framework for Improving Air Quality	The Council sets out national, regional, and local policies that are followed, such as The Air Quality Standards Regulations 2010, The London Plan, and Local Implementation Plans, to guide the Borough in improving air quality.
<b>Royal Borough of Kingston upon Thames Local Development Framework – Core Strategy 2012</b>	
Policy CS 1 – Climate Change Mitigation	The Council has stated that it will direct new developments to previously developed sites to reduce GHG emissions and energy used by transport. This in turn will reduce the levels of pollution, including air pollution.
<b>Royal Borough of Kingston upon Thames AQAP 2021 – 2026</b>	
Section 2 – Priorities	The Council has listed out nine priorities within its AQAP such as installing Ultra Low Emission Vehicle infrastructure, promoting and delivering energy efficiency retrofitting, promoting and enforcing smoke free zones, enforcing Non-Road Mobile Machinery Low Emissions Zones, and promoting the Mayor's air pollution forecasts.
<b>London Borough of Merton AQAP 2018 – 2023</b>	
Section 4 – Merton's Air Quality Priorities	Priorities include land-use planning and sustainable development, transport, planning, climate change policies, low emission strategies, promoting health and wellbeing through Public Health Outcomes policy, and education programmes.

Policy	Summary
<b>Merton Council Local Development Framework – Core Planning Strategy 2011</b>	
Policy CS 20 – Parking Servicing and Delivery	The Council sets out a Key Driver as the Mayor's Air Quality Strategy, and although a policy does not explicitly outline air quality, Policy CS 20 uses air quality as a justification to promote the reduction in traffic levels, as a target to follow the Mayor's Transport Strategy.
<b>Mid Sussex AQAP 2021</b>	
Section 1.1. Purpose of the AQAP	The plan highlights what can be done to reduce NO <sub>2</sub> pollution surrounding the Stonepound Crossroads, Hassocks AQMA. The actions include minimising HGV movements, improve and promote cycle lanes, encourage alternate transport routes, and "Cut Engine, Cut pollution" signs.
<b>Mid Sussex District Plan 2014 – 2031</b>	
DP29: Noise, Air and Light Pollution	This policy states that developments should not "cause unacceptable levels of air pollution" and proposals should be "consistent with Air Quality Management Plans".
<b>Mid Sussex: Air Quality and Emissions Mitigation Guidance for Sussex 2021</b>	
The National Planning Policy Framework and air quality	"This guidance deals with the pollutants from transport which are regulated under the Local Air Quality Management (LAQM) regime, and the assessment and control of dust during demolition and construction". The guidance sets out the recommended assessment approach to air quality mitigation for developments and method for damage cost calculations.
<b>The Mole Valley Core Strategy 2009 – 2026</b>	
CS Policy 20: Reduced Flood Risk and Environmental Pollution	This policy ensures that development is not proposed if it "is likely to lead to a significant increase in pollution (be that to air, water or noise)".
<b>Reigate and Banstead Local Plan: Core Strategy 2014 – 2027</b>	

Policy	Summary
Policy CS9: Gatwick Airport	This policy sets out the evidence bases and consultation the council requires to "support the development of Gatwick Airport, within the existing airport boundary and existing legal limits...". The policy states consultations will be used to monitor the policy, along with use of evidence bases such as "Gatwick Airport Masterplan" to support this.
Policy CS10 Sustainable development	This policy sets a requirement for proposed developments to be designed to minimise air pollution.
<b>Reigate and Banstead Local Plan Development Management Plan 2019 – 2027</b>	
Policy DES8: Construction management	Construction management statements may be required for proposed developments under this policy. They must set out potential dust, emissions and odour impacts and mitigation measures to minimise these.
Policy DES9: Pollution and contaminated land	This policy states that developments will only be permitted if they will not result in a significant adverse impact on air quality at construction or operational periods. Where a development is proposed in an area of poor air quality (such as AQMAs), it "must be designed to minimise the occupants' or users' exposure to internal and external air pollution...", and measures to reduce air pollution are encouraged.
<b>Runnymede Borough Council AQAP 2014</b>	
Section 3.2.2 Climate Change Strategies	Surrey County Council's Climate Change Strategy has three core objectives: emission reduction, adapting to climate change and raising awareness. Core aims include to "incorporate appropriate physical measures in infrastructure schedules" as well as to consider air quality issues in the Borough as well as district led-planning processes.
Section 6 – Proposed Measures	To have focus on the monitoring and assessment of current pollution levels, as well as promoting sustainable travel. Proposed measures also include for certain developments to have Air Quality Assessments, to include assessment on

Policy	Summary
	criteria for impact significance, as well as future year projects and feasibility.
<b>Runnymede Borough Council 2020 – 2030 Local Plan</b>	
Policy EE2: Environmental Protection	The Council states that “development proposals which may give rise to adverse impacts on air quality including sources of odour or fumes... will be expected to be accompanied by an air quality assessment or odour impact study”.
<b>Sevenoaks District Council Core Strategy 2011 – 2026</b>	
Policy SP 2: Sustainable Development	The Council states that “the design and location of new development will take account of the need to improve air quality in accordance with the District’s Air Quality Action Plan. Development in areas of poor air quality or development that may have an adverse impact on air quality will be required to incorporate mitigation measures to reduce impact to an acceptable level”.
<b>Sevenoaks Town Neighbourhood Plan 2020 – 2038</b>	
Theme Three: Movement and Public Realm - Objective Eight	The Council strives to promote and encourage the use of sustainable transport models, reducing pollution levels, highlighting the need to reduce air pollution, surrounding the High Street and on London Road.
<b>London Borough of Sutton Local Plan 2016 – 2031</b>	
Policy 34: Environmental Protection	This policy sets out that “all major development proposals with potentially significant adverse impacts on air quality, located within 150m of a sensitive receptor... should be accompanied by an Air Quality Assessment...”. This is in addition to objective that “all development proposals should be at least ‘air quality neutral’ with respect to respect to particulates (PM <sub>10</sub> ) and nitrogen oxides (NO <sub>x</sub> )...”.
<b>London Borough of Sutton AQAP 2019 – 2023</b>	
Section 2.4 – Issues and Priorities	London Borough of Sutton has set out the seven themes for action: Cleaner transport, Delivery servicing and freight, Borough fleet actions, Emissions from developments and buildings,

Policy	Summary
	Public health and awareness raising, Localised solutions, and Monitoring and other core statutory duties.
<b>Tandridge District Core Strategy 2008 – 2026</b>	
Policy CSP 16 Aviation Development	Although the document states that “poor air quality is not a significant issue in Tandridge...”, it is stipulated in this policy that when referring to Gatwick Airport “the Council will oppose any expansion beyond the agreed limits that would adversely affect communities in Tandridge by way of aircraft noise or reduced air quality”.
<b>Tandridge Local Plan Part 2: Detailed Policies 2014 – 2029</b>	
DP22: Minimising Contamination, Hazards & Pollution	The policy states that “development will be permitted provided it would not have an adverse impact on health, the natural or built environment or amenity of existing or proposed uses by virtue of odour, dust and/or other forms of air pollution...”. In addition, it will not be permitted if it is “likely to suffer unacceptable nuisance...” from existing sources of these emissions.
<b>Tonbridge and Malling Borough Council Local Development Framework – Core Strategy 2007 – 2021</b>	
Policy CP1: Sustainable Development	This policy states that “the need for development will be balanced against the need to protect and enhance the natural and built environment” and that in this process, “...air quality will be preserved and, wherever possible, enhanced”.
<b>Tonbridge and Malling Borough Council AQAP 2022 – 2027</b>	
Section 1.5: Key Priorities	There are a number of policies and plans at local and regional levels to support the improvements of air quality in the Borough, including five Key Priorities. These include Air Quality Monitoring, with NO <sub>2</sub> monitored across Tonbridge and Malling using diffusion tubes and continuous monitoring, to aid in quantifying the improvements put in place to reduce emissions.
<b>Tonbridge and Malling Borough Council Regulation 18 Local Plan 2022</b>	

Policy	Summary
Section 5.9.16: Local – Pollution	The Council recognises “air pollution is associated with a number of adverse health impacts...” and notes that the main source of NO <sub>2</sub> in the Borough is road traffic, identifying the use of AQMAs can aid in the improvements of local air quality.
<b>Surrey County Council Electric Vehicle Strategy 2011 – 2026</b>	
Surrey Transport Plan: Electric Vehicle Strategy	Surrey County Council produced this document as part of a wider sustainable transport approach to the area. Through this strategy the Council hopes that a transition from conventional to electric vehicles will improve air quality in the area through reduced exhaust emissions.
<b>Surrey County Council Low Emissions Transport Strategy 2011 – 2026</b>	
Section 4 – Aim and preferred approach	The aim of the low emissions transport strategy is “to reduce polluting emissions from road transport across the county which are harmful to health and the environment, and work with partners to achieve legal compliance for air quality locally”. This will be achieved through a variety of measures such as changing travel behaviour, promoting electric vehicles and considering “...air quality issues in planning...”.
<b>Woking Local Development Document– Woking Core Strategy 2012 – 2027</b>	
Policy CS18: Transport and accessibility	The Council states that this policy will be delivered through local air quality assessments in the Borough, with an overarching objective to maintain and improve air quality.
<b>Woking Local Development Documents – Development Management Policies Development Plan Document 2016 – 2027</b>	
Policy DM6: Air and Water Quality	This plan states that “development that has the potential, either individually or cumulatively, for significant emissions to the detriment of air quality, particularly in Air Quality Management Areas... should include an appropriate scheme of mitigation...”. The Council also mentions that Air Quality Assessment should be submitted for developments that exceed criteria such as greater

Policy	Summary
	than 10 dwellings or 1,000 m <sup>2</sup> other floorspace within or adjacent to an AQMA or greater than 100 dwellings or 10,000 m <sup>2</sup> other floorspace anywhere in the Borough.
<b>Emerging Policy</b>	
<b>Consultation on Proposed Changes to Crawley's AQMA</b>	
Proposed extension to Hazelwick AQMA	Due to monitoring exceedances of NO <sub>2</sub> in an area just outside of the Hazelwick AQMA, the AQMA is proposed to be extended to "include the Three Bridges area, forming a single extended 'Crawley AQMA". This added an additional area onto the south-eastern 'arm' of the current AQMA.
<b>Draft Crawley Borough Local Plan 2021 – 2037</b>	
Policy EP5: Air Quality	This policy states that "development should help to improve air quality and enhance the environment" with background air pollution levels reduced through "sustainable design principles" of the development. With regards to odour emissions, the policy states that "where amenity sensitive development is proposed within 800 metres of a Waste Water Treatment Works an Odour Impact Assessment will be required as part of the planning application".
Strategic Policy GAT1: Development of the Airport with a Single Runway	This policy is specifically about the development of Gatwick Airport. Air quality is stated in one of the four points on which the development needs to adhere to for the council to "support the development of facilities which contribute to the sustainable growth of Gatwick Airport as a single runway, two terminal airport...". The policy states that "the impacts of the operation of the airport on the environment, including noise, air quality...are minimised, where necessary satisfactory safeguards are in place to ensure they are appropriately mitigated and, as a last resort, fair compensation is secured...".
Strategic Policy SD1: Presumption in Favour of	This policy states that "when considering development proposals the council will take a positive approach to approving development which

Policy	Summary
Sustainable Development	is sustainable". The Council will support developments that demonstrate "progress towards Crawley's commitment to being carbon neutral by 2050..." and, create and enhance availability opportunities for green infrastructure in Crawley.
<b>Horsham District Local Plan 2021 – 2038 (Regulation 19 Draft Copy)</b>	
Policy 1 – Strategic Policy: Sustainable Development	Through this policy the Council will favour development proposals that embed sustainability in their design, aligning with the National Planning Policy Framework. The Council will work with applicants to ensure development "improves the economic, social and environmental conditions in the area".
Policy 24 – Strategic Policy: Environmental Protection	This policy states that "developments will be expected to minimise exposure to and the emission of pollutants..." (including odour and air pollution) "...from all stages of development". Development proposals need to protect human health and the environment by demonstrating that they will "minimise the air pollution and greenhouse gas emissions", align with the local Air Quality Plans and objectives, and "maintain or reduce the number of people exposed to poor air quality including odour" especially for vulnerable groups.
Policy 26 – Air Quality	This policy focuses on air quality with all "major development proposals and proposals within an Air Quality Management Area (AQMA), or in relevant proximity to an AQMA" needing an "Emissions Mitigation Assessment" and "an Air Quality Impact Assessment". Through this policy the Council stipulates requirements such as proposals taking into account "The Air Quality and Emissions Mitigation Guidance for Sussex (2019)", contributing and aligning with the "local Air Quality Plans" and objectives, and ensuring appropriate cumulative impact assessment of "relevant committed developments".

Policy	Summary
<b>Future Mole Valley Draft Local Plan 2020 – 2037</b>	
Policy S5: Retaining and Investing in Natural Capital	This policy states the Council will work with various industries to protect and enhance the natural capital, by "ensuring adherence to national standards for air quality with appropriate and transparent monitoring".
Policy EN12: Pollution Control	This policy states that "development should minimise exposure to, and the emission of, pollutants including noise, odour, air and light pollution". Developments should avoid the increase of exposure to poor air quality, "particularly where vulnerable people are located". In addition, the policy states the Council will contribute towards the achievement of national air quality objectives, through mitigation.
<b>Sevenoaks District Council Draft Air Quality Action Plan (for consultation) 2021</b>	
Section 3.5 Key Priorities	The Council has stated four key priorities, these include public health and wellbeing, transport, planning and infrastructure, and policy guidance. These key priorities will aid the impact that air pollution has on public health and the local areas.
<b>Tandridge District Council Our Local Plan: 2033 (Regulation 22 submission)</b>	
TLP46: Pollution and Air Quality	This policy states that "all development proposals must be located and designed to not cause a significant adverse effect" on the health of residents, residential amenity or the environment through air pollution, odour or dust. "Development will be supported where it would not result in the national Air Quality Objectives being exceeded; and it would not lead to a significant deterioration in local air quality" with all new development proposals needing to take into account the Council's Air Quality Impact Assessment requirements.

### 3 References

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- Tonbridge and Malling Borough Council (2022) Regulation 18 Local Plan.
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- Woking Borough Council (2018) Guildford Road AQMA Air quality action plan.

## 4 Glossary

### 4.1 Glossary of Terms

**Table 4.1: Glossary of Terms**

Term	Description
AQAP	Air Quality Action Plan
AQMA	Air Quality Management Area
EIA	Environmental Impact Assessment
ES	Environmental Statement
GAL	Gatwick Airport Limited – the company which operates Gatwick Airport
GHG	Greenhouse Gas Emissions
LAQM	Local Air Quality Management
NO <sub>2</sub>	Nitrogen Dioxide
PM <sub>10</sub>	Airborne particles that have a median diameter of 10 microns
PM <sub>2.5</sub>	Airborne particles that have a median diameter of 2.5 microns
WHO	World Health Organisation