

**SURREY COUNTY COUNCIL (URN 20044665) - WRITTEN REPRESENTATION
DEADLINE 1, 12 MARCH 2024**

GATWICK AIRPORT NORTHERN RUNWAY PROJECT - PINS Reference TR020005

1. Introduction

- 1.1 Surrey County Council (SCC) is a host authority and has worked collaboratively with the other host authorities in Surrey to produce a joint local impact report: "Surrey County Council, Mole Valley District Council, Reigate and Banstead Borough Council and Tandridge District Council Joint Local Impact Report (LIR)". Following the topic themes set out in the Applicant's Environmental Statement, it details the local impacts within the county expected during the construction and operation of the Project and the mitigation measures, controls and commitments needed to address environmental impacts, particularly noise and air pollution and the negative effects on local communities were the Secretary of State to grant development consent.
- 1.2 This written representation should be considered alongside the LIR. It sets out SCC's policy position on the Gatwick Airport Northern Runway Project (the Project) and the council's view that the Project should be subject to an environmentally managed growth approach to ensure its concerns in relation to surface access and environmental impacts are satisfactorily addressed.

2. Surrey County Council resolution

- 2.1 On 16 July 2013, at Full Council, it was **RESOLVED** that:

This Council recognises the crucial role of the airports at Heathrow and Gatwick in supporting employment for Surrey residents, generating investment in the Surrey economy and in attracting and retaining major businesses to locate in the county.

Given the vital importance of these airports for the continued success of the Surrey economy, this Council opposes any proposals that would serve to reduce their capacity or the role of Heathrow as a hub airport.

This Council remains of the view that expansion at either airport would require the environmental and surface access issues involved to be satisfactorily addressed.

This Council calls on Government and the aviation industry to prioritise investment in road and rail connections to the airports to reduce congestion and overcrowding.

- 2.2 Since the above resolution was made, SCC has declared a climate change emergency, and developed a Climate Change Strategy (2020)¹ and Climate Change Delivery Plan to meet this challenge and achieve the goal of net zero carbon by 2050. The council has also produced a new Local Transport Plan (LTP4)² that aims to significantly reduce carbon emissions from transport and aims as a key principle to shift travel choices away from car use to more sustainable modes of transport, including public transport, walking, and cycling.
- 2.3 The council has considered the Applicant's proposals and in particular the need to address the environmental and surface access issues in light of the above policies. The

¹ [Surrey's Climate Change Strategy 2020](#)

² [Local Transport Plan \(LTP4\)](#)

council also has experience of working collaboratively with other local authorities in the Heathrow sub-region and with Heathrow Airport Limited on its proposals for a Northwest Runway, which included developing an environmentally managed growth approach to ensure growth took place within environmental limits. As well as Heathrow, SCC is aware of the Green Controlled Growth (GCG) approach submitted as part of the London Luton Airport Expansion Application and tested at Examination, though yet to be decided, and consider that such an approach should be developed for Gatwick.

3. Environmentally managed growth

- 3.1 The Applicant has proposed a cap on annual commercial air transport movements (ATMs) as a mechanism to control the environmental impact of the Project and proposed a number of surface access commitments (SACs) or targets to promote sustainable travel with little in the way of sanction if they aren't met. Unlike almost all other major international airports in the UK, Gatwick currently has no cap on ATMs and/or passenger numbers and therefore a total movement cap is supported in principle. However, SCC does not consider that such a cap, which is only anticipated being reached in 2047, and the SACs are robust enough in themselves to satisfactorily ensure the sustainable growth of the airport. An approach that favours environmentally lead growth would enable growth/expansion to occur within appropriate limits/once targets have been met rather than the Applicant's approach which relies on mitigation measures/measures to achieve targets after the growth/expansion has occurred.
- 3.2 For surface access, by adopting an approach similar to that of Luton Airport's GCG framework, whereby growth is only permitted after targets have been met, SCC could be confident that the outcomes described in the Environmental Statement and Transport Assessment would happen as described. Instead of the Applicant committing to achieve annualised mode share targets by the third anniversary of the commencement of dual runway operations and on an annual basis thereafter, the Applicant should not start operations until the commitments are met, with subsequent passenger growth being constrained until targets are met again. This way the same outcomes are delivered, without uncertainty, and would ensure that the impacts that have been presented are the likely worst case.
- 3.3 To monitor and control GHG emissions during the Project construction and operation, a control mechanism similar to the GCG framework would ensure the Applicant demonstrates sustainable growth while effectively managing its environmental impact. Limits and thresholds would need to be established for GHG emissions for pertinent project stages and monitoring and reporting requirements for emissions in airport operations and surface access transportation defined through such a mechanism. Any exceedances of defined limits would have implications for capacity increases at the airport.
- 3.4 SCC currently has major concerns over Gatwick's proposed noise envelope not being fit for purpose (LIR Chapter 12). As well as not providing any effective control or incentive to reduce noise levels at the Airport, suitable monitoring, governance and enforcement arrangements are lacking. Therefore, SCC proposes that a revised noise envelope should similarly be part of an environmentally managed growth approach along the lines of the GHG framework, including local authorities as part of the management process, with any breaches of limits having significant implications for the airport in terms of increasing capacity and slot allocation.
- 3.5 Air quality is integral to Luton's GCG framework and was also one of the topics Heathrow included in their proposals for environmentally managed growth. SCC considers that any environmentally managed growth framework for Gatwick includes air quality based on the appropriate UK air quality limits and thresholds.

4. Conclusion

- 4.1 SCC considers that the Applicant, in collaboration with the Gatwick local authorities, should develop an environmentally managed growth approach to address the surface access and environmental issues that would arise were the Project implemented.