



Horsham
District
Council



Gatwick Airport Northern Runway Project

Examination Ref: TR020005

Introduction to a proposal for an Environmentally Managed Growth Framework for the Gatwick Airport Northern Runway DCO.

Deadline 4: 15 May 2024

Crawley Borough Council (GATW-AFP107)

Mid Sussex District Council (20044737)

Reigate and Banstead Borough Council (20044474)

East Sussex County Council (20044514)

Horsham District Council (20044739)

West Sussex County Council (20044715)

Surrey County Council (20044665)

Tandridge District Council (GATW-S57419)

Mole Valley District Council (20044578)

1. The purpose of this submission is for the following nine Local Authorities (hereafter the "Authorities") to introduce into the Examination an outline of an Environmentally Managed Growth Framework ('The Framework'). The Framework will set environmental thresholds to sustainably manage the growth of the airport. The Authorities are Crawley Borough Council, Horsham District Council, Mid Sussex District Council, Mole Valley District Council, Reigate and Banstead Borough Council, Tandridge District Council, East Sussex County Council, Surrey County Council and West Sussex County Council.
2. The Applicant's current position is that the growth of the airport under the DCO will be subject to controls related to environmental effects in the form of:
 - an air noise envelope (requirements 15 and 16).
 - a cap of 386,000 air transport movements ("ATMs") per annum (requirement 19).
 - the Surface Access Commitments (requirement 20); and
 - a Carbon Action Plan (requirement 21).
3. The Authorities' key concern is that these requirements provide too much flexibility to allow development to proceed with only retrospective checks. Of particular concern is the lack of sanction against the Applicant should the continued growth of the airport exceed expected environmental parameters. Any negative environmental consequences would not have been assessed in the Environmental Statement and could permit non-policy compliant development to occur, which would be further exacerbated by allowing the airport to continue to expand, despite potentially missing key environmental targets.
4. Other Airports have introduced, or are looking to introduce, environmental management frameworks with the aim of controlling growth if environmental parameters are, or are likely to be, exceeded e.g. Heathrow Airport's 'Environmentally Managed Growth – Our Framework for Growing Sustainably' link: [Environmentally Managed Growth.pdf](#) and London Luton Airport Limited's 'Green Controlled Growth Framework' Link: [GCG Framework - Certified Document \(planninginspectorate.gov.uk\)](#)
5. The Authorities' proposals would likely reflect these approaches, (particularly the framework put forward by London Luton Airport Limited) to inform a bespoke proposal for Gatwick. The key elements of the Framework include:
 - a. limits on key significant environmental effects – Air Noise, Air Quality, Surface access modal share and Greenhouse Gases (excluding Scope 3 aviation GHG emissions).
 - b. a series of processes to be followed if environmental effects reach thresholds defined below these limits.

- c. ongoing monitoring of the actual environmental effects of growth at the airport.
 - d. independent oversight of environmental effects associated with the growth of the airport; and
 - e. a commitment to link growth at the airport to environmental performance.
6. The Framework approach should be overseen by an independent Environmental Scrutiny Group ("ESG") comprised of representatives from neighbouring districts and county councils and other specialist interests supported and advised by Technical Panels. Terms of Reference would need to be drawn up for the ESG and the Technical Panels and funding for their operation provided by the Applicant.
 7. The Authorities will present more detailed proposals for the key environmental impacts suggested above. Whilst much of the information and ongoing monitoring is available to develop these proposals relating to environmental impacts identified, the Authorities need, from the Applicant, additional information to develop thresholds and limits in relation to Air Noise, including:
 - for the period 2010-2019, the percentage of scheduled daytime movements that were delayed and instead occurred during the night-time.
 - for the period 2010-2019, details on uncertainties of forecast noise contours through a comparison of forecast noise contours against actual noise contours.
 - approach and departure profile and noise power distance data (ATMs have been provided but there is uncertainty around whether these are achievable).
 - corrections applied to noise power distance data for approach and departures for individual aircraft.
 - baseline SEL and LAm_{ax} used for validation of individual aircraft at each monitoring location.
 - predicted levels from ANCON for each aircraft approach and departure at each of the monitoring locations used in the validation process
 - the year and period that the data is provided for.
 - atmospheric attenuation method applied when calculating the noise contours; and
 - ground track and dispersion for baseline and northern runway proposal.
 8. Furthermore, access will be required to airport operational database for a range of data. Any access needs to be proportionate and subject to recognition of commercial sensitivity.

9. It is considered that the controls could be included in the DCO itself (e.g. by amending existing requirements or by cross-referring to a schedule of thresholds). Alternatively, the thresholds etc. could be included in a control document and a requirement could require development to be carried out in accordance with it.
10. Any disagreement concerning matters dealt with by the Framework would be resolved in accordance with Schedule 11 to the DCO (as modified to the extent necessary to reflect the terms of the Framework).
11. The Authorities will submit the Framework to the Examination as soon as possible.