Gatwick Airport Northern Runway Project

The Applicant's Response to Deadline 5 Submissions – Response to GHG Comments

Book 10

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1 Introduction

1.1 Overview

1.1.1 This document has been prepared to set out the Applicant's response to submissions received at Deadline 5 in respect to Greenhouse Gases.

2 Crawley Borough Council

2.1.1 This section sets out the Applicant's response to the points raised by Crawley Borough Council [REP5-086].

Ref	Crawley Borough Council's Response	Applicant's Response
CGG8.5.3	**Updated Position (Deadline 5):** In Deadline 4, the Applicant has provided WTT estimates for construction, ABAGO, surface access, and aviation. These updates increase the total emissions from the project between 2018 and 2050 by 3,978,000 tCO2e, representing a 19.83% increase. To contextualise these emissions against the carbon budget, the Applicant references DUKES 2023 Chapter 3: Oil and Oil Products, estimating that	Guidance from IEMA indicates that existing budgets should be used for contextualising the assessment, and the GHG assessment has further contextualised emissions within each sector beyond the period covered by existing carbon budgets. The quantification for net impact of the Project, including WTT, at a level of 0.649% has been presented as this informs the assessment of significance.

	around 36% of WTT aviation emissions occur within the UK boundary. Using this justification, the Applicant compares only this portion of aviation WTT emissions to the carbon budget, along with the WTT emissions from construction, ABAGO, and surface access. The Applicant then presents only the net impact, stating it accounts for 0.649% of the UK's 6th carbon budget, without displaying the total future impact of the airport as done in the ES. The Applicant should further forecast the percentage impact on future estimated carbon budgets using the CCC projections to estimate the project's impact on future carbon budgets to understand if it is decarbonising in line with the estimated net zero trajectory.	Including WTT within the evaluation of emissions across the whole airport would include the contribution to carbon budgets as follows: • Fourth carbon budget: 0.171% (vs 0.144% presented in ES) • Fifth carbon budget: 0.161% (vs 0.139% presented in ES) • Sixth carbon budget: 3.383% (vs 3.136% presented in ES) This incorporates the assumption relating to the proportion of aviation fuel imported to the UK. The CCC projections do not reflect the level that future budgets will actually be set at. On this basis there is no appropriate detail which would support an assessment against carbon budgets beyond 2038.
CGG10.5.3	Updated position is as for CGG8.5.3 above.	See response to CGG8.5.3 above.
CGG14	Updated position is as for CGG8.5.3 above.	See response to CGG8.5.3 above.

CGG16	To monitor and control GHG emissions during the project construction and operation it is suggested a control mechanism to similar to the Green Controlled Growth Framework submitted as part of the London Luton Airport Expansion Application, is provided. Implementing such a framework would make sure that the Applicant demonstrates sustainable growth while effectively managing its environmental impact. Within this document, the Applicant should define monitoring and reporting requirements for GHG emissions for the Applicant's construction activities, airport operations and surface access transportation. Similar to the London Luton Airport Green Controlled Growth Framework, emission limits and thresholds for pertinent project stages should be established. Should any exceedances of these defined limits occur, the Applicant must cease project activities. Where appropriate the Applicant should undertake emission offsetting in accordance with the Airport Carbon Accreditation Offset Guidance Document to comply with this mechanism. In addition, and where	Please refer to Deadline 5 Submission - 10.38 Appendix B - Response to the JLAs' Environmentally Managed Growth Framework Proposition Version 1 [REP5-074]. With regards to offsetting, GAL has been carbon neutral since 2017. Carbon neutrality is recognised through the ACI Airport Carbon Accreditation scheme (ACA) with offsets bought covering Scope 1 and Scope 2 GHG emissions (as well as business travel). GAL is currently accredited at Level 4+ of ACA and is committed to maintaining this. To maintain ACA accreditation, GAL can only purchase offsets that are aligned to schemes recognised by the ACA. Further details are set out in the ACA Offsetting Guidance[1]. As GAL transitions from carbon neutral to net zero status, absolute carbon reductions are being achieved. Consequently, residual emissions, and the amount of offsets required, are reducing. For net zero only removal offsets are allowed. GAL is in the process of transitioning from reduction to removal offsets. For

[1] https://www.airportcarbonaccreditation.org/wp-content/uploads/2023/12/ACA-Offset-Guidance-Document-FINAL-09112023-2.pdf

	reasonably practical, the airport will seek to utilise local offsetting schemes that can deliver environmental benefits to the area and local community around the airport. Offsets should align with the following key offsetting principles i.e. that they should be additional in that would not have occurred in the absence of the project ▪ monitored, reported and verified ▪ permanent and irreversible ▪ without leakage in that they don't increase emissions outside of the proposed development ▪ Have a robust accounting system to avoid double counting and ▪ Be without negative environmental or social externalities.	2023, GAL bought 25% removal offsets and 75% reduction offsets. GAL provided an offsetting statement in the 2023 Decade of Change Performance Summary[2]: Currently GAL buys offsets annually in arrears from the voluntary carbon market (VCM). GAL is investigating developing a local removal offsetting project which would, ideally, provide all offsets from 2030. It should be noted that any local offsetting scheme will have to be accredited by an ACA recognised scheme. Further information was given in GAL's response to Action Point 13 following ISH6 in The Applicant's Response to Actions ISH6: Climate Change (including Greenhouse Gases) [REP4-036].

[2] https://www.gatwickairport.com/company/reports/sustainability-reports.html

3 East Sussex County Council

3.1.1 This section sets out the Applicant's response to the points raised by East Sussex County Council [REP5-089].

Ref	East Sussex County Council's Response	Applicant's Response
18	In Deadline 4, the Applicant has provided WTT estimates for construction, ABAGO, surface access, and aviation. These updates increase the total emissions from the project between 2018 and 2050 by 3,978,000 tCO2e, representing a 19.83% increase. To contextualise these emissions against the carbon budget, the Applicant references DUKES 2023 Chapter 3: Oil and Oil Products, estimating that around 36% of WTT aviation emissions occur within the UK boundary. Using this justification, the Applicant compares only this portion of aviation WTT emissions to the carbon budget, along with the WTT emissions from construction, ABAGO, and surface access.	See response to CGG8.5.3 above.

	The Applicant then presents only the net impact, stating it accounts for 0.649% of the UK's 6th carbon budget, without displaying the total future impact of the airport as done in the ES. The Applicant should further forecast the percentage impact on future estimated carbon budgets using the CCC projections to estimate the project's impact on future carbon budgets to understand if it is decarbonising in line with the estimated net zero trajectory.	
21	The Applicant should demonstrate how they will provide sufficient charging provide infrastructure within the Airport to support the anticipated uptake of electric vehicles anticipated in the Government's Transport Decarbonisation Plan. Charging facilities in the surrounding area may be overwhelmed if there is insufficient charging available at the airport. and provide electric vehicle charging infrastructure. Additionally, to support this movement, the Applicant should support a Green Bus Programme such as the expansion of the network of hydrogen buses	A response to comments relating to charging infrastructure was provided in response to point C6 within the Deadline 4 response to East Sussex County Council [REP5-072]. With regards to support for low carbon bus transport, see response to MV42 below.

	used in the Gatwick/Crawley area into Mid Sussex with accompanying infrastructure	

4 Horsham District Council

4.1.1 This section sets out the Applicant's response to the points raised by Horsham District Council [REP5-092].

Ref	Horsham District Council's Response	Applicant's Response
8.1	The Applicant should update the GHG Assessment to adequately consider the risk of the UK Aviation Jet Zero strategy and the cumulative impact of the Project.	The Applicant does not consider that it is necessary to do so in circumstances where the UK Government has acknowledged that there are risks in the delivery of individual policy measures but committed to achieving the trajectory, and following successive reviews to bringing forward measures as required in order to ensure it is achieved.
8.4	To monitor and control GHG emissions during the project construction and operation it is suggested a control mechanism to similar to the Green Controlled Growth Framework submitted as part of the London Luton Airport Expansion Application, is provided. Implementing such a framework would make sure that the Applicant demonstrates sustainable growth while effectively managing its environmental impact. Within	See response to CGG16 above.

	this document, the Applicant should define monitoring and reporting requirements for GHG emissions for the Applicant's construction activities, airport operations and surface access transportation. Similar to the London Luton Airport Green Controlled Growth Framework, emission limits and thresholds for pertinent project stages should be established. Should any exceedances of these defined limits occur, the Applicant must cease project activities. Where appropriate the Applicant should undertake emission offsetting in accordance with the Airport Carbon Accreditation Offset Guidance Document to comply with this mechanism. In addition, and where reasonably practical, the airport will seek to utilise local offsetting schemes that can deliver environmental benefits to the area and local community around the airport. Offsets should align with the following key offsetting principles i.e. that they should be additional in that would not have occurred in the absence of the project ▪ monitored, reported and verified ▪ permanent and irreversible	

	▪ without leakage in that they don't increase emissions outside of the proposed development ▪ Have a robust accounting system to avoid double counting and ▪ Be without negative environmental or social externalities.	

5 Joint Local Authorities

5.1.1 This section sets out the Applicant's response to the points raised by the Joint Local Authorities [REP5-093] and [REP5-094].

Ref	Joint Local Authorities' Response	Applicant's Response
10.1.1	Under Section 3.1.1 [REP4-032], it is noted that the Applicant has assessed the emissions from the Project in the context of the UK's 13 existing carbon budgets (4th, 5th, and 6th), suggesting that there is sufficient "headroom" to accommodate aviation emissions.	It is agreed that the contextualisation is against 4th, 5th, 6th carbon budgets. The assessment does not discuss headroom within these budget periods.
10.1.2	To evaluate the Project's impact on future carbon budgets and the UK's net zero trajectory beyond the 2037 6th carbon budget, it is recommended that the	See response to CGG8.5.3 above.

	Applicant uses the Climate Change Committee's (CCC) net zero pathway. This will help determine if there is adequate "headroom" for the Project's emissions in future carbon budgets up until 2050. This recommendation is in line with the 2024 National Networks National Policy Statement, which states under Section 5.39 “Where it provides useful context, applicants may wish to compare their scheme emissions against carbon budgets, net zero and the UK Nationally Determined Contribution”.	
10.1.3	Additionally, the ES notes that the Applicant uses the Jet Zero Residual Emissions Trajectory to contextualise aviation emissions up to 2050. However, the Applicant does not proportionally show the impact of the Project on the Jet Zero Trajectory in the context of all UK airport expansions. Therefore, it is recommended that the Applicant estimates how the Project proportionally fits into the Jet Zero Residual Emissions Trajectory to determine if it exceeds the trajectory or not.	The Jet Zero trajectory is not intended to reflect the rate of reduction of emissions from each individual airport – it represents the aviation sector emissions for the UK. The UK Government has set this trajectory as a means of managing ongoing emissions from aviation at a sectoral level.
10.1.4	In accordance with Section 6 and the IEMA GHG Assessment guidance referenced in the	See responses to 10.1.1 and 10.1.2 above.

	Environmental Statement (ES), the Applicant must contextualise the Project's emissions against relevant carbon budgets. Currently, the Applicant has only used the UK's carbon budgets up to the 6th budget, which ends in 2037. This does not demonstrate the impact of the Project on the UK's net zero trajectory up to 2050. Therefore, the Applicant is required to use the CCC net zero pathway beyond 2037 to assess if the Project aligns with the UK's net zero trajectory.	

6 Kent County Council

6.1.1 This section sets out the Applicant's response to the points raised by Kent County Council [REP5-097].

Ref	Kent County Council's Response	Applicant's Response
10	As previously raised by the Gatwick Airport Consultative Committee (GATCOM), KCC request a carbon reduction trajectory be set, a process by which progress can be independently monitored and remedial action taken if reduction targets are not being met.	It is not the role of the Applicant to assess the viability or deliverability of the Jet Zero Strategy. UK Government has committed to achieving the trajectory, and bringing forward measures as required in order to ensure it is achieved.

	Updated position (V2): KCC's previous request is maintained. Clarification must be provided by Gatwick Airport Limited as to whether the impact on society of extra emissions generated from the Project has been calculated. KCC also require further detail regarding how the proposals comply with the Climate Change Committee's recommendations. **Updated position (V3)**: Further clarification is required from the Applicant that the Jet Zero 'high ambition' scenario has been assessed and deemed viable by the Climate Change Commission.	

7 Mid Sussex District Council

7.1.1 This section sets out the Applicant's response to the points raised by Mid Sussex District Council [REP5-099].

Ref	Mid Sussex District Council's Response	Applicant's Response
23	In Deadline 4, the Applicant has provided WTT estimates for construction, ABAGO, surface access, and aviation. These updates increase the total	See response to CGG8.5.3 above.

	emissions from the project between 2018 and 2050 by 3,978,000 tCO2e, representing a 19.83% increase. To contextualise these emissions against the carbon budget, the Applicant references DUKES 2023 Chapter 3: Oil and Oil Products, estimating that around 36% of WTT aviation emissions occur within the UK boundary. Using this justification, the Applicant compares only this portion of aviation WTT emissions to the carbon budget, along with the WTT emissions from construction, ABAGO, and surface access. The Applicant then presents only the net impact, stating it accounts for 0.649% of the UK's 6th carbon budget, without displaying the total future impact of the airport as done in the ES. The Applicant should further forecast the percentage impact on future estimated carbon budgets using the CCC projections to estimate the project's impact on future carbon budgets to understand if it is decarbonising in line with the estimated net zero trajectory.	

24	To monitor and control GHG emissions during the project construction and operation it is suggested a control mechanism to similar to the Green Controlled Growth Framework submitted as part of the London Luton Airport Expansion Application, is provided. Implementing such a framework would make sure that the Applicant demonstrates sustainable growth while effectively managing its environmental impact. Within this document, the Applicant should define monitoring and reporting requirements for GHG emissions for the Applicant's construction activities, airport operations and surface access transportation. Similar to the London Luton Airport Green Controlled Growth Framework, emission limits and thresholds for pertinent project stages should be established. Should any exceedances of these defined limits occur, the Applicant must cease project activities. Where appropriate the Applicant should undertake emission offsetting in accordance with the Airport Carbon Accreditation Offset Guidance Document to comply with this mechanism. In addition, and where reasonably practical, the airport will seek to utilise	See response to CGG16 above.

	local offsetting schemes that can deliver environmental benefits to the area and local community around the airport. Offsets should align with the following key offsetting principles i.e. that they should be additional in that would not have occurred in the absence of the project ▪ monitored, reported and verified ▪ permanent and irreversible ▪ without leakage in that they don't increase emissions outside of the proposed development ▪ Have a robust accounting system to avoid double counting and ▪ Be without negative environmental or social externalities.	

8 Mole Valley District Council

8.1.1 This section sets out the Applicant's response to the points raised by Mole Valley District Council [REP5-102].

Ref	Mole Valley District Council's Response	Applicant's Response
MV09	To monitor and control GHG emissions during the project construction and operation it is suggested a control mechanism to similar to the Green Controlled Growth Framework submitted as part of	See response to CGG16 above.

	the London Luton Airport Expansion Application, is provided. Implementing such a framework would make sure that the Applicant demonstrates sustainable growth while effectively managing its environmental impact. Within this document, the Applicant should define monitoring and reporting requirements for GHG emissions for the Applicant's construction activities, airport operations and surface access transportation. Similar to the London Luton Airport Green Controlled Growth Framework, emission limits and thresholds for pertinent project stages should be established. Should any exceedances of these defined limits occur, the Applicant must cease project activities. Where appropriate the Applicant should undertake emission offsetting in accordance with the Airport Carbon Accreditation Offset Guidance Document to comply with this mechanism. In addition, and where reasonably practical, the airport will seek to utilise local offsetting schemes that can deliver environmental benefits to the area and local community around the airport. Offsets	

	should align with the following key offsetting principles i.e. that they should be additional in that would not have occurred in the absence of the project ▪ monitored, reported and verified ▪ permanent and irreversible ▪ without leakage in that they don't increase emissions outside of the proposed development ▪ Have a robust accounting system to avoid double counting and ▪ Be without negative environmental or social externalities. **Updated Position (Deadline 5 - May 2024)**: It remains the Council's view that the Applicant places too much reliance on the prospect of the Government taking actions, rather than the Applicant taking ownership of the steps that it must take to ensure emission reduction. Information on sanctions and steps which will be taken by the government are unknown and may not be effective. As such, it is the Council's view that a process of growth management should be in place, to ensure	

	growth matches environmental impacts and can be offset accordingly.	
MV42	The Applicant should provide infrastructure within the Airport to support the anticipated uptake of electric vehicles and provide electric vehicle charging infrastructure. Additionally, to support this movement, the Applicant should support a Green Bus Programme such as the expansion of the network of hydrogen buses used in the Gatwick/Crawley area into Mid Sussex with accompanying infrastructure. **Updated Position (Deadline 5 - May 2024)**: Surface Access matters remain under discussion as part of the wider examination and with the highway's authorities. It remains the Council's view that the Applicant places too much reliance on the prospect of the Government taking actions, rather than the Applicant taking ownership of the steps that it must take to ensure emission reduction. Information on sanctions and steps which will be taken by the government may not be effective. As	For EV charging, see response to ESCC ref 21 above The Applicant has been providing financial support to the local bus network serving Gatwick, Crawley and the surrounding area for a quarter of a century, helping to develop the initial Fastway network, supporting service enhancements through its Sustainable Transport Fund and recently part-funding the introduction of hydrogen buses on routes to the airport. Gatwick was a funding partner with West Sussex, Surrey and Kent County Councils for the recent, successful ZEBRA2 grant funding bid from Metrobus, that secured a further £10million of funding from central Government to add 43 more hydrogen-fueled buses to the existing fleet of 20 launched in 2023. Gatwick is committed to sustainable and low emission transport and will continue to support the local bus network, in accordance with our Surface Access Commitments, Carbon Action Plan and Decade of Change. As set out in other responses the Applicant does not agree with the Council's position in respect of managed

	such, it is the Council's view that a process of growth management should be in place, to ensure growth matches environmental impacts and can be offset accordingly.	growth and asserts that the Surface Access Commitments is the correct and proportionate response to delivering against surface transport targets.

9 National Highways

9.1.1 The Applicant is currently in discussion with National Highways about how to appropriately resolve outstanding comments and will update the examination on the position, and any additional information necessary, at the earliest opportunity.

10 Reigate and Banstead Borough Council

10.1.1 This section sets out the Applicant's response to the points raised by the Reigate and Banstead Borough Council [REP5-110].

Ref	Reigate and Banstead Borough Council's Response	Applicant's Response
68	**Updated position (Deadline 5)**: In Deadline 4, the Applicant has provided WTT estimates for construction, ABAGO, surface access, and aviation. These updates increase the total emissions from the	See response to CGG8.5.3 above.

	project between 2018 and 2050 by 3,978,000 tCO2e, representing a 19.83% increase. To contextualise these emissions against the carbon budget, the Applicant references DUKES 2023 Chapter 3: Oil and Oil Products, estimating that around 36% of WTT aviation emissions occur within the UK boundary. Using this justification, the Applicant compares only this portion of aviation WTT emissions to the carbon budget, along with the WTT emissions from construction, ABAGO, and surface access. The Applicant then presents only the net impact, stating it accounts for 0.649% of the UK's 6th carbon budget, without displaying the total future impact of the airport as done in the ES. The Applicant should further forecast the percentage impact on future estimated carbon budgets using the CCC projections to estimate the project's impact on future carbon budgets to understand if it is	

	decarbonising in line with the estimated net zero trajectory.	

11 Surrey County Council

11.1.1 This section sets out the Applicant's response to the points raised by Surrey County Council [REP5-112].

Ref	Surrey County Council's Response	Applicant's Response
78	To monitor and control GHG emissions during the project construction and operation it is suggested a control mechanism to similar to the Green Controlled Growth Framework submitted as part of the London Luton Airport Expansion Application, is provided. Implementing such a framework would make sure that the Applicant demonstrates sustainable growth while effectively managing its environmental impact. Within this document, the Applicant should define monitoring and reporting requirements for GHG emissions for the Applicant's construction activities, airport operations and surface access transportation. Emission limits and thresholds for pertinent project stages should be	See response to CGG16 above.

	established. Should any exceedances of these defined limits occur, growth should be halted.	

12 West Sussex County Council

12.1.1 This section sets out the Applicant's response to the points raised by West Sussex County Council [REP5-116].

Ref	West Sussex County Council's Response	Applicant's Response
64	To monitor and control GHG emissions during the project construction and operation it is suggested a control mechanism to similar to the Green Controlled Growth Framework submitted as part of the London Luton Airport Expansion Application, is provided. Implementing such a framework would make sure that the Applicant demonstrates sustainable growth while effectively managing its environmental impact. Within this document, the Applicant should define monitoring and reporting requirements for GHG emissions for the Applicant's construction activities, airport operations and surface access transportation.	See response to CGG16 above.

	Similar to the London Luton Airport Green Controlled Growth Framework, emission limits and thresholds for pertinent project stages should be established. Should any exceedances of these defined limits occur, the Applicant must cease project activities. Where appropriate the Applicant should undertake emission offsetting in accordance with the Airport Carbon Accreditation Offset Guidance Document to comply with this mechanism. In addition, and where reasonably practical, the airport will seek to utilise local offsetting schemes that can deliver environmental benefits to the area and local community around the airport. Offsets should align with the following key offsetting principles i.e. that they should be: ▪ additional in that would not have occurred in the absence of the project ▪ monitored, reported and verified ▪ permanent and irreversible ▪ without leakage in that they don't increase emissions outside of the proposed development ▪ Have a robust accounting system to avoid double counting and	

	▪ Be without negative environmental or social externalities.	