



# Gatwick Airport Northern Runway Project

## Odour Monitoring and Management Plan – Clean Version

### Book 10

VERSION: 3.0

DATE: AUGUST 2024

Application Document Ref: 10.57

PINS Reference Number: TR020005

## 1 Introduction

### 1.1. Background

- 1.1.1 The Applicant has received submissions from Local Authorities in relation to odour, including within the review of the Gatwick Airport Limited (GAL) Northern Runway Project Draft Air Quality Action Plan (AQAP) at Deadline 4 [\[REP4-053\]](#).
- 1.1.2 The Applicant responded to points in relation to odour within Appendix A of **The Applicant's Response to Deadline 4 submissions submitted at Deadline 6** [\[REP6-090\]](#). In addition, the Applicant provided a response on the Odour Management and Monitoring Plan at Action Point 27 of **The Applicant's Response to Actions ISH8 – Draft DCO** [\[REP6-089\]](#).
- 1.1.3 The ES concluded the residual effect of odour due to the Proposed Development was not significant, as reported in section 13.10 of **ES Chapter 13: Air Quality** [\[REP3-018\]](#).

### 1.2. Purpose of this Document

- 1.2.1 This plan describes the proposed methodology for the odour reporting system referenced in the draft AQAP contained in Appendix 5 of the **Draft Section 106 Agreement** [\[REP6-063\]](#):

*“Manage and promote the system to record odour complaints and review the record of odour complaints on a regular basis, respond and identify any new actions required.”*

- 1.2.2 The purpose of this plan is to set out a proposed odour reporting process which will be followed by GAL in the event that complaints are received by GAL, along with the actions to be taken GAL.
- 1.2.3 Given the air quality assessment predicts no significant impacts [\[REP3-018\]](#), any odour issues that arise are expected to be related to abnormal operations or temporary conditions. This plan commits to reviewing any odour issues that arise, investigating the cause of the issue and taking action, following best practice.
- 1.2.4 The plan includes procedures for monitoring, recording and reporting on odour emissions specifically referring to the operation of the airport from the point at which dual runway operations have commenced.

- 1.2.5 Any construction related odours as a result of the Project would be managed in accordance with the **Code of Construction Practice (CoCP)** [[REP4-007](#)].

## 2 Odour Complaints

- 2.1.1 Complaint information is useful data for assessing the odour environment of an area, however, it does have its limitations (as reported by the Environment Agency<sup>1</sup> and research<sup>2</sup>). There are currently no established criteria for determining how significant the number of complaints received are for a site. It should also be noted that research<sup>2</sup> suggests that complaints increase when the profile of a site has been raised, for example when a new planning application is made or following an incident at a site.
- 2.1.2 Odour is typically due to a mixture of substances in the air. Typically, airport related odour is anecdotally linked to jet fuel or the burning of jet fuel as a result of aircraft activity. The potential airport activities that could be linked with odour emissions include:
- fugitive jet fuel emissions from apron and fuel farm activities;
  - aircraft activity (engine testing, landing and take-off (LTO) cycle);
  - On-Airport Wastewater Treatment Works; and
  - fire training ground activities.
- 2.1.3 Quantifying odour risk is challenging due to the varied sources and subjective nature of odour impacts. Equally, the measurement of odour is challenging as the chemical compounds are often at concentrations below the detection limit of instruments.

### 2.2. Odour Complaints Process

- 2.2.1 At present, odour complaints received by GAL are managed through the existing Customer Services complaints process.
- 2.2.2 The current system operates well. Under the Project, it is proposed that future odour complaints will be captured through the same Customer Services complaints process.

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<sup>1</sup> Environment Agency (2002) Assessment of Community Response to Odorous Emissions [Microsoft Word - LP3-ENAG00A27.doc \(publishing.service.gov.uk\)](#)

<sup>2</sup> Bull, MA and Fromant, EL. The performance of numerical odour assessment for the prediction of complaints from wastewater treatment works. Water and Environment Journal, March 2013

2.2.3 The odour complaints process set out would apply for residents at Horley Gardens Estate, along with other local communities, and any warranted investigation would be carried out in these locations.

2.2.4 The following six step process would be followed.

- Step 1 – Stakeholder submits odour complaint to Gatwick Customer Services.
- Step 2 – Odour complaint categorised by Customer Services in the 'Environment-Odour' category.
- Step 3 – Customer Services seek further information by asking the complainant the following questions:
  - The location of the odour being experienced
  - The intensity
  - The nature of the odour (fuel, chemical etc)
  - The duration of the odour
  - The time of day.
- Step 4 – Customer Services pass details of the complaint to the Health, Safety and Environment (HSE) team at GAL for investigation and action:
  - Review: undertake a review of the complaint and any relevant airport related activity at the time and in the vicinity of the complaint to consider if it indicates airport activity as the source (e.g. unusual aircraft activity, fuel spill, fire training).
  - Investigation: should the review suggest further investigation is required, undertake appropriate monitoring. In most cases this would take the form of sniff testing or an odour diary (methodology detailed in H4 guidance) to help provide a longer term view of odour for a particular location or resident or business (e.g. over 2-3 weeks).
  - Analysis: review of complaint incident and sniff testing/odour diary against airport activities, flight schedules, fuel refuelling and meteorological conditions.
  - Action: put in place any actions required in response to the investigation.
  - Reporting: respond to complainants with feedback in a timely manner. Annually report (if required, i.e. based on number of complaints received) with relevant details of the complaints received and analysis undertaken and share with relevant local authorities at the Annual Air Quality Joint Authorities Meeting, if requested.

- Step 5 – The HSE team will be expected to support the Customer Services team in providing a response to the complaint.
- Step 6 – Odour complaints received through the Noise and Track Keeping system should be passed to the Customer Services team, such that they can be logged and managed in line with the process above.

### 3 Odour Reporting Process

- 3.1.1 The draft AQAP set out Appendix 5 of the **Draft Section 106 Agreement** [[REP6-063](#)] sets out contextual information and an outline and description of the content of AQAPs to be submitted every five years under Schedule 1 of draft DCO s106 agreement.
- 3.1.2 The AQAPs to be submitted every five years will include the Applicant's reporting on odour related complaints. Odour will also be discussed at the air quality meetings with the Local Authorities which are secured through Schedule 1 of the **draft DCO s106 Agreement** [[REP6-063](#)].

### 4 Air Quality Monitoring

- 4.1.1 Section 4 of draft AQAP set out Appendix 5 of the **Draft DCO s106 Agreement** [[REP6-063](#)], sets out details on Air Quality Monitoring to be secured through Schedule 1 of the **Draft DCO s106 Agreement**. In addition to the current monitoring setup, GAL will provide an extended monitoring network onsite.
- 4.1.2 The air quality monitoring will be beneficial for understanding the changes in emissions across Gatwick Airport. Tools such as Openair<sup>3</sup> could be used to review conditions and sources of emissions to indicate possible sources and risks based on meteorological conditions. The data will support odour review processes to help identify potential source(s) of odour and feed into any considerations for mitigation where required.

### 5 Conclusion

- 5.1.1 The proposed process in this note has been developed to be proportionate and robust in the context of existing assessment results and concerns raised by stakeholders.

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<sup>3</sup> Defra, UK Air, Air Information Resource, Data, Data archive, Openair – data analysis tool: <https://uk-air.defra.gov.uk/data/openair>