



George Harrold
NSIP Case Manager
National Infrastructure Planning
The Planning Inspectorate
Temple Quay House
2 The Square
Bristol
BS1 6PN

Growth, Environment & Transport

Room 1.62
Sessions House
Maidstone
Kent
ME14 1XQ

Email:

██████████@kent.gov.uk

BY ONLINE SUBMISSION ONLY

Your Reference:
TR020005

Date: 27th October 2023

Dear George,

RE: Application by Gatwick Airport Limited for an Order Granting Development Consent for the Gatwick Airport Northern Runway Project – Kent County Council’s Updated Principal Areas of Disagreement Summary Statement (PADSS)

Following the Examining Authority’s request for a Principal Areas of Disagreement Summary Statement (PADSS), as outlined within the ‘Notification of Procedural Decisions’ letter [PD-005], please find enclosed the first iteration of Kent County Council’s (KCC) Principal Areas of Disagreement Summary Statement (PADSS) Tracker.

This document has been created to reflect the position of KCC at the Pre-examination stage and the matters raised will be updated and expanded on in the subsequent Local Impact Report and/or Written Representation to be submitted in the Examination period.

Our current principal areas of disagreement relate to:

- Surface access (Coach and Rail connections)
- Noise
- Carbon emissions
- Socio-economic impacts and the need for the scheme

KCC looks forward to working with the Applicant and the Planning Inspectorate as the project progresses through the DCO process and would welcome the opportunity to comment on matters of detail throughout the Examination.

Should you require any further information or clarification, please do not hesitate to contact me.

Yours sincerely,

Simon Jones

Corporate Director – Growth, Environment and Transport

Principal Areas of Disagreement Summary Statement – Kent County Council (Version 1 - 27/10/2023)

Ref	Principal Issue in Question	The brief concern held by Kent County Council which will be reported on in full in the Written Representation/Local Impact Report	What needs to; change, or be included, or amended in order to satisfactorily address the concern	Likelihood of the concern being addressed during Examination
1	Surface Access - Public Transport	Kent County Council (KCC) support the inclusion of regional coach services to locations in Kent and Medway within the proposals. However, KCC is concerned that Route 4 will not extend to Ebbsfleet as first proposed and will no longer extend into Kent, instead stopping at Bexley. KCC feel this is short sighted and fails to consider the additional passengers who would be able to access Ebbsfleet from elsewhere in Kent and East London.	<p>KCC request that Route 4 be extended to Ebbsfleet International Station as originally proposed.</p> <p>Previous airport coach services have failed to be retained in Kent. As such the ongoing provision of these services should be secured within the DCO process.</p>	Possible
2	Surface Access - Rail Connections	Improving transport connections to Gatwick from Kent has not been sufficiently addressed, particularly to bring forward initiatives to serve passengers & staff accessing the airport from areas in Kent by rail. There is a need for Gatwick Airport Limited (GAL) to actively support the need to extend the rail service to Canterbury West via Redhill, Tonbridge, and Ashford, with a possible link to the existing service between Gatwick & Reading. This would help widen the economic benefits of the airport to Kent.	<p>KCC understands that the possibility of direct rail services has been discussed but has not been brought forward as part of the assessment. KCC is disappointed with this approach.</p> <p>We accept that unfunded rail enhancements cannot be included in future planning for improved sustainable access to Gatwick Airport. However, GAL could certainly lobby for improvements and help support the case. KCC encourage GAL to continue to work with partners such as Network Rail and Train Operators on this matter.</p>	Unlikely

3	Noise - Aircraft Noise over Kent – impact on communities, the AONB and heritage sites	Areas of West Kent such as Tunbridge Wells, Edenbridge, Hever and Penshurst will be further adversely affected by overflight from Gatwick. As well as the impact on residents, this also has a heightened detrimental impact on the Area of Outstanding Natural Beauty (AONB) in terms of further loss of tranquillity, which also affects heritage assets such as Hever Castle and Penshurst Place. Despite technological advances, meaning aircraft become quieter over time, the increase in movements with the Northern Runway in routine operation will result in the noise environment around Gatwick being broadly similar to today and so the benefits of quieter aircraft would not be felt by the communities around the airport. It is noted that Chiddingstone noise levels increase slightly, despite aircraft becoming quieter overtime.	KCC understand that noise levels, even with technological advances, will continue to have adverse impacts on West Kent residents, the AONB and heritage attractions. It is unlikely that any changes to the application, unless they reduce the noise levels in Kent to below that measured in 2019, will make the proposals acceptable to KCC. As such, KCC oppose the Northern Runway Expansion.	Unlikely
4	Climate Change - Emissions	The northern runway project would have a significant material impact on the Government’s ability to meet carbon reduction targets. By 2050, routinely operating the Northern Runway would see Gatwick being responsible for 20% of the overall UK aviation carbon budget. KCC is concerned that this expansion cannot be justified in the wider context of the global requirement to reduce CO2 emissions.	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.	Possible

5	Needs Case	<p>KCC question whether the needs case for this scheme has been evaluated effectively. A review undertaken by the Gatwick Joint Local Authorities concludes that the increase in capacity attainable, and levels of usage of the Northern Runway proposals are overstated. The wider economic benefits have also been overstated. KCC concurs with this assessment and requests more detailed information related to this issue, particularly the economic case</p>	<p>KCC require more evidence to be presented to prove the need for these proposals. The forecast future demand figures to not take account of actual levels of demand and the market share of other airports in the South East with overlapping catchment areas. A consequence of over optimistic demand growth assumptions is that the Applicant has set the noise envelope too high so that there is no incentive to reduce noise as Gatwick will be operating comfortably within its noise envelope.</p>	Possible
6	Socio-economic	<p>It is the view of KCC that Kent is unfairly disadvantaged by the proposals as it receives many disbenefits from the airport (e.g. noise from overflight) and little benefit (e.g. employment and economic). We are aware that a proportion of Kent residents are employed by the airport (directly and indirectly) and that Kent charities can apply to GAL for funding, but these are not enough to outweigh the adverse health and resulting economic disbenefits of noise from overflight of West Kent.</p>	<p>KCC appreciates the work presented in the Employment Skills and Business Strategy [APP-1987]; however, currently this is too broad and does not provide enough information about how Kent (and other Local Authority areas) could benefit from the project. KCC would welcome the opportunity to discuss this plan with GAL to identify and secure specific actions that would ensure benefit to Kent residents employed at Gatwick Airport.</p>	Possible

7	Overflight - Health and Wellbeing (awakenings)	KCC has previously raised concerns about the health impacts of aircraft overflight. Areas of West Kent are regularly overflowed by arrivals to Gatwick, with aircraft turning and joining the Instrument Landing System (ILS) over Tunbridge Wells. We are aware there have been several studies that show a noise disturbance caused by overflight, especially during the night period, can result in an impact on both mental health and physical health in terms of cardiovascular diseases.	<p>Air Noise Modelling [APP 172] shows that <i>'in the Slow Transition Fleet Case, in 2032 the effect of the Project is to increase awakenings due to aircraft noise by 3,782 from 29,061 to 32,843 per night, and 526 above the 2019 base of 32,317. These figures compare to the underlying total awakening for all other reasons in the affected community of approximately 680,000 per night.'</i> KCC remains concerned about the health impacts of increased night time overflight disturbance in areas such as Edenbridge and Penshurst should the slower transition case materialise.</p> <p>KCC acknowledge that the overflight over West Kent is unlikely to be able to be reduced; however, GAL should further ensure that this area is effectively monitored, and mitigation be put in place should a slower transition case occur.</p>	Possible
8	Construction	KCC welcomes the development of a package of construction training, upskilling, and apprenticeship opportunities presented. However, KCC feels the proposals are not yet sufficient for temporary construction workers from Kent.	KCC recommends further consideration be given to the areas where temporary construction workers will be travel from. Sustainable travel plans are required to be implemented to ensure workers can get to the site but currently provide very little focus on sustainable travel from Kent.	Possible