



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

Your Reference:
TR020005

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BY ONLINE SUBMISSION ONLY

Dear George,

RE: Application by Gatwick Airport Limited for an Order Granting Development Consent for the Gatwick Airport Northern Runway Project – Relevant Representation Submission

Following the Planning Inspectorate's acceptance (3rd August 2023) of the application for a Development Consent Order (DCO) for the Gatwick Airport Northern Runway Project, Kent County Council (KCC) requests to be registered as an Interested Party at the Examination.

The routine use of the Northern Runway at Gatwick, by introducing the operation of the runway for departing aircraft, will significantly improve the aircraft movement capacity at Gatwick.

Whilst KCC understand that an increase in aircraft movements would enhance the economic benefits of the airport (through business travel, tourism, trade and increased employment, both on site and in the supply chain), routine use of the Northern Runway is strongly opposed by KCC.

KCC's Policy on Gatwick Airport, adopted by KCC Cabinet in December 2014, explicitly states that KCC opposes a second runway at Gatwick. Whilst at the time, this was in the context of the Airports Commission and the proposals for a newly constructed and independently operated second runway, we consider these latest proposals to routinely use the Northern Runway as a way for Gatwick to become a two-runway airport by another means.

In respect of this application, KCC continues to strongly oppose the proposals to bring the existing Northern Runway into routine use. KCC has contributed to the early development and planning process as part of the Gatwick Joint Local Authorities and will continue to do so. KCC's Relevant Representation focuses on areas with specific interest to Kent; however, KCC supports other points raised by the Joint Local Authorities, especially regarding Traffic and Transportation.

There are four key areas where we like the Examining Authority to focus on in the Examination:

1. Needs case

KCC questions whether the needs case for this scheme has been evaluated effectively. A review undertaken by the 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.

2. Carbon emissions

KCC believes the Northern Runway project would have a significant material impact on the Government's ability to meet carbon reduction targets and therefore should weigh against granting development consent. 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.

3. Noise from overflying aircraft

KCC has long argued the impacts of Gatwick's current single runway configuration are already unacceptable, and a potential increase of these impacts on local communities would be intolerable. Areas of West Kent such as Tunbridge Wells, Edenbridge, Hever and Penshurst are adversely affected by overflight from Gatwick. Tranquillity in the Areas of Outstanding Natural Beauty (AONBs) will be further negatively impacted, including at several heritage sites, e.g. 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. We advocate that this is not in keeping with the ethos of sustainable growth that is promoted in Gatwick's Master Plan.

4. Intensification of the main runway at Gatwick

Routinely using the Northern Runway would create extra capacity on the existing main runway along with allowing Gatwick the opportunity to increase the number of larger aircraft arriving and departing from the main runway. We are concerned that the intensification of the main runway is not fully assessed within these proposals and therefore the full extent to which communities and the environment will be impacted is not being properly assessed or appropriately mitigated.

5. Lack of efficient rail connections to Kent

A direct rail service from Kent to Gatwick continues to be a priority within KCC's Kent Rail Strategy 2021. Such a service could be delivered with only modest further infrastructure enhancements and could be a natural extension of the existing GWR



operated Reading – Gatwick services by extending this to Canterbury West via Redhill, Tonbridge and Ashford.

We accept that unfunded rail enhancements cannot be included in future planning for improved sustainable access to Gatwick Airport. However, Gatwick Airport Limited (GAL) could certainly lobby for improvements and help support the case. KCC encourage GAL to continue to work with partners such as Network Rail, Train Operating Companies and the Department for Transport (DfT) on this matter.

KCC will develop these concerns in our Written Representation (WR) and, where appropriate, in Issue Specific Hearings and its responses to any questions from the Examining Authority.

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