

National Infrastructure Planning
Temple Quay House
2 The Square
Bristol, BS1 6PN

Please ask for: Ellen Gilbert

Telephone: [REDACTED]

Email: [REDACTED]@tunbridgewells.gov.uk

By email to:

gatwickairport@planninginspectorate.gov.uk

Date: 12 March 2024

Dear Sirs,

Planning Act 2008 – Sections 88 and 89; and The Infrastructure Planning (Examination Procedure) Rules 2010 – Rules 4, 6, 9, 13 and 16

Application by Gatwick Airport Limited for an Order Granting Development Consent for the Gatwick Airport Northern Runway Project

Tunbridge Wells Borough Written Representation (unique reference number 20041435)

Project Description

Gatwick Airport Limited's (GAL) application is for a Development Consent Order (DCO) to enable dual runway operations at the Airport through routine use of the Northern Runway. Alterations are required to ensure the existing Northern Runway, which is currently used as an emergency runway and taxiway, is able to safely accommodate departing aircraft. GAL's proposals also include amendments to taxiways, terminals and ancillary facilities, highways and rivers; as well as temporary construction works, mitigation and other associated development.

The Project would enable the Airport to grow from approximately 46 million passengers per annum (mppa) in 2019 figures, to 80.2mppa by 2047.

Flights departing from the Northern Runway will continue to use existing flightpaths. This is until the outputs of the Future Airspace Strategy Implementation South (FASI-S) Airspace Change Process are implemented.

Tunbridge Wells Borough Council Response

In December 2021, TWBC responded to the Gatwick Northern Runway Consultation (NRP) strongly opposing the development and including the following points:

- *Tunbridge Wells is unlikely to see wider economic benefits from the growth in flights and capacity at Gatwick. It will however be impacted by the increased volume of aircraft and the larger aircraft that the airport is seeking to encourage. The impact of increased flights is increased air and noise pollution affecting the local population.*

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- *The Council's aspiration to reduce CO2 emissions, to net zero by 2030, is not met by the strategy being proposed by Gatwick....Aviation is recognised as both one of the most carbon-intensive forms of transport and one of the most difficult to decarbonise.*
- *It is not clear how Gatwick will achieve its shift to sustainable transport for access to the airport with or without the proposed use of the northern runway. The ambition to increase modal shift to rail will be difficult to achieve without ensuring a frequent direct rail connection via Redhill towards Tonbridge and beyond, linking with appropriate services along this alignment.*

This document now sets out Tunbridge Wells Borough Council's written representation in relation to Gatwick Airport Limited's Northern Runway Development Consent Order (DCO) application as a neighbouring authority and sets out the Council's position on the following issues.

- Needs Case
- Noise
- Climate Change
- Surface Transport
- Economic Development

In preparing this response, TWBC has liaised with Kent County Council (KCC), as our strategic transport authority. KCC will be submitting a Local Impact Report (LIR) and Written Representation to the Planning Inspectorate in relation to the impact of the proposed development on the county as a whole, with various references to Tunbridge Wells borough and the wider part of West Kent which is identified as being the area of the county most affected by the GAL proposal.

Needs Case

Tunbridge Wells Borough Council notes the questions raised in KCC's Written Representation about the Needs Case made for the proposal, in particular:

GAL's approach to calculating demand forecasts is aspirational and the 'bottom up' approach used by the Applicant does not provide sufficient evidence to support the claimed increase in throughput, its composition in terms of routes and the future airline fleet of aircraft, or test the implications of more capacity at other airports.

One of the consequences of the approach to modelling future demand is that the Noise Envelope will have been set too large and so will provide no effective control or incentive to reduce noise levels at the airport, given that it is proposed to be set by reference to the initial noise levels, with no reduction until 2038.

A consequence of the approach to demand forecasts is that the wider economic benefits of the proposed development as set out in the Oxera report appended to the Needs Case (APP-251) have been overstated due to the failure to adequately distinguish the demand that could be met at Gatwick from the demand which could only be met at Heathrow and the economic value that is specific to operations at Heathrow. There are also concerns that the methodology by which the wider catalytic impacts in the local area has been assessed (Appendix 17.9.2 to the ES [APP-200]) is not robust and little reliance can be placed on this assessment.

Therefore, the Council does not have confidence that the decision maker can rely on the assessment of impacts to judge if the benefits of the proposal outweigh the harms.

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Intensification of the main runway

Routinely using the Northern Runway would create extra capacity on the existing main runway and therefore allow the opportunity to increase the number of larger aircraft arriving and departing from the main runway.

TWBC is concerned that the opportunity for increased use of the main runway is not fully assessed by the Applicant and therefore the full impact on the local communities that will be over-flown in the future is not known and it is not possible to plan for appropriate mitigation.

Noise

The Council's principal concern regarding the proposed Northern Runway Project is the potential noise impact of increased Gatwick flights on communities and businesses in the borough.

We refer to Kent County Council's LIR that identifies a number of adverse impacts in regard to air noise and requests further information from the Applicant, as follows:

Noise Impact A of KCC's Local Impact Report refers to the Applicant's assessment of overflight. It is not currently possible to determine the true extent of the anticipated impact of overflight as the number of overflight events are not provided, apart from landscape assessment locations chosen by the Applicant. However, it is clear from the figures provided that areas within West Kent would experience a worsening of overflight. Further detail is needed for local authorities to understand the true extent of overflight impacts on communities on the ground.

In addition, the Applicant's application provides no clarity on how the Northern Runway Project will impact arriving aircraft at Gatwick. Further clarification is required from the Applicant as to the breakdown of proposed arrivals and departures with the Northern Runway in routine use, and whether any increase in arrivals has been assessed. Without this assessment, the true extent of the impacts felt by communities on the ground will not be properly assessed.

KCC appreciates it is difficult to predict the need for aircraft to go-around when arriving into Gatwick. However, it should be noted that any increase in the number of air traffic movements at the airport will inevitably result in an increased chance of go-arounds. As it is not possible to estimate the number of additional go-arounds the Northern Runway Project may generate, it is not possible to understand the increased impact this will have on communities on the ground. KCC would encourage the Applicant to work with airlines to reduce the need for go-arounds as much as feasibly possible.

The Applicant has used annual noise contours to determine if extra capacity would affect noise levels during periods outside of the 92-day summer period. It is hard to draw any meaningful conclusion from the analysis of annual contours. Paragraph 14.9.139 [APP-039] identifies that, in 2032, increases in Lden contours are the same as the increase in LAeq,16h noise contours; however, Lnight contours increase by 11-12%, which is larger than the increase in LAeq,8h contours. This suggests that there is a larger increase in annual night-time movements than in the 92-day summer period.

Clarification should be provided on seasonality during the annual night-time period and whether a larger increase in contour size warrants any identification of significant effects. Furthermore, it would be helpful to understand if there are any seasonal variations in movements during other assessment years.

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Gatwick Airport Limited's proposals assume a growing fleet of quieter aircraft will be achieved over the timescales of the Project. However, in order for impacted communities on the ground to be appropriately mitigated it is imperative the proposed Noise Insulation Scheme is generous, robust and fit for purpose.

Currently the Applicant's Noise Insulation Scheme [APP-180] document provides a small-scale map of the proposed boundaries. Given Kent's distance from the airport, it is likely any eligible households will be located within the Outer Zone but it is difficult to determine from the size of the map exactly where the boundary will fall. In addition, information should be provided around which schools would be included within the Schools Insulation Scheme, along with details of other noise sensitive receptors.

Furthermore, clarity is needed as to how the Noise Insulation Scheme will be reviewed and revised following implementation of the Future Airspace Strategy Implementation South (FASI-S) Airspace Change Process which will result in a redesign of the Gatwick flight paths.

Noise Impact on Tunbridge Wells

The Council is aware that residents and businesses in the west of the borough are already impacted adversely by current flights into Gatwick, and this is a matter of significant concern. It is of greater concern that the Council is not able to currently determine the impact of the proposals on Tunbridge Wells district due to the Applicant's application failing to provide any information about aircraft noise within the borough. It is noted that, for this reason, the LIR prepared by KCC is inconclusive on its assessment of noise impact on the borough of Tunbridge Wells.

Therefore, alongside KCC, the Council requests for the Applicant to undertake further assessment to illustrate the impact of noise in Tunbridge Wells borough:

Figure 14.9.31 of APP-065 demonstrates how Tunbridge Wells will experience a significant level of overflight in 2032, however no further information is provided to enable KCC to meaningfully assess the level of impact. Furthermore, during westerly operations Tunbridge Wells is more so affected by arrivals and no information has been provided in GAL's application as the associated noise impacts with the Northern Runway in routine operation.

TWBC also agrees with KCC's concerns regarding the proposed Noise Envelope:

Noise Impact G of KCC's Local Impact Report highlighted that the noise envelope put forward by the Applicant does not fulfil the purpose for which it is intended and nor does it fulfil the majority of characteristics stated in CAP 1129. KCC requests that the Applicant undertakes further work on the noise envelope, in consultation with local authorities, to develop a robust noise envelope.

TWBC is particularly concerned about the impact of the NRP on the High Weald National Landscape (formerly Area of Outstanding Natural Beauty) which comprises more than 70% of the borough.

TWBC agrees with KCC's representation which states that:

Where possible the NRP should seek to further the purposes of the National Landscapes within the wider area, including those which aircraft overfly. Whilst it may be more appropriate for the airspace change process to address these matters, consideration needs to be given to the impact this project will have on the tranquillity of National Landscapes.

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Climate Change

Tunbridge Wells Borough Council is committed to playing its part in meeting the UK's Net Zero Target and meeting the legally binding ambitions of the Paris Agreement. The Council recognised the Climate and Biodiversity Emergency in a full council motion in 2019.

Declaration here: <https://democracy.tunbridgewells.gov.uk/mgAi.aspx?ID=26351>

Aviation is recognised as both one of the most carbon-intensive forms of transport and one of the most difficult to decarbonise. As well as its' CO₂ impact, aviation also has a significant non-CO₂ climate impact, the extent of this impact is as yet not fully understood and further research in this area is ongoing. (Climate Change Committee - Progress in reducing emissions 2021 Report to Parliament). This means that aviation could well be the largest contributor to UK greenhouse gas emissions by 2050, particularly as demand is expected to grow. (Aviation, Decarbonisation, and Climate Change, House of Commons Library Research Briefing – September 2021).

The Climate Change Committee (CCC) advice in the Sixth Carbon Budget and confirmed in their 2023 progress report also states; that there should be no net expansion of UK airport capacity, unless the sector carbon intensity is on track to sufficiently outperform the government's aviation emissions trajectory and thus can accommodate the additional demand. Currently, UK policy is not consistent with this outcome.

Therefore, based on the lack of clarity and ability to meet the required emissions trajectory pathway as set out by the CCC, the proposed expansion at Gatwick by bringing the Northern Runway into permanent use has not been justified by the Applicant.

It is important that the proposal does not jeopardise the UK's ability to meet the Paris Agreement's goal of holding the increase in the global average temperature to well below 2°C above pre-industrial levels and pursuing efforts to limit the temperature increase to 1.5°C temperature limit.

The Council notes the Applicant's focus on how the NRP aligns with the Government's Jet Zero Strategy but wishes to see further clarity on how the proposal complies with the Climate Change Committee's recommendations. In particular, the Council wishes to know if the impact of the Northern Runway Proposal on the Sixth Carbon Budget has been calculated.

TWBC supports the Written Representation made by KCC as follows:

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.

Surface Transport

The Council notes the ambitious target for a public transport mode share of 55% to and from the airport, including a significant increase in air passenger coach services proposed for Kent. However, we also note that KCC has requested an additional modelling sensitivity test to ascertain what the implications of a lower public transport mode share of 45% (2019 levels) would be for the county as a whole.

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Rail links to Gatwick from West Kent are currently inadequate and a direct link from Tonbridge – Gatwick is a long-held aspiration of TWBC (as well as West Kent partners Tonbridge & Malling and Sevenoaks and KCC). This priority is set out in the Council's Economic Development Strategy and is also a priority in Kent County Council's 2021 Kent Rail Strategy. The service could then link on through Kent to Ashford and Canterbury, bringing a significant benefit to the county as a whole.

TWBC has attended recent meetings with Network Rail regarding work to explore the potential for improved services between Tonbridge and Gatwick via Redhill, but we understand that there are currently no plans to take this work forward. Therefore, TWBC would encourage GAL to lobby Network Rail and the Department of Transport on this matter.

TWBC notes the proposed new Royal Tunbridge Wells-East Grinstead-Gatwick coach service and supports improved coach links to the Airport. However, it is assumed that this would be routed via the A264; a narrow, rural, single-carriageway road which KCC (as the local highway authority) deems unsuitable for such a service as it could have negative impacts for other drivers and local residents on this route.

KCC has stated that the route between Royal Tunbridge Wells and Gatwick is likely to be faster via the A21, M25 and M23 – a route which could also link Tonbridge, a catchment of comparable population to Royal Tunbridge Wells, while East Grinstead is already served by the Uckfield-East Grinstead-Gatwick coach service and local buses.

Economic Development

The visitor economy is a vital part of the overall local economy in Tunbridge Wells as set out in the Council's 2023 Economic Development Strategy. The 2021 Economic Impact of Tourism Report (derived from the Cambridge Model) calculated that the value of the visitor economy in the borough was £191m, supporting 4,505 local jobs. There were 3.6m visitors to the borough in 2021, which was a 44.4% increase on 2020.

TWBC therefore recognises the importance of transport links to the UK for international tourism as well as surface transport links from the airport. However, the success of the borough's visitor economy relies on the beauty of the natural environment, particularly the High Weald National Landscape.

The Applicant's proposal is likely to have a negative impact on the visitor economy businesses in the west of the borough and those in neighbouring districts such as Penshurst Place and Hever Castle that are also important attractions for visitors that come to Tunbridge Wells.

TWBC recognises that there may be some potential economic benefits (employment and skills development), that growth at Gatwick could bring to the south east as a whole. We would anticipate that these are likely to be more relevant to the local authority areas nearest to the airport, particularly since (as set out above) public transport links from Tunbridge Wells are poor at present.

The Council notes that the Applicant's Employment, Skills and Business Strategy (ESBS) seeks to maximise the opportunities to improve skills and employment prospects across a wide area. However, TWBC agrees with KCC that the Implementation Plan would be better secured through the DCO as opposed to a separate S106 Agreement. This is because the ambitions of the ESBS stretch further than the geographical area of which a S106 Agreement would cover and not all authorities will be party to the S106 Agreement. Therefore, TWBC asks that commitments to

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deliver on such a strategy should be secured through the DCO either in the form of a Requirement, or a control document such as a Stakeholder Actions and Commitments Register.

Overall, TWBC remains concerned that the negative impacts of the NRP will outweigh any benefits to the local economy as well as questioning if the potential benefits are overstated.

Conclusion

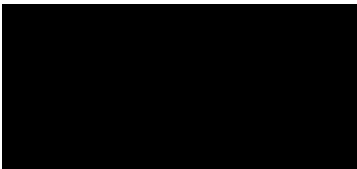
Bringing the Northern Runway into routine operation for departing aircraft will significantly increase the number of aircraft movements at Gatwick. It is far from certain if the proposal will bring positive benefits to the local economy in Tunbridge Wells. However, it is clear that the use of the runway would have an adverse impact on local communities in the west of the borough. It would particularly impact the High Weald National Landscape which is a crucial part of our visitor economy offer and which supports a significant number of local businesses and jobs.

The proposals will further contribute to carbon emissions and does not align with the Council's own carbon reduction ambitions to reach Net Zero by 2030.

Importantly, the Council is currently concerned that there are a number of aspects about the impact of the proposals that have not been adequately addressed by the Applicant, and therefore currently objects to the proposals.

I hope this response is of assistance. Please contact me if you have any questions.

Yours sincerely



Ellen Gilbert MRTPI
Planning Policy Manager
Tunbridge Wells Borough Council

Town Hall Royal Tunbridge Wells Kent TN1 1RS

switchboard 01892 526121 SMS (text) 07870 526121
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