

# **GATWICK AIRPORT NORTHERN RUNWAY**

## **Written Representation**

**Produced by Kent County Council  
(Interested Party Reference Number: 20044780)**

**12<sup>th</sup> March 2024**



## Table of Contents

<b>1. Executive Summary</b> .....	<b>1</b>
<b>2. Introduction</b> .....	<b>2</b>
<b>3. Kent County Council's Overall Position</b> .....	<b>3</b>
<b>4. Written Representation</b> .....	<b>5</b>
<b>5. Needs Case</b> .....	<b>5</b>
<b>6. Noise</b> .....	<b>9</b>
<b>7. Surface Transport (as a neighbouring Local Highway Authority)</b> .....	<b>12</b>
<b>8. Climate Change</b> .....	<b>15</b>
<b>9. Heritage Conservation</b> .....	<b>15</b>
<b>10. Socio-economics</b> .....	<b>16</b>
<b>11. Conclusion</b> .....	<b>17</b>

# 1. Executive Summary

This is a summary of the Written Representation produced by Kent County Council (KCC) as a statutory consultee and neighbouring authority. KCC's Written Representation outlines the principal representations which KCC intends to make in relation to Gatwick Airport Limited's Northern Runway Development Consent Order (DCO) application.

## Kent County Council's Overall Position

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

Whilst KCC understands 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.

The five key areas KCC has concerns relate to:

1. Needs case
2. Carbon emissions
3. Noise from overflying aircraft
4. Intensification of the main runway
5. Lack of efficient rail connections to Kent

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. KCC's Written Representation focuses on areas with specific interest to Kent; however, KCC supports other points raised by the Joint Local Authorities.

## KCC's Written Representation

KCC's Local Impact Report (LIR) identifies the positive, negative, and neutral impacts of the LTC proposals on Kent, based on our local knowledge. Our Written Representation then elaborates on the impacts identified, should Gatwick Airport Limited's needs case be correct, and proposes further assessment and mitigation for the negative impacts of routine use of the Northern Runway.

## 2. Introduction

- 2.1. For this Development Consent Order (DCO) application, Kent County Council (KCC) has been prescribed a neighbouring authority. KCC is an upper tier County Council which shares a boundary with a host authority and is therefore a statutory consultee as per Figure 4 of Advice Note Two: The role of local authorities in the development consent process. (Version 1, February 2015, The Planning Inspectorate).
- 2.2. London Gatwick Airport is the UK's second largest airport and the busiest single runway airport in Europe. The airport is the nearest international airport for most of Kent's residents and businesses, and often the airport of choice for both leisure and business travel.
- 2.3. However, the location of the Airport and the current design of flight paths means areas of West Kent, in particular Tunbridge Wells, Sevenoaks and Tonbridge and Malling, experience overflight from aircraft predominantly arriving but also departing Gatwick.
- 2.4. Proposals to routinely operate the Northern Runway are being progressed by an application for Development Consent by Gatwick Airport Limited ("the Applicant") that was accepted by the Planning Inspectorate on 3<sup>rd</sup> August 2023. If granted, the Development Consent Order ("DCO") will permit dual runway operations at the Airport through routine use of the Northern Runway, allowing the Airport to grow from approximately 46.6 million passengers per annum (mppa) in 2019 figures, to 80.2mppa by 2047.
- 2.5. Kent County Council is one of the ten Gatwick Joint Local Authorities and has engaged with the Applicant throughout the development of its proposals for the Northern Runway. KCC Officers have attended technical workshops with the Applicant, engaged in discussions regarding the Statement of Common Ground (SoCG) and submitted a Relevant Representation to the Examining Authority (RR-2422).
- 2.6. A summary of the Council's Written Representation is provided in the previous section of this document.

### **3. Kent County Council's Overall Position**

3.1. Kent County Council (KCC) has long been opposed to a potential second runway at Gatwick Airport. 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.

3.2. KCC's response to the Applicant's 2018 draft Masterplan consultation outlined in detail our concerns regarding Gatwick expanding by making best use of existing runways and the impact this would have on local communities, the environment and existing highway networks.

3.3. At Gatwick, bringing the northern runway into operation for departing aircraft will significantly increase the number of aircraft movements that the airport can handle. Whilst we 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.

3.4. The five key areas where KCC has concerns are as follows:

#### **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.

However, if Gatwick Airport Limited's assessment of the needs case is correct and they are able to achieve the anticipated growth, then we are concerned the anticipated use of the northern runway would have the following impacts:

#### **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 National Landscapes (formerly 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.

## 4. Written Representation

4.1. This Written Representation elaborates on the points raised within our Relevant Representation (RR-2422) and Local Impact Report (LIR). In summary, an outline of the principal representations which KCC intends to make in relation to the application will concern:

1. Needs Case
2. Noise;
3. Surface Transport;
4. Climate Change;
5. Heritage Conservation;
6. Socio-economic

## 5. Needs Case

- 5.1. KCC notes that aviation policy provides in principle support for airports to make best use of their existing runways, as set out in the 2018 policy document '*Beyond the Horizon: Making Best Use of Existing Runways (MBU)*'. Whilst the policy does not require potential capacity at other airports to be taken into account in determining whether a specific proposal for development at an airport can be approved, the availability of capacity at other airports is relevant to considering the demand for and the level of benefits that could be realised from the Northern Runway Project (NRP).
- 5.2. KCC also recognises that having a second runway available for use by departing aircraft at peak times would improve the resilience of the Gatwick operation in terms of minimising and mitigating the current substantial levels of delay experienced by aircraft at the high levels of single runway usage experienced pre-pandemic as set out in Section 7.2 of the Needs Case (APP-250). This is particularly relevant as the current levels of congestion are material to assessing the extent to which the baseline throughput of the Airport can be materially increased above the peaks of demand handled pre-pandemic.
- 5.3. The assessment of the effects of the NRP, both positive and negative, rely on the projections of future passenger demand and aircraft movements at Gatwick, which in turn rely on the assessment of the increase in capacity that can be delivered by the NRP compared to the baseline capacity. It is important for the Local Authorities (LAs) to understand the implications of the NRP in order to ensure that appropriate mitigations are in place to address the adverse effects having regard to the extent of benefits that can be realised.
- 5.4. In terms of the Base Case capacity, the Authority notes that airlines are already expressing concern about the resilience of the current runway operation at 55 aircraft movements per hour given current high levels of delay incurred. This may be a factor in the slower recovery of Gatwick from the effects of the pandemic

than other London airports. Ultimately, the extent of delays impacts on airlines' willingness to base or schedule more aircraft into the Airport, and this has implications for the baseline passenger and aircraft movement forecasts that have informed the baseline assessment of environmental impacts.

- 5.5. The assessment of the impacts of the NRP relies on the difference between the baseline capacity and that attainable with the two runways in operation. Whilst it is accepted that the NRP may enable Gatwick to handle up to 69 aircraft movements per hour in periods when there is an even demand by arriving and departing aircraft movements, the Authority is not yet convinced that Gatwick will be able to handle peak demand in the early morning period that is dominated by departing aircraft that are based at the Airport. It is these based aircraft that drive much of the local economic benefit through supporting the basing of air crew. Gatwick Airport Limited (GAL) has not yet produced sufficient evidence that such movements could be handled without giving rise to excessive levels of delay such that the airlines would be less willing to base additional aircraft at the Airport. This is a view expressed by the Airport's largest airline customer, easyJet in its Relevant Representation (RR-1256).
- 5.6. Given the structure of the departure routes, particularly in the westerly Runway 26 direction, many aircraft will require more than the minimum 1-minute separation between departures. Aircraft will have to be held on the ground – on stand or in the 'Charlie Box' - in order to be sequenced to optimise the use of the two runways. Based on the information provided to date, the Authority is not convinced that this can be managed without unacceptable delays to the airlines. Furthermore, to the extent that there is congestion in the broader airspace to the north of the Airport, achieving the increase in throughput could require greater use of the WIZAD noise preferential departure route to the south, with detrimental effects on local communities.
- 5.7. Having regard to the additional delay likely to be incurred by based aircraft at the movement rates claimed by GAL, we believe that the uplift in usable runway capacity at Gatwick, compared to the current position, may only be of the order of half of that asserted by GAL when realistic patterns of demand by airlines is taken into account. Whilst it is recognised that air traffic control procedures may evolve and allow more relaxed separations between aircraft following the same departure route, consideration of the capacity deliverable with the NRP has to be judged, in the first instance, based on current procedures as it cannot be guaranteed that higher capacity could be delivered in practice.
- 5.8. If the capacity deliverable by the Norther Runway Project is lower than projected by GAL, this has implications for the level of demand that can be accommodated and the assessment of the effects, both positive and negative of the proposed development. The Authority's present position is that, based on the evidence so far presented, the level of increase in capacity attainable from the NRP has been overstated by GAL and that, as a consequence, levels of usage – the demand forecasts – have been overstated. It is likely that achieving the claimed



throughput in peak periods may require different use of the departure routes resulting in potentially greater environmental effects.

- 5.9. Furthermore, the methodology by which the demand forecasts have been derived is not considered robust, even if the underpinning assumptions as to the capacity attainable with two runways in use were correct. GAL's demand forecasts have largely been derived using a 'bottom up' approach and are based on the capacity that is assumed to be available with and without the NRP. This relies on a judgemental assessment of the services that the airlines might operate if the capacity was available. Instead, a 'top-down' econometric approach would involve modelling the level of future demand within the wider catchment area served by the Airport, and then assessing the share that Gatwick might attain of the overall market demand. Section 2 of Annex 6 to Appendix 4.3.1 to the ES (APP-075) simply states assumptions as to the additional services in each market that the Airport might be able to attract on the basis that there is "limited growth opportunity at other London airports".
- 5.10. GAL's approach to calculating demand forecasts is purely aspirational. 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 to test the implications of more capacity at the other airports. It is an exercise in demonstrating how the capacity provided by the NRP might be used but it does not provide evidence that there is a realistic prospect of it being so used. This applies to both the Base and NRP Cases.
- 5.11. 'Bottom-up' forecasts are commonly used for short term planning at airports. They are typically only used to forecast up to a total of five years into the future because it is possible to reflect known discussions with the airlines. However, over the longer term, 'bottom-up' forecasts are too reliant on judgement and assumptions to be reliable, not least given the short-term nature of airlines' planning horizons at the individual route level. Both the Base and NRP Case forecasts assume that Gatwick will be able to achieve substantial growth in traffic in off-peak periods. It does not seem plausible to assume the same degree of peak spreading would be possible in the Base Case due to the limited scope for new, less seasonal, services to be accommodated compared to the extent to which growth might enable somewhat less seasonal operations with the NRP. In either case, the level of peak spreading assumed would imply that the Airport would become more like Heathrow in its annual profile of demand and this seems less likely given that long haul traffic is still expected to make up a relatively small proportion of the overall demand, with low fare leisure type services continuing to dominate the traffic mix set out in the Forecast Data Book (APP-075).
- 5.12. If GAL's assumptions are correct, it is unclear why in the Base Case, given constraint in capacity at Heathrow, some additional services have not already been attracted. The extent to which this is linked to current congestion issues is not clear. Consequently, it is not evident that what is planned to improve the attractiveness of the Airport is sufficient to justify the assumption that additional

flights in each market could be attracted with the existing infrastructure to deliver a forecast throughput in the Base Case of up to 67 mppa. For this reason, it is considered that the assumption that the Airport can attain 67 mppa, up from 46.6 mppa in 2019, is not realistic and that a Base Case capacity in the range 50-55 mppa is more likely.

- 5.13. Although some top-down benchmarking of the demand forecasts has been undertaken by reference to the Department for Transport's (DfT) national aviation forecasts, it is not entirely clear the extent to which this benchmarking has considered the effect of additional capacity at other airports in driving overall levels of demand. Therefore, it may be possible that the forecasts overstate the actual demand that would be available to Gatwick.
- 5.14. Due to the use of a bottom-up approach to modelling future demand, coupled with uncertainty about the validity of top-down modelling, KCC is not yet satisfied that the demand forecasts in their present form can be relied on. There are doubts that Gatwick could achieve the forecast growth with the NRP, over the timescale claimed GAL, even if its assumptions as to future NRP capacity are correct. This applies regardless of whether a third runway is constructed at Heathrow or not.
- 5.15. On the basis that the demand projections for the Base Case with the existing runway are likely to have been overstated, possibly even more so than those with the NRP given current levels of airfield congestion and the views of airlines, it seems likely that the differences in the environmental impacts with and without development may have been understated.
- 5.16. In particular, the consequence of this overstatement of demand is that the limit size of the noise contour in the Noise Envelope will have been set too large and so 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. This is especially so given that it is proposed that the Noise Envelope be set by reference to a slower fleet transition case that has not been updated since the Preliminary Environmental Information Report (PEIR), despite significant orders of new generation aircraft by easyJet and other airlines that would mean that the core case fleet assumptions appear much more realistic.
- 5.17. A consequence of the approach to the 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.

5.18. Overall, this means that there can be little confidence that the decision maker can rely on the assessment of effects to judge whether the benefits outweigh the harms.

## **6. Noise**

### Noise Impacts

- 6.1. One of KCC's main concerns regarding the proposed Northern Runway Project is the noise impacts of increased flights on communities on the ground. 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.
- 6.2. 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.
- 6.3. 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.
- 6.4. KCC's Local Impact Report has identified a number of adverse impacts in regard to air noise and the following additional information is requested from the Applicant:

### Noise Impact A – Overflights - Negative

- 6.5. 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.
- 6.6. 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 on the main runway with the Northern Runway in routine use for departures only, and whether any increase in the frequency of arrivals on the main runway has been assessed. Without this assessment, the true extent of the impacts felt by communities on the ground will not be properly assessed.

#### Noise Impact B – Go-arounds - Negative

- 6.7. 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.

#### Noise Impact C – Night Noise - Neutral

- 6.8. 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.
- 6.9. 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.

#### Noise Impact D – Tunbridge Wells District – Inconclusive.

- 6.10. It has not been possible to determine the impact of the proposals on Tunbridge Wells district due to the Applicant's application failing to provide any information about aircraft noise in this area. KCC is already well aware of the adverse impacts current operations at Gatwick have on communities in Tunbridge Wells, and it is imperative any potential increase is fully assessed and mitigated where possible.
- 6.11. KCC requests for the Applicant to undertake further assessment to illustrate the impact of noise in Tunbridge Wells. 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.

#### Noise Impact E – Sevenoaks District – Neutral

- 6.12. Whilst Noise Impact E of KCC's Local Impact Report concludes that noise impacts associated with the NRP will have a neutral impact on Sevenoaks district, it is imperative that discussion on the impact of increases in aircraft

movements takes place between KCC and the Applicant to put increases into context and determine if a likely significant effect should be identified.

- 6.13. Furthermore, similar to Tunbridge Wells, Sevenoaks is more so affected by arrivals during westerly operations and no information has been provided in GAL's application as to the associated noise impacts with the Northern Runway in routine operation. Further information on arrival impacts is requested from the Applicant.

#### Noise Impact F - Community Representative Locations - Neutral

- 6.14. For the one community representative location in Sevenoaks, identified by the Applicant, there was deemed to be a neutral impact. The location chosen was Chiddingstone Church of England Church.
- 6.15. While the increase in noise at Chiddingstone Church was deemed minimal, KCC would request the Applicant to undertake further assessment of additional community representative locations. Locations should be identified in other areas of Sevenoaks, such as Penshurst and Edenbridge, where adverse noise impacts are already experienced by existing Gatwick operations, and locations identified within Tunbridge Wells which has so far not yet been subject to any thorough noise assessment.

#### Noise Impact G – Noise Envelope – Negative

- 6.16. 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.

#### Noise Impact H – Overflight of Hever - Negative

- 6.17. KCC's Local Impact Report identified a negative impact on Hever. The Castle in particular is anticipated to experience a 20% increase in daily overflights. Further clarification is required from the Applicant as to whether this increase includes any additional arrivals that may use the main runway when the Northern Runway is being routinely used.
- 6.18. Hever Castle is a popular heritage asset and standard noise mitigation, such as insulation schemes, will not be appropriate. The level of overflight by existing operations at Gatwick already disturbs the tranquillity of the area and so any additional overflight should not be allowed.

#### Noise Impact I – Overflight of Knole - Neutral

- 6.19. The Applicant's assessment deems a minor increase in the number of overflights in Knole compared to the 2019 Baseline. Consideration needs to be given to the fact Knole Park in particular is a tourist attraction within the designated Kent Downs National Landscape and so overflight of this area should be avoided as much as possible. KCC sees the potential for this to be addressed through the

airspace change process and does not currently anticipate for any further mitigation to be required through the DCO.

#### Noise Impacts J - National Landscapes - Negative

- 6.20. Noise Impact J of KCC's Local Impact Report highlighted the recent change to legislation regarding National Landscapes. This change obliges decision makers to "*seek to further the purposes*", as opposed to "*have regard to*". 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 and how the Applicant will "*seek to further the purposes*" of the National Landscape.

## **7. Surface Transport (as a neighbouring Local Highway Authority)**

- 7.1. KCC's analysis of Gatwick Airport's application documentation has identified the following adverse impacts in regard to surface transport:

#### Surface Transport Impact A – Access via Strategic Road Network – Inconclusive.

- 7.2. KCC requests sight of the Local Model Validation Report (LMVR) for the Project, so that the performance of the model in the vicinity of M25 Junction 7 (M23) can be confirmed, where an impact has been identified.
- 7.3. KCC notes in Transport Assessment [AS-079] Table 12.5.4 that National Highways recognises that "*it would appear disproportionate to expect the developer of Gatwick NRP to redesign the entire interchange to cope with a relatively small increase in traffic figures over those which would naturally occur*". Further consultation with National Highways is apparently ongoing, yet KCC is not aware of any plans to include this intersection in a future Road Investment Strategy (RIS) pipeline. As this junction is forecast to carry around half the road trips associated with the airport – according to Transport Assessment [AS-079] Diagram 12.3.2 – it will be important to include it in the monitoring of the Surface Access Commitments [APP-090] and work with National Highways on any required mitigation.
- 7.4. With regard to the risk that the 55% public transport mode share targets are too ambitious – in particular the fifteen-fold increase in air passenger coach services proposed for Kent – we request a model sensitivity test on the implications of a continuation of the flat public transport mode share of "*around 45%*" for air passengers prior to the pandemic, which Diagram 6.2.4 of the Transport Assessment [AS-079] indicates has been fairly consistent since 2012. KCC would appreciate receiving model results in the form of shape files

for such an assessment, including traffic speeds and volume / capacity ratios, so we can better appreciate the effects on the road network.

#### Surface Transport Impact B – Access via Local Road Network – Neutral

- 7.5. Under Surface Transport Impact A, KCC has requested a model sensitivity test on the implications of a continuation of the flat public transport mode share of “around 45%” for air passengers prior to the pandemic, which we will use to confirm our initial assessment that the Project provides a neutral impact on the local road network from the perspective of travellers from Kent.

#### Surface Transport Impact C – Rail Network Capacity - Negative

- 7.6. KCC acknowledges that mitigation of our concerns about potential pressure on the two London transfer stations that support Kent trips to Gatwick would be the responsibility of Network Rail and the operators. We consult regularly with Network Rail and understand there has been a recent route study on Gatwick to Tonbridge services via Redhill, which could alleviate such pressure.
- 7.7. With regard to the risk that the 55% public transport mode share targets are too ambitious – in particular the fifteen-fold increase in air passenger coach services proposed for Kent – we request a second model sensitivity test that maintains the public transport mode share for air passenger coaches at the same levels as those prior to the pandemic but covers the achievement of 55% public transport mode share by increases in rail patronage.

#### Surface Transport Impact D – Public Transport: Kerbside Provision for Coaches - Positive

- 7.8. KCC notes the volume of work done and reported in Transport Assessment [AS-079] Chapter 10 to confirm the rail platform and concourse facilities at Gatwick will be able to accommodate the forecast demand. KCC cannot find a similar analysis regarding kerb space facilities for coaches to accommodate the boarding & alighting of passengers with luggage (with significant associated dwell times).
- 7.9. In the absence of this information, it is not possible to understand whether the proposed increases in coach travel supporting the 55% public transport target – in particular the fifteen-fold increase in air passenger coach services proposed for Kent – present a positive or negative impact to Kent travellers.
- 7.10. We request further information on existing and proposed kerb space provision for air passenger coaches at the two terminals, to better understand whether the forecast increases in supply can be accommodated.

#### Surface Transport Impact E – Public Transport: Proposed Coach Services - Negative

- 7.11. KCC requests the Applicant to confirm the full list of new and enhanced coach services to Gatwick, which appear to differ in Transport Assessment [AS-079] Tables 7.1.1 and 11.3.2 and Surface Access Commitments [APP-090] Table 1,

which outlines the Applicant’s funding commitments for coach services. KCC appreciates the Applicant’s commitment to “*provide reasonable financial support*” for the coach services identified in Table 1 “*for a minimum of five years*” but is concerned about what happens after, and its effect on the 55% mode share targets for public transport by year 2047. Furthermore, we have concerns around what constitutes “*reasonable financial support*”. KCC’s experience is that coach services between Kent and Gatwick do not work without subsidy. A relevant example of this is the 2015 Kent to Gatwick direct service introduced commercially by National Express. This was subsequently withdrawn due to lack of use approximately 18 months later. The same is true of a more recent direct coach offering to Stansted. The forecast fifteen-fold increase in air passenger coach services proposed between Gatwick and Kent should perhaps be reviewed in this historical context. We also ask the Applicant to provide further information on what they deem “*reasonable financial support*” and to work with KCC to develop the proposals for coach services to and from Kent to ensure they are successful.

7.12. As the enhanced Romford-Upminster-Dartford-Gatwick coach service will initially suffer from existing and worsening congestion at the Dartford Crossing, a simple mitigation would be to provide a dedicated coach service between Dartford and Gatwick (or inclusion of Dartford in the proposed Bexley-Footscray-Gatwick service) until the Lower Thames Crossing is operational.

7.13. The proposed new Royal Tunbridge Wells-East Grinstead-Gatwick coach service is assumed to be routed via the A264; a narrow, rural, single-carriageway road which KCC deems unsuitable for such a service. Figure 1 below illustrates how Google Directions shows the route between Royal Tunbridge Wells and Gatwick to be faster via the A21, M25 and M23 – a route which could also take in Tonbridge, a catchment of comparable population to Royal Tunbridge Wells. East Grinstead is already served by the Uckfield-East Grinstead-Gatwick coach service and local buses.

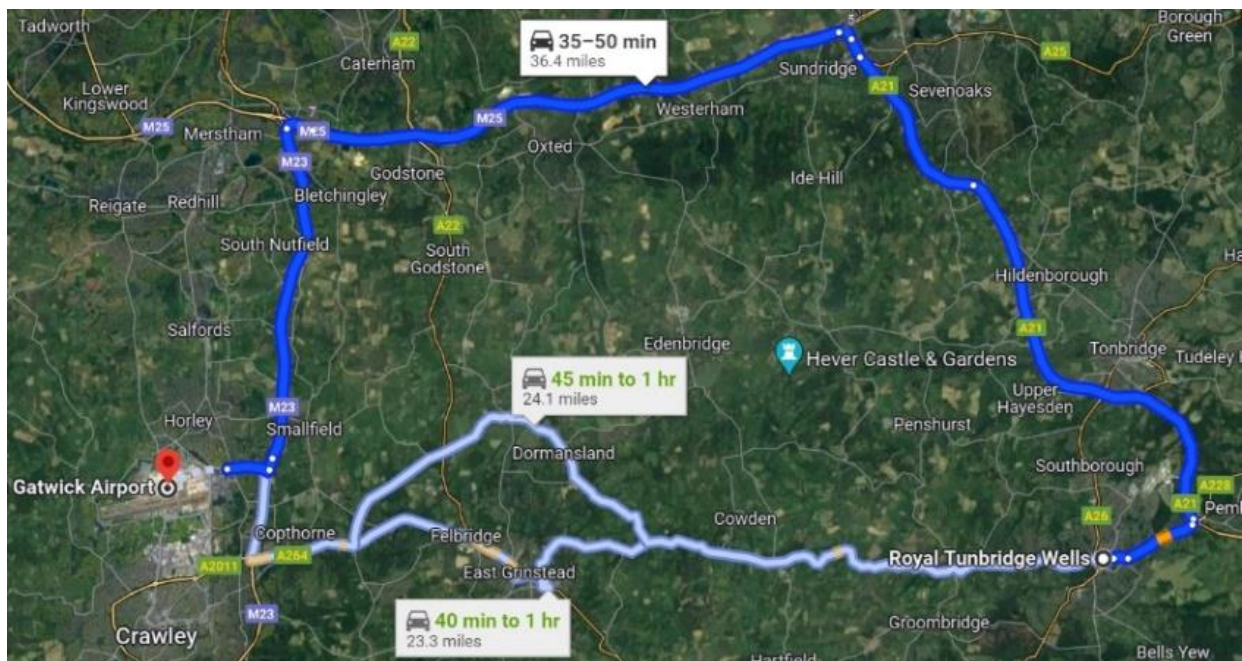


Figure 1 - Route options between Gatwick Airport and Royal Tunbridge Well



## **8. Climate Change**

- 8.1. KCC's analysis of Gatwick Airport's application documentation has identified the following adverse impacts in regard to climate change:

### Climate Change Impact A – Compliance with National Targets - Negative

- 8.2. Climate Change Impact A of KCC's Local Impact Report outlined our concerns around Gatwick Airport Limited's compliance with the recommendations of the Climate Change Committee (CCC). The Applicant's application focuses on how the proposals align with the Jet Zero Strategy, but KCC seeks further clarity from the Applicant as to how they are complying with the Climate Change Committee's recommendations. Without this there cannot be the confidence that this Project will not jeopardise the UK's ability to meet the legally binding ambitions of the Paris Agreement.

### Climate Change Impact B - Aviation Emissions - Negative

- 8.3. Climate Change Impact B also highlighted our concerns around the increase in aviation emissions as a result of the anticipated increase in air traffic movements. Again, KCC seeks clarification from the Applicant on how they propose to align with the Paris Agreement given the large volume of extra emissions from this Project and the unrealistic prospect of sequestering these. Furthermore, it would be helpful to understand if the impact of the Northern Runway proposals on the Sixth Carbon Budget has been calculated.

### Climate Change Impact C – Cost to Society of Greenhouse Gas Emissions - Negative

- 8.4. KCC's Local Impact Report highlighted the cost to society of increased greenhouse gas emissions. Before it can be determined whether sufficient mitigation measures are proposed by the Applicant, clarification must first be provided by Gatwick Airport Limited as to whether the impact on society of extra emissions generated from the Project has been calculated.

## **9. Heritage Conservation**

### Heritage Conservation Impact A - Impact on Historic Buildings – Negative

- 9.1. In order to understand the extent of the impact of increased overflight on Historic Buildings in West Kent, KCC would recommend the Applicant undertakes a Historic Environment Assessment with a suitable impact assessment. It is evident from the Noise and Vibration Chapter of the Environmental Statement that historic buildings such as Hever Castle will be adversely impacted. To ensure the assessment is robust, the study area should be agreed with KCC Heritage before the assessment is completed.

#### Heritage Conservation Impact B – Impact on Archaeology – Neutral

- 9.2. Whilst Heritage Conservation Impact B of KCC's Local Impact Report concluded a neutral impact, this result cannot be confirmed until a Historic Environment Assessment of West Kent is undertaken.

#### Heritage Conservation Impact C – Impact on Historic Landscapes - Negative

- 9.3. In addition, a Historic Environment Assessment of West Kent would also assist in determining the extent to which the Northern Runway proposals will impact on historic landscapes in the area and ensure any appropriate mitigation is secured through the DCO process.

## **10. Socio-economics**

#### Socio-economic Impact A – Economic Benefits to Kent - Positive

- 10.1. KCC recognises the economic benefits that growth at the Airport could bring to Kent. It can be argued that the adverse impacts of current operations outweigh the benefits. However, the NRP has the potential to bring greater economic prosperity to Kent and the wider South East in terms of business and tourism. The Applicant should ensure as much as possible that the benefits of the Project are shared equally across the whole six authorities' area, working with local authorities where necessary to achieve this.

#### Socio-economic Impact B - Skills and Employment - Positive

- 10.2. Whilst Socio-economic Impact B of KCC's Local Impact Report identified the benefits that could be achieved through successful delivery of the Applicant's Employment, Skills and Business Strategy (ESBS), KCC would argue the Implementation Plan would be better secured through the DCO as opposed to a separate S106 Agreement. The reasoning for this is because the ambitions of the ESBS stretch further than the geographical area of which a S106 Agreement would cover. In addition, it may be the case that not all authorities will be party to the S106 Agreement. Therefore, commitments to 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.

## **11. Conclusion**

- 11.1. This Written Representation from Kent County Council (KCC) has set out the authority's position on Gatwick Airport's Northern Runway Project which is one of overall opposition.
- 11.2. At Gatwick, bringing the northern runway into operation for departing aircraft will significantly increase the number of aircraft movements that the airport can handle. Whilst 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), it cannot be ignored that routine use of the northern runway would have an adverse impact on local communities on the ground, would not further the purpose of the National Landscapes and would further contribute towards Climate Change.
- 11.3. The table below provides a summary the impacts identified through our Local Impact Report and the action required, as outlined in this Written Representation.

Impact	Description of Impact	Nature of Impact	Action Required
<b>Noise Impacts</b>			
Noise Impact A	Overflights	Negative	Further detail is needed on the number of overflights. Clarification is required from the Applicant as to the breakdown of proposed arrivals and departures on the main runway with the Northern Runway in routine use for departures only, and whether any increase in the frequency of arrivals on the main runway has been assessed
Noise Impact B	Go-arounds	Negative	KCC would encourage the Applicant to work with airlines to reduce the need for go-arounds as much as feasibly possible.
Noise Impact C	Night noise	Neutral	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.
Noise Impact D	Tunbridge Wells District	Inconclusive	KCC requests for the Applicant to undertake further assessment to illustrate the impact of noise in Tunbridge Wells.
Noise Impact E	Sevenoaks District	Neutral	Discussion on the impact of increases in aircraft movements takes place between KCC and the Applicant to put increases into context and determine if a likely significant effect should be identified. Further information on arrival impacts is requested from the Applicant.

Impact	Description of Impact	Nature of Impact	Action Required
Noise Impact F	Community Representative Locations	Neutral	KCC would request the Applicant to undertake further assessment of additional community representative locations. Locations should be identified in other areas of Sevenoaks, such as Penshurst and Edenbridge, where adverse noise impacts are already experienced by existing Gatwick operations, and locations identified within Tunbridge Wells which has so far not yet been subject to any thorough noise assessment.
Noise Impact G	Noise Envelope	Negative	KCC requests that the Applicant undertakes further work on the noise envelope, in consultation with local authorities, to develop a robust noise envelope.
Noise Impact H	Overflight of Hever	Negative	Further clarification is needed from the Applicant as to whether the number of overflights include any potential increase in arrivals.
Noise Impact I	Overflight of Knole	Neutral	KCC sees the potential for this to be addressed through the airspace change process and does not currently anticipate for any further mitigation to be required through the DCO.
Noise Impact J	National Landscapes	Negative	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 and the Applicant should demonstrate how they intend to “ <i>seek to further the purposes</i> ” of the National Landscape (formerly the AONB).

Impact	Description of Impact	Nature of Impact	Action Required
<b>Surface Transport Impacts</b>			
Surface Transport Impact A	Access via Strategic Road Network	Inconclusive	KCC requests sight of the Local Model Validation Report (LMVR) for the Project. Furthermore, KCC requests a model sensitivity test on the implications of a continuation of the flat public transport mode share of “around 45%” for air passengers prior to the pandemic, KCC would appreciate receiving model results in the form of shape files for such an assessment, including traffic speeds and volume / capacity ratios, so we can better appreciate the effects on the road network.
Surface Transport Impact B	Access via Local Road Network	Neutral	As above, KCC has requested a model sensitivity test on the implications of a continuation of the flat public transport mode share of “around 45%” for air passengers prior to the pandemic, which we will use to confirm our initial assessment that the Project provides a neutral impact on the local road network from the perspective of travellers from Kent.
Surface Transport Impact C	Rail Network Capacity	Negative	KCC requests a second model sensitivity test that maintains the public transport mode share for air passenger coaches at the same levels as those prior to the pandemic but covers the achievement of 55% public transport mode share by increases in rail patronage.

Impact	Description of Impact	Nature of Impact	Action Required
Surface Transport Impact D	Public Transport: Kerbside Provision for Coaches	Positive	KCC requests further information on existing and proposed kerb space provision for air passenger coaches at the two terminals, to better understand whether the forecast increases in supply can be accommodated.
Surface Transport Impact E	Public Transport: Proposed Coach Services to Kent	Negative	KCC requests the Applicant to confirm the full list of new and enhanced coach services to Gatwick and the level of financial support that they will be providing.
<b>Climate Change Impacts</b>			
Climate Change Impact A	Air quality during construction and operation	Negative	KCC seeks further clarity from the Applicant as to how they are complying with the Climate Change Committee's recommendations.
Climate Change Impact B	Aviation Emissions	Negative	KCC seeks clarification from the Applicant on how they propose to align with the Paris Agreement given the large volume of extra emissions from this Project and the unrealistic prospect of sequestering these. Furthermore, it would be helpful to understand if the impact of the Northern Runway proposals on the Sixth Carbon Budget has been calculated.
Climate Change Impact C	Cost to Society of Greenhouse Gas Emissions	Negative	Clarification must be provided by the Applicant as to whether the impact on society of extra emissions generated from the Project has been calculated.

Impact	Description of Impact	Nature of Impact	Action Required
<b>Heritage Conservation Impacts</b>			
Heritage Conservation Impact A	Impact on Historic Buildings	Negative	KCC would recommend the Applicant undertakes a Historic Environment Assessment with a suitable impact assessment.
Heritage Conservation Impact B	Impact on Archaeology	Neutral	KCC would recommend the Applicant undertakes a Historic Environment Assessment with a suitable impact assessment
Heritage Conservation Impact C	Impact on Historic Landscapes	Negative	KCC would recommend the Applicant undertakes a Historic Environment Assessment with a suitable impact assessment
<b>Socio-economic Impacts</b>			
Socio-economic Impact A	Economic Benefits to Kent	Positive	The Applicant should ensure as much as possible that the benefits of the Project are shared equally across the whole six authorities' area, working with local authorities where necessary to achieve this.
Socio-economic Impact B	Skills and Employment	Positive	Commitments to deliver the Applicant's Employment, Skills and Business Strategy (ESBS) 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, as opposed to the S106 Agreement.