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Your Reference:
TR020005

KCC Interested Party
Reference Number:
20044780

Date: 26th March 2024

BY ONLINE SUBMISSION ONLY

Dear Mr Gleeson,

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)

In line with the Development Consent Order process, as outlined within the ‘*Rule 8 letter - Notification of timetable for the Examination letter*’ [PD-011], please find enclosed the second iteration of Kent County Council’s (KCC) Principal Areas of Disagreement Summary Statement (PADSS) Tracker.

This document has been updated to reflect the latest Statement of Common Ground between KCC and the Applicant [REP1-041], along with the key issues presented within KCC’s Local Impact Report [REP1-079] and Written Representation [REP1-080].

Our current principal areas of disagreement relate to:

- Noise
- Climate change and carbon emissions
- Surface access (Coach and Rail connections)
- Heritage conservation
- Socio-economic impacts

The matters raised will be updated and expanded on in subsequent submissions throughout the Examination period.

Yours sincerely,

Simon Jones

Corporate Director – Growth, Environment and Transport

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Ref	Principal Issue in Question	KCC LIR/WR and Statement of Common Ground ref:	The brief concern held by Kent County Council which has been 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
Noise					
1	<p>Noise - Aircraft Noise over Kent – impact on communities, the AONB (National Landscapes) and heritage sites</p> <p>Update (V2) The term AONB to be updated to National landscapes</p>	<p>2.16.3.1</p> <p>LIR - Noise Impact H,I,J</p>	<p>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 National Landscape designated 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.</p> <p>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.</p> <p>Updated position (V2): KCC's previous position is maintained. KCC note that Hever Castle is anticipated to experience a 20% increase in daily overflights. The current level of over-flight and resulting noise impact on West Kent is unacceptable and measures should be taken by</p>	<p>KCC understand that noise levels, even with technological advances, will continue to have adverse impacts on West Kent residents, the AONB (National Landscape) and heritage attractions.</p> <p>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.</p> <p>Updated position (V2): KCC's previous position is maintained. Further clarification is required from the Applicant as to whether the increase at Hever Castle includes any additional arrivals that may use the main runway when the Northern Runway is being routinely used for departures.</p> <p>Furthermore, 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.</p>	Unlikely

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			<p>Gatwick Airport Ltd to reduce the number of aircraft flying over this area.</p> <p>KCC's Local Impact Report [REP1-079] highlighted the recent change to legislation regarding National Landscapes. Where possible the project should "seek to further the purposes of the National Landscape".</p>		
2	Noise – overflight	LIR - Noise Impact A	<p>New item: The documentation submitted by the Applicant lacks any kind of information on how communities would be affected by the proposed expansion. It is clear that areas within west Kent would experience a worsening of overflight and be negatively impacted. This is particularly the case where aircraft turn over areas such as Tunbridge Wells to join the Instrument Landing System (ILS).</p> <p>Apart from the landscape assessment locations identified, no further details on the number of overflights are provided. Therefore, it is not possible to determine the extent to which the number of overflights are anticipated to increase within the set categories.</p> <p>Furthermore, the proposals focus mainly on aircraft departing the airport, but little information is provided regarding how routine use of the Northern Runway could impact the number of aircraft arriving on the main runway.</p>	<p>Further detail is needed for local authorities to understand the true extent of overflight impacts on communities on the ground.</p> <p>The current documentation 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.</p>	Likely

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3	Noise – go around	LIR - Noise Impact B	<p>New item: KCC appreciates it is difficult to predict the need for aircraft to go-around when arriving at 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.</p>	<p>The Applicant's assessment needs to consider an increased chance of go-arounds and the impact these low flying aircraft have on communities in West Kent.</p> <p>KCC would further encourage the Applicant to work with airlines to reduce the need for go-arounds as much as feasibly possible.</p>	Unlikely
4	Noise – night noise	LIR - Noise Impact C	<p>New item: It is clear that, in Kent, the Applicant anticipates there will be minor differences in levels of night noise. However, 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.</p>	<p>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.</p>	Likely
5	Noise - Overflight - Health and Wellbeing (awakenings)		<p>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> <p>Updated position (V2): KCC's position remains unchanged.</p>	<p>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> <p>Updated position (V2): KCC's previous request remains as stated.</p>	Likely

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5	Noise – Tunbridge Wells	LIR - Noise Impact D	<p>New item: 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.</p>	<p>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.</p> <p>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.</p>	Likely
6	Noise - Sevenoaks	LIR - Noise Impact E	<p>New item: KCC’s Local Impact Report [REP1-079] concludes that noise impacts associated with the NRP will have a neutral impact on Sevenoaks district, however, no information has been provided in the application as to the associated noise impacts with arrivals when the Northern Runway is in routine operation.</p>	<p>Further information on arrival impacts is requested from the Applicant.</p>	Likely
7	Noise – Community representative locations	LIR - Noise Impact F	<p>New item: Seven community representative locations were selected to: “...describe the air noise changes expected from the Project in more detail” (paragraph 14.9.150 [APP-039]). There is only one community representative location in Sevenoaks (Chiddingstone Church of England).</p>	<p>KCC would request the Applicant to undertake further assessment of additional community representative locations.</p> <p>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.</p>	Likely

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8	Noise – Noise Envelope	LIR - Noise Impact G	New item: The noise envelope put forward by the Applicant [APP-177] 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.	Likely
Climate change					
9	Climate Change - Emissions		<p>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.</p> <p>Updated position (V2): KCC’s concern previously outlined is maintained. When calculating the extra cost of Greenhouse gases to society due to the project the annual cost ranges from £185 million to £343 million. From 2029 to 2050, the cumulative impact cost of the extra carbon emissions released from this project totals £5.93 billion. It is currently unclear how the proposals are complying with the Climate Change Committee’s recommendations as detailed further in KCC’s written representation. On this basis, KCC are concerned about negative impact in terms of greenhouse gases and climate change.</p>	<p>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.</p> <p>Updated position (V2): KCC’s previous request is maintained.</p> <p>Clarification must be provided by Gatwick Airport Limited as to whether the impact on society of extra emissions generated from the Project has been calculated. KCC also require further detail regarding how the proposals comply with the Climate Change Committee’s recommendations.</p>	Likely

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10	Climate Change – Aviation Emissions		<p>New item: KCC are concerned about the proposed aviation emissions associated with this proposal. Data shows that between 2029 and 2050 an extra 18,523 ktonnes (kt) of CO₂e is projected to be produced from aviation emissions due to routine use of the Northern Runway, or 18,693kt of CO₂e in the event of a slow fleet transition.</p> <p>The extra aviation emissions from this project to 2050 would require 98,005 hectares of woodland to fully offset the extra emissions.</p>	<p>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.</p>	Unlikely
Surface Access					
11	Surface Access - Public Transport		<p>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> <p>Updated position (V2): KCC's concern previously outlined is maintained.</p> <p>Further to this, not all the proposed enhanced coach services appear to have been carried over from Transport Assessment to Surface Access Commitments [APP-090] Table 1. Proposed enhancements to the Uckfield-East Grinstead-Gatwick and the Romford-Upminster-Dartford-Gatwick coach services are missing, which would</p>	<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> <p>Updated position (V2): KCC's previous request is maintained. KCC further requests:</p> <ul style="list-style-type: none"> - Temporary mitigation for the Gatwick to Romford route until the Lower Thames Crossing is operational. - Royal Tunbridge Wells-East Grinstead-Gatwick coach service is rerouted to avoid unsuitable narrow roads. <p>KCC request further information on existing and proposed kerb space provision for air passenger coaches at the two terminals, to</p>	Likely

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			<p>have a negative impact on the Applicant’s 55% public transport mode share targets as well as travellers from Kent. Also, the enhanced Romford-Upminster-Dartford-Gatwick coach service will continue to suffer from existing and worsening congestion at the Dartford Crossing until Lower Thames Crossing is open.</p> <p>KCC agrees that coach supply should be determined by the operators / market forces but requests the Applicant to confirm that sufficient kerb space would be available to accommodate the significant increases in forecast coach arrivals & departures.</p> <p>KCC notes that the 55% public transport mode share targets assume a nearly three-fold increase in total air passenger coach services between 2016 and 2047. This is supported by a fifteen-fold increase in air passenger coach services for Kent. If this ambitious patronage is not realised there is an associated negative risk that private traffic levels between Kent and Gatwick are higher than forecast, taking the merges & diverges of the M25 Junction 7 (M23) intersection over capacity.</p>	<p>better understand whether the forecast increases in supply can be accommodated.</p> <p>Furthermore, KCC have concerns around what constitutes “reasonable financial support”. KCC’s experience is that coach services between Kent and Gatwick do not work without subsidy. KCC 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.</p> <p>Furthermore, to better understand the impact of the public transport mode share targets on the Strategic Road Network, we request a sensitivity test on public transport mode share forecasts.</p> <p>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.</p> <p>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.</p>	
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12	Surface Access - Rail Connections		<p>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> <p>Updated position (V2): KCC's concern previously outlined is maintained. KCC has concerns about potential pressure on the two London transfer stations that support Kent trips to Gatwick, given there are no direct rail services (although Network Rail has concluded that service operations would be feasible via Redhill station).</p>	<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> <p>Updated position (V2): KCC's previous request is maintained. A second model sensitivity test on public transport mode share forecasts is requested. The second model sensitivity test should maintain 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.</p>	Unlikely
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13	Surface Access – Strategic Road Network (SRN)		<p>New item: KCC notes that there is a capacity risk identified for M25 Junction 7 (M23) in Tables 12.5.3 & 12.5.4 of Chapter 12 of the Transport Assessment [AS-079].</p> <p>The merges & diverges of this intersection are forecast to operate at capacity in the model Core Scenario, so we would assume they would operate over capacity in traffic levels higher than this best practice planning scenario – with an associated negative impact on both public and private road transport access to the airport.</p>	<p>It is important to understand whether the model is well validated in this part of the road network, which provides the primary road access to Gatwick from Kent.</p> <p>This is not possible from the information provided in Transport Assessment Annex B – Strategic Transport Modelling Report [APP-260] Tables 7 to 13. Annex B Figure 11 appears to show a number of validation count sites on the M25 in the vicinity of M25 Junction 7 (M23) but performance of these sites does not appear to be reported.</p> <p>A Local Model Validation Report (LMVR) is mentioned in the Annex B text but does not appear in the Examination Library</p> <p>KCC requests this being made available, so the performance of the model in the vicinity of M25 Junction 7 (M23) can be confirmed.</p>	Likely
Heritage conservation					
14	Heritage conservation – Impact on historic buildings, archaeology and landscapes		<p>New item: The Applicant’s Environmental Statement – Chapter 7 Historic Environment [APP-032], Baseline Report [APP-101] and Historic Environment Figures [APP-054] do not cover West Kent.</p> <p>There is no assessment of increased noise, visual or pollution impact on Historic Buildings despite clear increases being demonstrated in Environmental Statement – Chapter 14 Noise and Vibration [APP-039].</p>	<p>KCC requests Historic Environment Assessment of West Kent heritage is undertaken with a suitable impact assessment (the study area should be agreed with KCC’s Heritage team).</p> <p>This assessment should include, but not be limited to, an assessment of increased noise, visual or pollution impact on Historic Buildings. Historic buildings that need to be assessed and considered are Hever Castle,</p>	Likely

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			It is essential that there is a reasonable assessment of the historic environment of West Kent so that a review of the impact from this scheme on the heritage assets' significance, including their settings, can be undertaken.	Penshurst Place and Chiddingstone Castle, along with those located within the Conservation Areas of Markbeech, Chiddingstone, Hoath Corner and Royal Tunbridge Wells historic spa town. Until a Historic Environment Assessment of West Kent heritage is provided KCC will continue to object to the proposals as we are unable to assess the full impact on historic buildings in West Kent.	
Socio-economic and needs case					
15	Needs Case	WR 5.1 SOCG 2.9.1.1	<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>Updated position (V2): KCC concerns relating to the needs case for the scheme remain. However, it should be noted that, if Gatwick Airport Limited's assessment of the needs case is correct and the anticipated growth is achieved, then KCC remain concerned about the negative impacts the anticipated use of the northern runway would have (as detailed in KCC's Local Impact Report and elsewhere in this document).</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> <p>Updated position (V2): KCC's request remains unchanged. Further detail has been provided in the Written Representation.</p>	Likely

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16	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>Updated position (V2): KCC's position remains unchanged.</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> <p>Updated position (V2): KCC's previous request remains as stated. Additionally, commitments to deliver the Employment, Skills and Business 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.</p>	Likely
Other issues					
18	Construction		<p>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.</p> <p>Updated position (V2): KCC's position remains unchanged</p>	<p>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.</p> <p>Updated position (V2): KCC's previous request remains as stated.</p>	Likely