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Your Reference:  
TR020005

KCC Interested Party  
Reference Number:  
20044780

Date: 15<sup>th</sup> May 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 Submission to Deadline 4**

As outlined within the Examination Timetable (Annex A of the Rule 8 letter (PD-011)), this letter is Kent County Council's (KCC) Deadline 4 submission which provides the following:

- Comments on responses to ExQ1
- Comments on any further information/submissions received by Deadline 3

**Comments on responses to ExQ1**

Deadline 3 Submission – 10.16 The Applicant's Response to the ExA's Written Questions (ExQ1) – Socio-Economic Effects (REP3-103)

KCC acknowledges the Applicant's answer to the Examining Authority's written question *SE. 1. 6 Employment, Skills and Business Strategy (ESBS) – Securing Mechanism*. We agree that KCC does not need to be party to the s106 Agreement, and we appreciate being included on the ESBS Steering Group, but the answer does not address the issue as to why the ESBC should be secured through the s106 Agreement rather than a Requirement of the DCO. If multiple parties are involved in the implementation of the ESBS, then it would be better for the Implementation Plan to be secured through a 'Stakeholder Actions and Commitments Register' where all parties would then have an equal say on the wording and implementation of the ESBS.

Deadline 3 Submission – 10.16 The Applicant's Response to the ExA's Written Questions (ExQ1) – Traffic and Transport (REP3-104)

KCC notes the Applicant's answers to the Examining Authority's written questions TT.1.13 and particularly TT.1.35 in confirming that our requested mode share sensitivity tests have not been carried out; and that our concerns would be covered by the monitoring and



reporting procedures outlined in the updated Surface Access Commitments [REP3-028]. KCC believes that these procedures do not address our concerns over the ambitious fifteen-fold increase in air passenger coach services for Kent that support the 55% public transport mode share target of the Surface Access Commitments [REP3-028], and we reiterate our request for the following:

- A 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 updated Transport Assessment [REP3-058] indicates has been fairly consistent since 2012. This test represents an “adverse case” for travel between Kent and Gatwick by car; for which we would like to understand the implications on the highway network and particularly M25 Junction 7 (M23), where the merges & diverges of the relevant turning movements are modelled at or around capacity in the Core Scenario.
- A 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. This test represents an “adverse case” for travel between Kent and Gatwick by rail - in terms of increasing patronage - for which we would like to understand the implications on the railway network, such as the capacity of the London rail connections that Kent passengers have to travel through.
- A copy of the Local Model Validation Report (LMVR) so that the performance of the model in the vicinity of M25 Junction 7 (M23) can be confirmed, where an impact has been identified, as this is a critical point in the journey between Kent and Gatwick by road for both private and public transport modes.

#### Deadline 3 Submission – 10.16 The Applicant’s Response to the ExA’s Written Questions (ExQ1) – Climate and Greenhouse Gases (REP3-086)

The Climate Change Committee calculates carbon budgets using science-based targets and exists, as an expert forum, to advise the government on what is achievable. The Committee’s key message on airport expansion is stated very clearly in its 2023 Report to Parliament:

*“Airport expansion. The Committee’s Sixth Carbon Budget Advice recommended no net expansion of UK airports to ensure aviation can achieve the required pathway for UK aviation emissions. Since making this recommendation the Committee has noted that airports across the UK have increased their capacities and continue to develop capacity-expansion proposals. This is incompatible with the UK’s Net Zero target unless aviation’s carbon-intensity is outperforming the Government’s pathway and can accommodate this additional demand. No airport expansions should proceed until a UK-wide capacity management framework is in place to annually assess and, if required, control sector CO2 emissions and non-CO2 effects.”* [Source: ‘Progress in reducing UK emissions – 2023 Report to Parliament, p267].

KCC concurs with the concerns of the Climate Change Committee, who explain that *“the Jet Zero Strategy approach is high risk due to its reliance on nascent technology - especially rapid sustainable aviation fuel uptake and aircraft efficiency savings - over the period up to the Sixth Carbon Budget”*. [Source: ‘Progress in reducing UK emissions – 2023 Report to Parliament, p267].

KCC would recommend, following the Precautionary Principle, to not grant consent for this project currently. The government will monitor progress against the emissions reduction trajectory in the Jet Zero Strategy on an annual basis from 2025, with a major review of the Strategy and delivery plan every five years. The first major review will be in 2027. Therefore, we recommend that the project should be placed on hold until the review in 2027, when the impact of this expansion can be evaluated against the emission pathway in the Jet Zero Strategy to ensure that it sits within the Sixth Carbon Budget. The project should only be given the go ahead to proceed if the extra emissions will still allow the government to meet the Sixth Carbon Budget and its legally binding obligations.

### **Comments on any further information/submissions received by Deadline 3**

#### Deadline 3 Submission – 10.15 The Applicant’s Response to the Local Impact Reports (REP3-078)

##### *Noise Impact A – Overflights – Unchanged Negative Impact*

In response to KCC’s Noise Impact A the Applicant admits that “*the Northern Runway Proposals will facilitate more arrivals on the main runway, and this has been fully taken into account in the noise assessment and overflight mapping and commentary.*” However, it cannot be clearly distinguished from the noise assessment and overflight mapping the true extent to which Kent will be impacted as a result of increased arrivals. In addition, the Applicant has also failed to clarify if the split between the number of arrivals and departures on the main runway with the northern runway in operation, for example, would this be 50:50. Again, this makes it difficult for KCC to determine the true extent of the impact of these proposals.

If what the Applicant states in their response is correct, that the title for Figure 14.9.31 is incorrect and should be “*2032 All Airports Overflights with Project Flights (20%)*” instead of “*2032 A319 Departure Overflights from the Main and Northern Runways*”, then it is not possible for Interested Parties to compare the overflight mapping of Gatwick overflights. The Applicant has not made it possible to draw a direct comparison between 2019 Baseline Gatwick Overflights and 2032 Gatwick Overflights with the Northern Runway. The only overflight mapping provided for 2032 is a combination of all airports and this masks the extent to which the northern runway proposals contribute to the number of overflights.

##### *Noise Impact D – Tunbridge Wells District – Unchanged Inconclusive Impact*

When comparing Figure 14.6.7 (2019 Baseline Gatwick Overflights) and 14.6.8 (2019 Baseline Non-Gatwick Overflights) in APP-063, it is clear that the overflight experienced by areas of West Kent, are predominantly Gatwick flights. In response to the concerns raised by KCC in relation to noise impacts on Tunbridge Wells. The overflight mapping does not illustrate the true degree of change expected in the Tunbridge Wells area as only a map showing overflights from all airports in 2032 is provided.

##### *Surface Transport Impacts A to C – Unchanged Impacts*

KCC confirms its position on Surface Transport Impacts A (Access via Strategic Road Network), B (Access via Local Road Network) and C (Rail Network Capacity) remain as published in our Local Impact Report [REP1-079] and Written Representation [REP1-080]. This is due to the Applicant’s confirmation that our requested mode share sensitivity tests



have not been carried out; and our related concerns over the ambitious fifteen-fold increase in air passenger coach services for Kent that support the 55% public transport mode share target of the Surface Access Commitments [REP3-028]. Additionally, the Applicant quotes Table 12.9.27 of Environmental Statement Chapter 12: Traffic and Transport [AS-076]) to demonstrate impacts at M25 Junction 7 (M23) would be limited. This table states the N-S and E-W journey times show no change or minor increases with Project, but as we state in our Local Impact Report [REP1-079] "*both M25 and M23 journey time routes travel straight through M25 Junction 7 (M23) on the main line and do not use these merges & diverges, which cater for movements to and from Kent*".

#### *Surface Transport Impact D – downgraded to Negative Impact*

KCC confirms its position on Surface Transport Impact D (Public Transport: Kerbside Provision for Coaches) has now been downgraded to negative following the Applicant's confirmation that "*Detailed assessment of the forecourt performance using the VISSIM models has not been undertaken as part of the DCO assessment*" on page 255 of document 10.15 Applicant's Response to the Local Impact Reports [REP3-078]. The Applicant's 55% public transport mode share targets assume a nearly three-fold increase in total air passenger coach services between 2016 and 2047 with Project, supported by a fifteen-fold increase in air passenger coach services for Kent. KCC is concerned that the significant dwell times associated with coaches catering to air passengers (boarding & alighting with luggage) will limit the capacity of the finite kerb space available, in turn causing congestion on airport service roads, which may affect all roadside access. The Applicant's response notes the availability of "*a coach park close to South Terminal*", but this appears to involve a walk of over 200m, unprotected from the weather.

#### *Surface Transport Impact E – upgraded to Neutral Impact*

KCC confirms its position on Surface Transport Impact E (Public Transport: Proposed Coach Services) has now been upgraded to neutral following the Applicant's confirmation on page 256 of document 10.15 Applicant's Response to the Local Impact Reports [REP3-078] that the final routings for the coach services to be supported under the Surface Access Commitments [REP3-028] will be subject to engagement with "*operators and with local authorities, including in respect of final service pattern, route and calling points*". KCC notes that on page 8 of control document Surface Access Commitments [REP3-028] Commitment 5 states the Applicant "*recognises that agreement with operators and/or local authorities will be needed on the detail of each route*".

Yours sincerely,

**Simon Jones**

Corporate Director – Growth, Environment and Transport