



Gatwick Airport Northern Runway Project

Statement of Common Ground Between Gatwick Airport Limited and Kent County Council – Tracked Version

Book 10

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1 Introduction

- 1.1.1 This Statement of Common Ground (SoCG) has been prepared in support of the examination phase for the proposed Gatwick Northern Runway Project (NRP). The Application was made by Gatwick Airport Limited (the Applicant) to the Secretary of State for the Department for Transport (the Secretary of State) pursuant to Section 37 of the Planning Act 2008 (PA 2008).
- 1.1.2 The Application comprises alterations to the existing northern runway which, together with the lifting of the current restrictions on its use, would enable dual runway operations. It also includes the development of a range of infrastructure and facilities which, with the alterations to the northern runway, would enable an increase in the airport's passenger throughput capacity. This includes substantial upgrade works to certain surface access routes which lead to the airport. A full description of the Proposed Development is included in **ES Chapter 5: Project Description** (Doc Ref. 5.1).
- 1.1.3 SoCGs are an established means in the planning process of allowing all parties to identify and focus on specific issues that may need to be considered during the Examination. The purpose and possible content of SoCG is detailed in the Department for Communities and Local Government's guidance entitled 'Planning Act 2008: examination of applications for development consent' (2015), stating:
- "A statement of common ground is a written statement prepared jointly by the applicant and another party or parties, setting out any matters on which they agree. As well as identifying matters which are not in real dispute, it is also useful if a statement identifies those areas where agreement has not been reached. The statement should include references to show where those matters are dealt with in the written representations or other documentary evidence."*
- 1.1.4 The SoCGs between the Applicant and the local authorities comprises several documents, to which this document is one. The Statement of Commonality provides details of the structure and status of the SoCG between all the relevant Interested Parties, including the local authorities. Naturally, the level of detail across the suite of SoCG varies to reflect the nature and complexity of the matter, as well as the position between the parties.
- 1.1.5 This document solely relates to matters between the Applicant and Kent County Council. A summary of the meetings and correspondence that has taken place between the parties is detailed in **Appendix 1** of this document.
- 1.1.6 The engagement between the parties across the breadth of matters is ongoing. Therefore, the SoCG is an evolving document and the detailed wording within it is still being discussed in detail between the parties. Future iterations will be submitted at each deadline; and both parties reserve the right to supplement the matters identified as discussions progress, to ensure it is comprehensive and up to date.
- 1.1.7 This SoCG has been produced to confirm to the Examining Authority (ExA) where agreement has been reached between the parties, and where agreement has not (yet) been reached, and is presented in a tabular form. This SoCG does not seek to replicate information that is available elsewhere, either within the Application and/or Examination documents, referring out where

appropriate. The terminology used within the SoCG to reflect the status between the parties is either:

- “Agreed” to indicate where a matter has been resolved to the satisfaction of the parties.
- “Not Agreed” to indicate a final position where parties cannot agree.
- “Under discussion” to indicate where matters are subject of on-going discussion with the aim to either resolve or refine the extent of disagreement between the parties.

1.1.8 It can be assumed that any matters not specifically referred to in Section 2 of this SoCG are not of material interest or relevance to Kent County Council; and therefore, have not been the subject of any discussions between the parties or have been previously discussed and addressed through the DCO process. As such, those matters should be assumed to be agreed, unless otherwise raised in due course by any of the parties.

2 Current Position

2.1. Agricultural Land Use and Recreation

2.1.1 **Table 2.1** sets out the position of both parties in relation to agricultural land use and recreation matters.

Table 2.1 Statement of Common Ground – Agricultural Land Use and Recreation Matters

Reference	Matter	Stakeholder Position	Gatwick Airport Limited Position	Signposting	Status
<i>There are no issues relating to Agricultural Land Use and Recreation in this Statement of Common Ground.</i>					

2.2. Air Quality

2.2.1 Table 2.1 sets out the position of both parties in relation to air quality matters.

Table 2.2+ Statement of Common Ground – Air Quality Matters

Reference	Matter	Stakeholder Position	Gatwick Airport Limited Position	Signposting	Status
<i>There are no issues related to Air Quality in this Statement of Common Ground.</i>					

2.3. Capacity and Operations

2.3.1 Table 2.3 sets out the position of both parties in relation to capacity and operations matters.

Table 2.3 Statement of Common Ground – Capacity and Operations Matters

Reference	Matter	Stakeholder Position	Gatwick Airport Limited Position	Signposting	Status
Please see the joint Statement of Common Ground prepared in relation to Capacity and Operations (Doc Ref. 10.1.18). There are no issues related to Capacity and Operations in this Statement of Common Ground.					

2.4. Climate Change

2.4.1 **Table 2.4** sets out the position of both parties in relation to climate change matters.

Table 2.4 Statement of Common Ground – Climate Change Matters

Reference	Matter	Stakeholder Position	Gatwick Airport Limited Position	Signposting	Status
		KCC suggests that existing comment 2.11.3.1 is related more closely to Climate Change matters and should be relocated here.			
<i>There are no issues related to Climate Change in this Statement of Common Ground.</i>					

2.5. Construction

2.5.1 Table 2.5 sets out the position of both parties in relation to construction matters.

Table 2.5 Statement of Common Ground – Construction Matters

Reference	Matter	Stakeholder Position	Gatwick Airport Limited Position	Signposting	Status
<i>There are no issues related to Construction in this Statement of Common Ground.</i>					

2.6. Cumulative Effects and Interrelationships

2.6.1 Table 2.6 sets out the position of both parties in relation to cumulative effects and interrelationships matters.

Table 2.6 Statement of Common Ground – Cumulative Effects and Interrelationships Matters

Reference	Matter	Stakeholder Position	Gatwick Airport Limited Position	Signposting	Status
<i>There are no issues relating to Cumulative Effects and Interrelationships within this Statement of Common Ground.</i>					

2.7. Draft DCO and Explanatory Memorandum

2.7.1 Table 2.7 sets out the position of both parties in relation to Draft DCO and Explanatory Memorandum matters.

Table 2.7 Statement of Common Ground – Draft DCO and Explanatory Memorandum Matters

Reference	Matter	Stakeholder Position	Gatwick Airport Limited Position	Signposting	Status
<i>There are no issues relating to the Draft DCO and Explanatory Memorandum within this Statement of Common Ground.</i>					

2.8. Ecology and Nature Conservation

2.8.1 Table 2.8 sets out the position of both parties in relation to ecology and nature conservation matters.

Table 2.8 Statement of Common Ground – Ecology and Nature Conservation Matters

Reference	Matter	Stakeholder Position	Gatwick Airport Limited Position	Signposting	Status
<i>There are no issues relating to Ecology and Nature Conservation within this Statement of Common Ground.</i>					

2.9. Forecasting and Need

2.9.1 Table 2.9 sets out the position of both parties in relation to forecasting and need matters.

Table 2.9 Statement of Common Ground – Forecasting and Need Matters

Reference	Matter	Stakeholder Position	Gatwick Airport Limited Position	Signposting	Status
<u>Please see the joint Statement of Common Ground prepared in relation to Forecasting and Need (Doc Ref. 10.1.19).</u>					
2.9.1.1	Needs Case	<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 (Deadline 1): KCC's strategic position remains that the overall requirement for increased capacity at UK airports should be accomplished at Heathrow.</p> <p>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.</p> <p>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.</p> <p>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.</p> <p>Updated Position (Deadline 3): 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.</p>	<p>The methodology involves extrapolating observed trends in aircraft size, occupancy and in peak spreading to the release of new capacity at Gatwick. That exercise is underpinned by known demand and forecast market growth. It is inherently robust, compared with an alternative more theoretical approach.</p> <p>GAL has demonstrated that the capacity increase delivered by the NRP is not overstated, operating procedures and performance.</p> <p>The assessment of national impacts follows DfT's TAG and assesses costs and benefits from the scheme. While this type of assessment is not required for private sector schemes such as the NRP, we use TAG welfare analysis as it is considered a useful framework to assess and present the economic impacts (costs and benefits) of the Project that are additional at the national level. Benefits included in the Net Present Value calculations exclude impacts that would potentially double-count benefits (e.g. trade benefits are quantified but not included in the NPV).</p>	Needs Case Appendix 1– National Economic Impact Assessment [APP-251]	Matter under discussion

		<u>KCC's request remains unchanged. Further detail has been provided in the Written Representation.</u>			
2.9.1.2	Intensification of the main runway at Gatwick	<p>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.</p> <p>Updated position (Deadline 1): Whilst KCC appreciates there is currently a limit of 55 movements per hour (mph) on the main runway, we assume the split of these movements is 50:50 arrivals/departures. If the northern runway is to be used for departures only, then clarity is needed on the proposed breakdown of arrivals and departures with the Northern Runway in operation. If a 50:50 split was still to apply, then this would result in an increase in arrivals and additional impacts on Kent. Clarification on this is requested from the Applicant.</p> <p>Furthermore, KCC notes that whilst there would be a capacity limitation of 69 movements per hour, this is only until the outputs of the Future Airspace Strategy Implementation South (FASI-S) Airspace Change Process are implemented, where movement per hour capacity will increase.</p>	<p>KCC's comments are inconsistent — on the one hand suggesting that capacity has been over-stated but then suggesting the opposite.</p> <p>As has been explained through the TWGs, the use of the main runway would reduce below its current level of 55mph in order to enable the sequencing of take-offs with the northern runway. This would enhance the resilience of the main runway operations. However, capacity limitations are also inherent in the structure of airspace, limiting the overall capacity to an estimated 69 movements per hour. There is, therefore, no under estimation of capacity or impact.</p>	n/a	Matter under discussion

2.10. Geology and Ground Conditions

2.10.1 **Table 2.10** sets out the position of both parties in relation to geology and ground conditions matters.

Table 2.10 Statement of Common Ground – Geology and Ground Conditions Matters

Reference	Matter	Stakeholder Position	Gatwick Airport Limited Position	Signposting	Status
<i>There are no issues relating to Geology and Ground Conditions within this Statement of Common Ground.</i>					

2.11. Greenhouse Gases

2.11.1 Table 2.11 sets out the position of both parties in relation to greenhouse gases matters.

Table 2.11 Statement of Common Ground – Greenhouse Gases Matters

Reference	Matter	Stakeholder Position	Gatwick Airport Limited Position	Signposting	Status
Baseline					
There are no issues relating to the baseline for this topic within this Statement of Common Ground.					
Assessment Methodology					
There are no issues relating to the assessment methodology for this topic within this Statement of Common Ground.					
Assessment					
		KCC suggests that existing comment 2.11.3.1 is related more closely to Climate Change matters and should be relocated to Table 2.4.			
2.11.3.1	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 (Deadline 1): The Applicant's proposals refer to the Government's Jet Zero Strategy. However, the Climate Change Committee (CCC) has several concerns around the Jet Zero Strategy and states that the strategy carries considerable risks in relation to the aviation sectors' contribution to emission abatement to the Sixth Carbon Budget.</p> <p>Jet Zero's reliance on new technologies is high risk and the Applicant should assess all risks that may occur, particularly in this current scenario where the CCC raise real issues with the current strategy.</p> <p>It is currently unclear within the Applicant's proposals how they are complying with the Climate Change Committee's recommendations. As such, KCC remains concerned that this expansion cannot be justified in the wider context of the global requirement to reduce CO2 emissions.</p> <p>Updated position (Deadline 5): Unchanged Negative Impact.</p> <p><u>Further clarification is required from the Applicant that the Jet Zero 'high ambition' scenario has been assessed and deemed viable by the Climate Change Commission.</u></p> <p><u>Further clarification is required that GAL's economic argument has incorporated the potential costs arising from climate risks if policy frameworks fail. A weakening of the economic argument could undermine the stated benefits of global connectivity and levelling up in the UK.</u></p>	<p>The Jet Zero strategy sets out a range of these potential rates of trend (on efficiency, SAF, and novel aircraft technologies) and these rates (based on the High Ambition scenario forming the basis of UK Government strategy and commitments) have been used to model the future emissions from aircraft as set out in Section 3.1 of ES Appendix 16.9.4.</p> <p>It is not for the applicant or for the examination to assess risks on the basis that government policy will fail.</p> <p>It is apparent that government is committed to its net zero target and to closely monitoring aviation and other trajectories to ensure compliance.</p> <p>Updated position (April 2024) <u>The Government responded directly to the 2022 recommendation in its Government Response of March 2023. CCC Annual Progress Report March 2023</u></p> <ul style="list-style-type: none"> <u>"197. We remain committed to growth in the aviation sector where it is justified. Our analysis in the Jet Zero Strategy shows that the sector can achieve net zero carbon emissions from aviation without the government needing to intervene directly to limit aviation growth. Our scenarios show that we can achieve our targets by focusing on new fuels, technology, and carbon markets and removals with knock-on economic and social benefits. Our 'high ambition' scenario has residual emissions of 19 MtCO2e in 2050, compared to 23 MtCO2e residual emissions in the CCC's Balanced Pathway.</u> <u>Airport growth has a key role to play in boosting our global connectivity and levelling up in the UK. Our existing policy</u> 	Section 3.1 of ES Appendix 16.9.4 Assessment of Aviation Greenhouse Gas Emissions [APP-194]	Matter under discussion

			<p><u>frameworks for airport planning provide a robust and balanced framework for airports to grow sustainably within our strict environmental criteria. We do not, therefore, consider restrictions on airport growth to be a necessary measure.”</u></p>		
<p>2.11.3.2</p>	<p>Emissions</p>	<p><u>KCC’s concern previously outlined is maintained. It is currently unclear how the proposals are complying with the Climate Change Committee’s recommendations as detailed further in KCC’s written representation.</u></p> <p><u>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.</u></p> <p><u>Updated position (Deadline 5): Unchanged Inconclusive Impact.</u></p> <p><u>As stated above, further clarification is required from the Applicant that the Jet Zero ‘high ambition’ scenario has been assessed and deemed viable by the Climate Change Commission.</u></p> <p><u>Further clarification is required that the impact of extra emissions from the Project on society has been considered. The cost of one tonne of carbon on society, according to the Government’s Green Book, ranges from £276 per tonne in 2029 to £378 per tonne in 2050. When calculating the extra cost to society due to the emissions from this project (using the Government’s carbon values), the annual cost ranges from £185 million to £343 million. From 2029 to 2050, the cumulative social impact cost of the extra carbon emissions released from this project totals £5.93 billion.</u></p>	<p>The CCC was established under the Climate Change Act 2008 to provide an advisory role to Government on emissions targets and to report to Parliament on progress made in reducing greenhouse gas emissions in the context of those targets. The CCC recommends 5-year national Carbon Budgets to achieve the Government’s target of net zero by 2050. The CCC publishes annual progress reports which contain recommendations to Government. Government publishes a formal response each year to the Progress Reports and recommendations. The Government’s most recent response responded to the Progress Report 2022.</p> <p>The Government responded directly to the 2022 recommendation in its Government Response of March 2023, stating:</p> <ul style="list-style-type: none"> • <u>“We remain committed to growth in the aviation sector where it is justified. Our analysis in the Jet Zero Strategy shows that the sector can achieve net zero carbon emissions from aviation without the government needing to intervene directly to limit aviation growth. Our scenarios show that we can achieve our targets by focusing on new fuels, technology, and carbon markets and removals with knock-on economic and social benefits. Our ‘high ambition’ scenario has residual emissions of 19 MtCO₂e in 2050, compared to 23 MtCO₂e residual emissions in the CCC’s Balanced Pathway.</u> • <u>Airport growth has a key role to play in boosting our global connectivity and levelling up in the UK. Our existing policy frameworks for airport planning provide a robust and balanced framework for airports to grow sustainably within our strict environmental criteria. We do not, therefore, consider restrictions on airport growth to be a necessary measure.”</u> <p>Furthermore, the UK Government in October 2023 responded to the CCC confirming its position that:</p> <ul style="list-style-type: none"> • <u>“We will monitor progress against our emissions reduction trajectory 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, five years after publication of the Strategy in 2022.</u> 		<p><u>Under discussion</u></p>

			<ul style="list-style-type: none"> The Jet Zero Strategy sets out details on how the aviation sector can achieve net zero without government intervening directly to limit aviation growth. DfT analysis shows that in all modelled scenarios we can achieve our net zero targets by focusing on new fuels and technology, rather than capping demand, with knock-on economic and social benefits. If we find that the sector is not meeting the emissions reductions trajectory, we will consider what further measures may be needed to ensure that the sector maximises in-sector reductions to meet the UK's overall 2050 net zero target." 		
2.11.3.3	Aviation Emissions	<p>KCC are concerned about the proposed aviation emissions associated with this proposal. 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> <p>Updated position (Deadline 5): Unchanged Inconclusive Impact.</p> <p>KCC notes the impact of the Project, with regard to Greenhouse Gases, as set out in Table 16.9.13 of DCO document 5.1 Environmental Statement Chapter 16: Greenhouse Gases [REP4-005]. We note the significant loading factor caused by the inclusion of emissions from international aviation which have been included – for the first time - within the Sixth Carbon Budget period. The omission of international aviation data in earlier budget periods does not equate with an absence of real-world emissions from this source. What impact would the inclusion of international data in earlier Budgets have on GAL's analysis?</p>	<p>The assessment has considered the impact of aviation emissions within the context of the UK carbon budgets. The extent to which these relate to requirements under the Paris Agreement will be provided at Deadline 4.</p> <p>The impact of the Project, with regard to Greenhouse Gases, is set out in Table 16.9.13 of Chapter 16 within the Environmental Statement.</p>	ES Chapter 16 Greenhouse Gases [APP-041]	Under discussion
Mitigation and Compensation					
<i>There are no issues relating to mitigation and compensation for this topic within this Statement of Common Ground.</i>					
Other					
<i>There are no other issues relating to this topic within this Statement of Common Ground.</i>					

2.12. Health and Wellbeing

2.12.1 Table 2.12 sets out the position of both parties in relation to health and wellbeing matters.

Table 2.12 Statement of Common Ground – Health and Wellbeing Matters

Reference	Matter	Stakeholder Position	Gatwick Airport Limited Position	Signposting	Status
<i>There are no issues relating to Health and Wellbeing within this Statement of Common Ground.</i>					

2.13. Historic Environment

2.13.1 Table 2.13 sets out the position of both parties in relation to historic environment matters.

Table 2.13 Statement of Common Ground – Historic Environment Matters

Reference	Matter	Stakeholder Position	Gatwick Airport Limited Position	Signposting	Status
<i>There are no issues relating to Historic Environment within this Statement of Common Ground.</i>					

2.14. Landscape, Townscape and Visual

2.14.1 Table 2.14 sets out the position of both parties in relation to landscape, townscape and visual matters.

Table 2.14 Statement of Common Ground – Landscape, Townscape and Visual Matters

Reference	Matter	Stakeholder Position	Gatwick Airport Limited Position	Signposting	Status
<i>There are no issues relating to Landscape, Townscape and Visual in this Statement of Common Ground.</i>					

2.15. Major Accidents and Disasters

2.15.1 Table 2.15 sets out the position of both parties in relation to major accidents and disasters matters.

Table 2.15 Statement of Common Ground – Major Accidents and Disasters Matters

Reference	Matter	Stakeholder Position	Gatwick Airport Limited Position	Signposting	Status
<i>There are no issues relating to Major Accidents and Disasters within this Statement of Common Ground.</i>					

2.16. Noise and Vibration

2.16.1 Table 2.16 sets out the position of both parties in relation to noise and vibration matters.

Table 2.16 Statement of Common Ground – Noise and Vibration Matters

Reference	Matter	Stakeholder Position	Gatwick Airport Limited Position	Signposting	Status
Baseline					
There are no issues relating to the baseline for this topic within this Statement of Common Ground.					
Assessment methodology					
There are no issues relating to the assessment methodology for this topic within this Statement of Common Ground.					
Assessment					
2.16.3.1	Noise - Aircraft Noise over Kent – impact on communities, the AONB and heritage sites	<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 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. 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 (Deadline 1): KCC disagree with GAL's statement that a detailed assessment of the likely effects of air noise and overflight in Kent has been provided.</p> <p>The Applicant's discussion on overflights is lacking any kind of information on how communities would be affected by the proposed expansion. Figure 14.9.31 [APP-065] shows analysis where areas would experience overflights from both the Main and Northern Runway in 2032. Compared to Figure 14.6.7 [APP-063], which illustrates the 2019 Baseline overflight levels, 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.</p> <p>However, GAL's submission does not contain any detailed information about aircraft noise at Tunbridge Wells as it is outside any of the contours that have been produced. The maps produced by the Applicant to show 'overflights' from 2019 (Figure 14.6.7 to 14.6.8 of APP-063) and 2032 (Figure 14.9.31 of APP-065) are of such coarse resolution that it is hard to draw any meaningful information from them. Additionally, the figure from 2032 does not just cover Gatwick Airport but covers all aircraft activity</p>	<p>The ES provides a detailed assessment of the likely effects of air noise and overflights in Kent, including on the AONB and heritage assets. The primary comparison upon which these assessments are made is between the levels with the Project and the levels without it (called the future baseline) it in a particular future year. The ES also reports the changes between levels with the Project and the 2019 baseline, as referred to in this representation. In both comparisons the increases in noise with the Project in Kent are predicted to be small, less than 1dB in $L_{eq\ 16\ hr\ day}$ and $L_{eq\ 8\ hour\ night}$. Consequently, these impacts in Kent are assessed as slight and not significant.</p> <p>Updated Position (April 2024): The Applicant can clarify that the overflight mapping includes the increases in arrivals as well as departures facilitated by the Project.</p> <p>ES Appendix 14.9.2 Air Noise Modelling [APP-172] gives the methodology used in the overflight modelling. Paragraph notes:</p> <p><i>The largest effect of the Project in terms of increasing flight numbers in the busy summer period is forecast to be in 2032 when there would be increases of approximately 10% at night and 19% in the day compared to the 2032 baseline. As a conservative approximation the 24 hour flight numbers were increased by 20%.</i></p> <p>Given that there is no change in the routing of aircraft in the Tunbridge Wells area, these are the expected increases in the number of overflights.</p> <p>In addition to the noise contours provided in the ES, the Applicant has published the noise modelling results on an online air noise viewer as referred to in paragraph 14.9.80 of the ES. Using this viewer it can be seen that in areas to the West of Tunbridge Wells</p>	<p>ES Chapter 14: Noise and Vibration [APP-039]</p> <p>ES Appendix 14.9.2: Air Noise Modelling [APP-172]</p> <p>5.2 ES Noise and Vibration Figures - Part 1 [APP-063]</p> <p>5.2 ES Noise and Vibration Figures – Part3 [APP-065]</p> <p>ES Landscape, Townscape and Visual Resources Figures – Part 2 [REP2-007]</p>	Matter under discussion

below 7,000 feet around Gatwick, which dilutes the impact from the increased movements as a result of the proposed expansion.

Furthermore, 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. For example, an area might currently experience 101 overflights a day but with the Northern Runway in place this would increase to 199, the location would be represented the same on the two maps, but communities on the ground would experience an additional 98 overflights per day.

The Applicant is requested to update the overflights assessment so meaningful information can be obtained regarding how communities would be affected by increased aircraft movements.

It must also be noted that the proposals focus mainly on aircraft departing the airport, but little information is provided regarding aircraft arriving at Gatwick. The Applicant makes clear their proposals are for departing aircraft only to utilise the Northern Runway, however little consideration has been given to the fact the Project could create extra capacity on the existing main runway and allow GAL the opportunity to increase the number of larger aircraft arriving and departing from the main runway.

Updated Position (Deadline 3): 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. 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.

Updated Position (Deadline 5): KCC notes the Applicant’s acknowledgement that the Northern Runway Project would result in an increase in arrivals, however clarification has not been provided regarding the ratio of the number of arrivals and departures with the project in place.

Furthermore, 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.

Leq 16 hour noise levels will be below 51 dB and Leq hour night noise levels will be below 45 dB. The number of noise events on an average summer day above LMax 65dB will be less than 20 and number of events at night above LMax 60 dB will be less than 10, so the noise effects of the Project will not be significant.

A tranquillity study has been undertaken within **ES Chapter 8: Landscape, Townscape and Visual Resources** [APP-033] in accordance with an appropriate methodology (to accommodate specific criteria in CAA CAP1616 Appendix B, para B30 and B56). Frequency of aircraft movements and general orientation of flights are illustrated using heat maps in **ES Landscape, Townscape and Visual Resources Figures – Part 2** [REP2-007] Figures 8.6.3 to 8.6.7 together with nationally designated landscapes. The assessment is based on the increase in overflying aircraft up to 7000 ft above local ground level as a result of the Project, compared to the future baseline scenario in 2032 (See Table 8.9.1 for summary of representative assessment locations and overflight numbers including Knole Park). It is considered that the increase in overflights will be barely perceptible to some people and imperceptible to others. The magnitude of change is considered to range from No Change to Negligible and the level of effect would range from No Change to Minor adverse. Whilst an adverse effect on the perception of tranquillity has been identified it is not considered to constitute significant harm to this perceptual quality.

2.16.3.2	Noise – Overflight LIR - Noise Impact A	<p>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). 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. 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 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> <p>Updated Position (Deadline 5): See above.</p>	<p>Please see the response above that replies to this.</p>		
2.16.3.3	Noise – go around LIR - Noise Impact B	<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. KCC would further encourage the Applicant to work with airlines to reduce the need for go arounds as much as feasibly possible.</p> <p>Updated Position (Deadline 5): KCC notes the Applicant's latest position but would encourage more to be done to reduce the need for go arounds, instead of simply preventing a significant increase to existing numbers.</p>	<p>Table 14.2.1 of ES Chapter 14 notes: <i>The Project includes eight new exit/entrance taxiways, plus the EATs and has been designed so that the numbers of go-arounds do not significantly increase. As such, noise disturbance from go-arounds is not expected to increase and accordingly these are not assessed.</i></p>	<p>ES Chapter 14: Noise and Vibration [APP-039]</p>	<p>Under discussion</p>
2.16.3.4	Noise – night noise LIR – Noise Impact C	<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>	<p>The noise assessment reported in chapter 14 of the ES provides noise modelling for annual Lden and Lnight noise levels. Paragraph 14.9.139 compares the extent to which these increase with the extent to which that summer season noise contours increase with the project and concludes: <i>Overall, this suggests that any seasonality in the way the extra capacity delivered by the Project is used has little effect on noise levels across seasons.</i></p>	<p>ES Chapter 14: Noise and Vibration [APP-039]</p>	<p>Agreed</p>
2.16.3.5	Tunbridge Wells – Noise Impact D	<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>Updated Position (Deadline 5): KCC's position remains unchanged. The overflight mapping does not illustrate the true degree of change expected in</p>	<p>Please see our response to 2.16.3.1 above that provides this information.</p>		<p>Under discussion</p>

		the Tunbridge Wells area as only a map showing overflights from all airports in 2032 is provided.			
2.16.3.6	Sevenoaks – Noise Impact E	Further information on arrival impacts is requested from the Applicant. Updated Position (Deadline 5): KCC notes the Applicant's acknowledgement that the Northern Runway Project would result in an increase in arrivals, however clarification has not been provided regarding the ratio of the number of arrivals and departures with the project in place.	Please see our response to 2.16.3.1 above that provides this information.		Under discussion
2.16.3.7	Community representative locations – Noise Impact F	KCC would request the Applicant to undertake further assessment of additional community representative locations (other than at Chiddingtone Church). Locations should be identified in other areas of Sevenoaks, such as Penshurst and Edenbridge, Updated Position (Deadline 5): KCC is disappointed the Applicant is not willing to undertake any further community representative assessments. Communities in Penshurst and Edenbridge already suffer from intolerable noise impacts as a result of overflight from Gatwick, and it is imperative the increase in noise as a result of the Northern Runway Project is thoroughly assessed through the Examination.	These seven Community Representative Locations were selected so as to represent the most populated areas affected by noise. Together they represent approximately half of the population within the 2032 Leq, 16 hour day 51 dB contour. Edenbridge and Penshurst are not within the day or night LOAEL contours. The air noise online viewer has been prepared to help interested parties in any area affected to understand the noise changes in their area, as referred to in our response to 2.16.3.1 above.		Not agreed
2.16.3.8	Noise Envelope	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. Updated Position (Deadline 5): KCC's position remains unchanged and we continue to have concerns regarding the robustness of the proposed noise envelope.	The Applicant has responded to similar criticisms of the noise envelope proposals from other local authorities, please refer to for example the SOCG with Crawley Borough Council which addresses these points. The noise envelope proposed in the DCO follows the guidance provided in CAP1129 including the need to consult on its development. That consultation through the Noise Envelope Group was structured around the contents of CAP1129, see page 93 to 231 of ES Appendix 14.9.9 Report on Engagement on the Noise Envelope [APP-179]. ES Appendix 14.9.5 Air Noise Envelope Background [APP-175] chapter 2 summarises the CAP1129 guidance and explains how each of the options was considered. ES Appendix 14.9.7: The Noise Envelope [APP-177] provides the noise envelope proposed and in Chapter 3 explains how policy and the CAA guidance was followed. ES Appendix 14.9.8 Noise Envelope Group Output Report [APP-178] summarises the results of the consultation in 2022. Through this process the Applicant has developed a robust noise envelope and does not feel any additional work is required.	ES Appendix 14.9.9 Report on Engagement on the Noise Envelope [APP-179] ES Appendix 14.9.5 Air Noise Envelope Background [APP-175] ES Appendix 14.9.7: The Noise Envelope [APP-177] ES Appendix 14.9.8 Noise Envelope Group Output Report [APP-178]	Not agreed

Mitigation and Compensation
<i>There are no issues relating to mitigation and compensation for this topic within this Statement of Common Ground.</i>
Other
<i>There are no other issues relating to this topic within this Statement of Common Ground.</i>

2.17. Planning and Policy

2.17.1 Table 2.17 sets out the position of both parties in relation to planning and policy matters.

Table 2.17 Statement of Common Ground – Planning and Policy Matters

Reference	Matter	Stakeholder Position	Gatwick Airport Limited Position	Signposting	Status
<i>There are no issues relating to Planning and Policy in this Statement of Common Ground.</i>					

2.18. Project Elements and Approach to Mitigation

2.18.1 **Table 2.18** sets out the position of both parties in relation to project elements and approach to mitigation matters.

Table 2.18 Statement of Common Ground – Project Elements and Approach to Mitigation Matters

Reference	Matter	Stakeholder Position	Gatwick Airport Limited Position	Signposting	Status
<i>There are no issues relating to Project Elements and Approach to Mitigation in this Statement of Common Ground.</i>					

2.19. Socio-Economics and Economics

2.19.1 Table 2.19 sets out the position of both parties in relation to socio-economics and economics matters.

Table 2.19 Statement of Common Ground – Socio-Economics and Economics Matters

Reference	Matter	Stakeholder Position	Gatwick Airport Limited Position	Signposting	Status
Baseline					
There are no issues relating to the baseline for this topic within this Statement of Common Ground.					
Assessment methodology					
There are no issues relating to the assessment methodology for this topic within this Statement of Common Ground.					
Assessment					
2.19.3.1	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 (Deadline 1): KCC welcomes further discussion on this matter but at present the Council’s view remains unchanged.</p> <p>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 which KCC currently view to be disproportionate to the possible economic benefits in Kent.</p> <p>Updated Position (Deadline 3): <u>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.</u></p>	<p>Further detail has been provided through the Topic Working Groups on the proposed Employment, Skills and Business Strategy Implementation Plan and how it will be spatially targeted. There will be further TWGs on this and GAL is happy to discuss further with KCC.</p> <p>Updated position (April 2024): <u>A draft ESBS Implementation Plan has been provided and will be updated iteratively. Ultimately, it will feature measures to boost local employment and support upskilling and training as well as activity to promote the economy of the region, including Kent. The proposed governance of the ESBS includes a proposed multi-agency Steering Group that will approve the Implementation Plan and oversee its delivery.</u></p>	<p>ES Appendix 17.8.1: Employment, Skills and Business Strategy [APP-198]</p> <p><u>Draft Section 106 Agreement Annex: ESBS Implementation Plan [REP3-069]</u></p>	Matter under discussion
Mitigation and Compensation					
There are no issues relating to mitigation and compensation for this topic within this Statement of Common Ground.					
Other					
There are no other issues relevant to this topic in this Statement of Common Ground.					

2.20. Traffic and Transport

2.20.1 Table 2.20 sets out the position of both parties in relation to traffic and transport matters.

Table 2.20 Statement of Common Ground – Traffic and Transport Matters

Reference	Matter	Stakeholder Position	Gatwick Airport Limited Position	Signposting	Status
Baseline					
There are no issues relating to the baseline for this topic within this Statement of Common Ground.					
Assessment methodology					
There are no issues relating to the assessment methodology for this topic within this Statement of Common Ground.					
Assessment					
There are no issues relating to the assessment for this topic within this Statement of Common Ground.					
Mitigation and Compensation					
2.20.4.1	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 (Deadline 1): KCC notes from Transport Assessment [AS-079] Table 11.3.4 (and Annex B Tables 128 & 178) that the 55% public transport mode share targets assume a fifteen-fold increase in air passenger coach services for Kent between 2016 and 2047. With an ambitious target such as this, KCC remains concerned that Route 4 will not extend to Ebbsfleet as first proposed and will no longer extend into Kent.</p> <p>KCC appreciates that planning and funding support for additional coach services to Gatwick would be a positive impact for Kent travellers but is concerned that capacity provision for this additional traffic is unclear in the Transport Assessment [AS-079]. 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>Updated Position (Deadline 3): KCC's concern previously outlined is maintained. KCC further requests: - 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. KCC 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. Furthermore, KCC have concerns around</p>	<p>The Surface Access Commitments document sets out bus and coach services identified and included in the modelling work. The routes identified are based on the likely catchments to maximise the potential of achieving the committed mode shares. GAL is committed to provide reasonable financial support in relation to the services, or others which result in an equivalent level of public transport accessibility. Details of new routes will be developed in conjunction with bus operators and relevant stakeholders in due course.</p> <p>Updated position (April 2024): The assessment of the Project set out in the Transport Assessment [REP3-058] is based on the bus and coach routes set out in ES Appendix 5.4.1: Surface Access Commitments [REP3-028] and does not show that mitigation is required on the specific routes proposed by KCC. The Applicant will nevertheless be engaging with bus operators and Kent County Council on the detail of future routes as part of delivering the SACs. As set out in The Applicant's Response to Local Impact Reports [REP3-078], the Applicant has a successful record of engaging with bus and coach operators to identify and deliver service improvements.</p> <p>Schedule 3 of the Draft S106 Agreement [REP2-004] sets out the funding arrangements for surface access.</p> <p>The Applicant has provided a response related to sensitivity testing in its answer to question TT.1.13 in The Applicant's Response to the Examining Authority's Questions (EXQ1) [REP3-104]. During the development of model forecasts, and through discussions with key stakeholders including National Highways and SCC and WSCC, some sensitivity analysis was undertaken to help understand specific topics in more detail and to help build</p>	ES Appendix 5.4.1: Surface Access Commitments [APP-090]	Matter under discussion

[what constitutes “reasonable financial support”](#). 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](#).

[We request a sensitivity test on public transport mode share forecasts](#). [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](#).

Updated Position (Deadline 5): [KCC’s previous concerns are maintained, although as stated in our Deadline 4 Submission \[REP4-055\], we have revised our position on the planning and provision of coach services 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 also 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”](#).

[Our position on the issue of kerb space provision 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 – including the crossing of a busy access road](#).

[confidence in the forecasting process, assumptions and outputs. As an example, through discussions with National Highways, a test which explored a 10% increase in airport traffic was undertaken to understand the sensitivity of the model in terms of performance of the network, particularly at M23 Junction 9, and the resilience of the proposed highway works to traffic flows greater than those forecast through the core modelling process](#).

[The Applicant has also undertaken sensitivity testing for post-Covid travel behaviour, following guidance issued by the DfT in an updated version of TAG Unit M4. These sensitivity tests for the strategic model are reported in Accounting for Covid-19 in Transport Modelling \[AS-121\]. Post-Covid sensitivity tests have also been undertaken using the VISSIM model, to address requests from National Highways, which are reported in Post-Covid VISSIM Sensitivity Tests for 2032 and 2047 \[REP3-108\] submitted at Deadline 3](#).

[KCC acknowledges that the Applicant has undertaken some forms of sensitivity testing – but not those that address KCC 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 \[REP3-028\]. In our Deadline 4 Submission \[REP4-055\], we reiterate our request for the “first 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.](#)

[KCC acknowledges the Applicant's referral to the Section 106 \(S106\) agreement \[REP2-004\] with regard to the provision of “reasonable financial support” to new coach services to Gatwick. However, neither KCC nor the coach operators will be signatory to the S106 and must therefore rely on the wording of the Surface Access Commitments \(SAC\) \[REP3-028\] which is a control document. We appreciate the efforts of National Highways towards strengthening the text of the SAC and have the following additional comments:](#)

- [KCC would prefer to see the Commitment 5 text of paragraphs \(1\) and \(2\) state that the Applicant will engage with "operators and local authorities" rather than "and/or". KCC public transport team would like to be made aware of all Kent-Gatwick coach planning initiatives, so they can consider and advise on any wider strategic impacts and hopefully contribute positively to the route planning process.](#)
- [KCC would prefer to see the text of Commitment 5 paragraph \(2\) state that the Applicant "must use best endeavours" rather than "reasonable endeavours", as KCC has had problems with the latter in past planning agreements and feels the former puts more onus on the developer to deliver.](#)
- [KCC does not feel that S106 Section 5, Investment in Bus and Coach Services, currently contains enough information for us to conclude the Applicant is providing “reasonable financial support”. We are not aware that the stated minimum £10m budget \(covering a nine-year Monitoring Period\) has been agreed in consultation with local authorities and coach operators who are not signatories to the S106. At this stage, KCC would like to see a high-level assessment of the costs required for the Kent services and how \(combined with other proposed services\) these can be provided within that stated budget.](#)

<p>2.20.4.2</p>	<p>Surface Access - Rail Connections</p>	<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 (Deadline 1): KCC acknowledges the significant volume of services and their theoretical capacity on the rail network to support the forecast demand from the Project, as outlined in the Transport Assessment [AS-079].</p> <p>However, 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>In view of this, together with our concern over the ambitious fifteen-fold increase in air passenger coach services for Kent to support the 55% public transport mode share target, we anticipate the Northern Runway Project will have a negative impact on current rail network capacity. A request for a second model sensitivity test on public transport mode share forecasts has been made in our Written Representation.</p> <p>Updated Position (Deadline 3): <u>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.</u></p> <p>Updated Position (Deadline 5): <u>KCC's previous concerns are maintained and as stated in our Deadline 4 Submission [REP4-055], our position remains negative on Surface Transport Impact C (Rail Network Capacity), as published in our Local Impact Report [REP1-079] and Written Representation [REP1-080]. We acknowledge that the Applicant has undertaken some forms of sensitivity testing – but not those that address KCC 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]. We therefore reiterate our request for the “second 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</u></p>	<p>A comprehensive assessment of the rail network has been undertaken in Chapter 9 of the Transport Assessment. The full set of rail data is included in ES Appendix 12.9.2 Rail Passenger Flows. The assessment for the Project shows that there is no significant adverse impact on rail services which requires mitigation.</p> <p>GAL will continue to work with Network Rail and Train Operators on potential future improvements.</p> <p><u>Updated position (April 2024): Please see above updated position on row 2.20.4.1 on sensitivity tests.</u></p>	<p>Chapter 9 of Transport Assessment [AS-079]</p> <p>ES Appendix 12.9.2 Rail Passenger Flows [APP-154]</p>	<p>Matter under discussion</p>
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		<p>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.</p>			
<p>2.20.4.3</p>	<p>Surface Access – Strategic Road Network (SRN)</p>	<p>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>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. This is not possible from the information provided in Transport Assessment Annex B – Strategic Transport Modelling Report [APP260] Tables 7 to 13. A Local Model Validation Report (LMVR) is mentioned in the Annex B text but does not appear in the Examination Library. KCC requests this being made available, so the performance of the model in the vicinity of M25 Junction 7 (M23) can be confirmed.</p> <p>Updated Position (Deadline 5): KCC’s previous concerns are maintained and as stated in our Deadline 4 Submission [REP4-055], our position remains inconclusive on Surface Transport Impact A (Access via Strategic Road Network), as published in our Local Impact Report [REP1-079] and Written Representation [REP1-080].</p> <p>We remain unable to confirm that the impacts at M25 Junction 7 (M23) would be limited – this being a critical point in the journey between Kent and Gatwick by road for both private and public transport modes. The merges & diverges of the Kent-related movements at this intersection are modelled at capacity under the Core Scenario and we would like to understand what happens if the associated ambitious public transport mode share targets are not achieved.</p> <p>We note that 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”.</p> <p>For these reasons, we reiterate our request for the “first sensitivity test” (as discussed under 2.20.4.1 above) and sight of the Local Model</p>	<p>Updated position (April 2024): A response has been provided to Kent’s Local Impact Report in The Applicant’s Response to the Local Impact Reports [REP3-078]. The operation of the M25 Junction 7 has been discussed with National Highways through stakeholder engagement sessions. National Highways has indicated that it is satisfied with the strategic highway modelling and that the impact of the Project on the operation of the junction would be limited and does not require mitigation (for example see Table 12.9.27 of ES Chapter 12: Traffic and Transport [REP3-016]).</p>	<p>The Applicant’s Response to the Local Impact Reports [REP3-078]</p> <p>ES Chapter 12: Traffic and Transport [REP3-016]</p>	<p>Under discussion</p>

		Validation Report (LMVR) so the performance of the model in the vicinity of M25 Junction 7 (M23) can be confirmed.			
Other					
<i>There are no other issues relevant to this topic in this Statement of Common Ground</i>					

2.21. Waste and Materials

2.21.1 Table 2.21 sets out the position of both parties in relation to waste and materials matters.

Table 2.21 Statement of Common Ground – Waste and Materials Matters

Reference	Matter	Stakeholder Position	Gatwick Airport Limited Position	Signposting	Status
<i>There are no issues relating to Waste and Materials within this Statement of Common Ground.</i>					

2.22. Water Environment

2.22.1 Table 2.22 sets out the position of both parties in relation to water environment matters.

Table 2.22 Statement of Common Ground – Water Environment Matters

Reference	Matter	Stakeholder Position	Gatwick Airport Limited Position	Signposting	Status
<i>There are no issues relating to Water Environment within this Statement of Common Ground.</i>					

3 Signatures

3.1.1 The above SoCG is agreed between the following:

Duly authorised for and on behalf of Gatwick Airport Limited, The Applicant	Name
	Job Title
	Date
	Signature
Duly authorised for and on behalf of Kent County Council	Name
	Job Title
	Date
	Signature

Appendix 1: Record of Engagement Undertaken

Date	Form of Correspondence	Details
13 February 2019	In-Person Meeting	TWG on DCO Application
7 March 2019	In-Person Meeting	NRP update given to Gatwick Officers Group
8 May 2019	In-Person Meeting	TWG on NRP update
5 June 2019	In-Person Meeting	NRP update given to Local Authorities Gatwick Officers Group
20 August 2019	In-Person Meeting	TWG on Land Environment
21 August 2019	In-Person Meeting	TWG on Surface Access and Transport
28 August 2019	In-Person Meeting	TWG on Air Quality, Carbon and Climate Change, and Major Accidents and Disasters
28 August 2019	In-Person Meeting	TWG on Economics and Employment
29 August 2019	In-Person Meeting	TWG Meeting on Noise
3 September 2019	In-Person Meeting	Technical Officers Group Meeting
18 September 2019	In-Person Meeting	Health Stakeholder Meeting
26 September 2019	In-Person Meeting	TWG on MAAD
27 November 2019	In-Person Meeting	TWG on Consultation Update
27 January 2020	In-Person Meeting	TWG Air Quality, Carbon and Climate Change and MAAD
30 January 2020	In-Person Meeting	TWG Economics and Employment
3 February 2020	In-Person Meeting	TWG on Land Based Topics
4 February 2020	In-Person Meeting	TWG on Surface Access
5 February 2020	In-Person Meeting	TWG on Noise
6 February 2020	In-Person Meeting	TWG on Water Environment
26 February 2020	In-Person Meeting	TWG on Consultation Update
27 July 2021	Virtual Meeting – MS Teams	TWG on Surface Access
29 July 2021	Virtual Meeting – MS Teams	TWG Landscape, Visual and Land and Water Environment
3 August 2021	Virtual Meeting – MS Teams	TWG on Economy, Employment, Housing and Health
4 August 2021	Virtual Meeting – MS Teams	TWG on Health and Wellbeing
5 August 2021	Virtual Meeting – MS Teams	TWG on Land Use and Recreation, Geology, Heritage, and Ecology
12 August 2021	Virtual Meeting – MS Teams	TWG on Air Quality, Carbon and Climate Change, and MAAD
16 March 2022	Virtual Meeting – MS Teams	TWG on Post Consultation Update
4 May 2022	Virtual Meeting – MS Teams (Recorded)	TWG on Noise
10 May 2022	Virtual Meeting – MS Teams (Recorded)	TWG on Land and Water Environment
11 May 2022	Virtual Meeting – MS Teams (Recorded)	TWG on Air Quality
12 May 2022	Virtual Meeting – MS Teams (Recorded)	TWG on Planning (Mitigation update and Design)
16 May 2022	Virtual Meeting – MS Teams (Recorded)	TWG on Econ & Soc-Econ
17 May 2022	Virtual Meeting – MS Teams (Recorded)	TWG on Transport

25 May 2022	Virtual Meeting – MS Teams (Recorded)	TWG on Planning (Forecasting & Capacity)
07 June 2022	Virtual Meeting – MS Teams (Recorded)	TWG on Noise
09 June 2022	Virtual Meeting – MS Teams (Recorded)	TWG on Land and Water Environment
14 June 2022	Virtual Meeting – MS Teams (Recorded)	TWG on Econ & Soc-Econ
15 June 2022	Virtual Meeting – MS Teams (Recorded)	TWG on Transport
20 June 2022	Virtual Meeting – MS Teams (Recorded)	TWG on Health & MAAD
21 June 2022	Virtual Meeting – MS Teams (Recorded)	TWG on Air Quality
28 June 2022	Virtual Meeting – MS Teams (Recorded)	TWG on Noise
29 June 2022	Virtual Meeting – MS Teams (Recorded)	TWG on Land & Water Environment
5 July 2022	Virtual Meeting – MS Teams (Recorded)	TWG on Planning (Mitigation Update and Design)
7 July 2022	Virtual Meeting – MS Teams (Recorded)	TWG on Econ & Soc-Econ
14 July 2022	Virtual Meeting – MS Teams (Recorded)	TWG on Air Quality
26 July 2022	Virtual Meeting – MS Teams (Recorded)	TWG on Transport
27 July 2022	Virtual Meeting – MS Teams (Recorded)	TWG on Health & MAAD
8 August 2022	Virtual Meeting – MS Teams (Recorded)	TWG on Planning B (Forecast & Capacity)
16 September 2022	Virtual Meeting – MS Teams (Recorded)	TWG on Planning B (Forecast & Capacity)
26 September 2022	Virtual Meeting – MS Teams (Recorded)	TWG on Land & Water Environment
27 September 2022	Virtual Meeting – MS Teams (Recorded)	TWG on Transport
28 September 2022	Virtual Meeting – MS Teams (Recorded)	TWG on Econ/Soc-Econ
3 October 2022	Virtual Meeting – MS Teams (Recorded)	TWG on Carbon & Climate Change
4 October 2022	Virtual Meeting – MS Teams (Recorded)	TWG on Health
14 October 2022	Virtual Meeting – MS Teams (Recorded)	TWG on Noise
19 October 2022	Virtual Meeting – MS Teams (Recorded)	TWG on Planning A (Mitigation Update & Design)
21 October 2022	Virtual Meeting – MS Teams (Recorded)	TWG on Air Quality
31 October 2022	Virtual Meeting – MS Teams (Recorded)	TWG on Land & Water
1 November 2022	Virtual Meeting – MS Teams (Recorded)	TWG on Transport
2 November 2022	Virtual Meeting – MS Teams (Recorded)	TWG on Econ/Soc-Econ
7 November 2022	Virtual Meeting – MS Teams (Recorded)	TWG on Carbon & Climate Change
8 November 2022	Virtual Meeting – MS Teams (Recorded)	TWG on Health
8 November 2022	Virtual Meeting – MS Teams (Recorded)	Biodiversity Sub-Group Meeting
10 November 2022	Virtual Meeting – MS Teams	Minerals Scoping meeting with WSCC/SCC

18 November 2022	Virtual Meeting – MS Teams (Recorded)	TWG on Econ/Soc-Econ (mop up session)
23 November 2022	Virtual Meeting – MS Teams (Recorded)	TWG on Planning A (Mitigation Update & Design)
24 November 2022	Virtual Meeting – MS Teams (Recorded)	TWG on Planning B (Forecast & Capacity)
29 November 2022	Virtual Meeting – MS Teams (Recorded)	TWG on Noise
30 November 2022	Virtual Meeting – MS Teams (Recorded)	LLFA/GAL meeting on FRA and River Mole culvert
2 December 2022	Virtual Meeting – MS Teams (Recorded)	TWG on Land & Water
5 December 2022	Virtual Meeting – MS Teams (Recorded)	TWG on Transport
6 December 2022	Virtual Meeting – MS Teams (Recorded)	TWG on Air Quality
8 December 2022	Virtual Meeting – MS Teams (Recorded)	TWG on Carbon & Climate Change
12 December 2022	Virtual Meeting – MS Teams (Recorded)	TWG on Major Accidents & Disasters
14 December 2022	Virtual Meeting – MS Teams (Recorded)	TWG on Noise (Noise Envelope)
14 December 2022	Virtual Meeting – MS Teams (Recorded)	Biodiversity Sub-Group Meeting
14 December 2022	Virtual Meeting – MS Teams (Recorded)	TWG on Econ/Soc-Econ
4 January 2023	Virtual Meeting – MS Teams (Recorded)	TWG on Noise
10 January 2023	Virtual Meeting – MS Teams (Recorded)	TWG on Land & Water
16 January 2023	Virtual Meeting – MS Teams (Recorded)	TWG on Air Quality
17 January 2023	Virtual Meeting – MS Teams (Recorded)	TWG on Planning (Mitigation Update and Design)
18 January 2023	Virtual Meeting – MS Teams (Recorded)	TWG on Carbon
19 January 2023	Virtual Meeting – MS Teams (Recorded)	TWG on Health and MAAD
31 January 2023	Virtual Meeting – MS Teams (Recorded)	TWG on Transport
8 February 2023	Virtual Meeting – MS Teams (Recorded)	TWG on Noise
9 February 2023	Virtual Meeting – MS Teams (Recorded)	TWG on Land & Water
7 March 2023	Virtual Meeting – MS Teams (Recorded)	TWG on Planning B (Forecast and Capacity)
13 March 2023	Virtual Meeting – MS Teams (Recorded)	TWG on Air-Quality
14 March 2023	Virtual Meeting – MS Teams (Recorded)	TWG on Planning B (Forecast and Capacity)
10 November 2023	Virtual Meeting – MS Teams (Recorded)	TWG on Transport (Highways)
11 December 2023	Virtual Meeting – MS Teams (Recorded)	TWG on Greenhouse Gases
12 December 2023	Virtual Meeting – MS Teams (Recorded)	TWG on Employment Skills & Business Strategy
13 December 2023	Virtual Meeting – MS Teams (Recorded)	TWG on Air Quality
15 December 2023	Virtual Meeting – MS Teams (Recorded)	TWG on Transport (Post-COVID Modelling)
20 December 2023	Virtual Meeting – MS Teams (Recorded)	TWG on Noise

9 February 2024	Virtual Meeting – MS Teams (Recorded)	TWG on Ops and Capacity
15 February 2024	Virtual Meeting – MS Teams (Recorded)	TWG on Catalytic Impacts Assessment
15 February 2024	Virtual Meeting – MS Teams (Recorded)	TWG on Needs and Forecasting