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Your Reference:
TR020005

KCC Interested Party
Reference Number:
20044780

Date: 26th June 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 6

As outlined within the Examination Timetable (Annex A of the Rule 8 letter (PD-011)), this letter is Kent County Council's (KCC) Deadline 6 submission which provides the following:

- Post-hearing submissions, including written summaries of oral submissions to the Hearings held during w/c 17th June 2024
- Comments on any further information/submissions received by Deadline 5

Post-hearing submissions, including written summaries of oral submissions to the Hearings held during w/c 17th June 2024

KCC attended Issue Specific Hearing 8 on the 18th and 19th June 2024 and made an oral representation under Agenda Item 3 – Surface Access Commitments. Our oral submission made clear that whilst we are supportive of improved public transport between Kent and the airport, we continue to remain concerned about how achievable the targets set by the Applicant are. Past experience has proven that coach services between Kent and Gatwick have often struggled with long term viability, even with financial support.

Previously we had requested for two sensitivity tests to be undertaken by the Applicant. Unfortunately these have still not been provided, so again we repeated our ask for model sensitivity tests to be undertaken, providing adverse case scenarios for both road and rail travel, and for these to be submitted as part of the Examination. It is imperative that all interested parties understand the implications should the Applicant fail to meet the committed mode share targets.

Furthermore, it must be clearly understood that KCC does not support any growth at the airport and our overall position on the Northern Runway Project is one of opposition. However, should the Examining Authority be minded to recommend to the Secretary of State



that consent is granted, we would support the Environmentally Managed Growth proposals put forward by the other local authorities. Robust controls must be implemented to ensure that mode share targets are met as part of this development.

Comments on any further information/submissions received by Deadline 5

Deadline 5 Submission – 10.38 The Applicant's Response to Deadline 4 Submissions Version 1 [REP5-072]

Table 2: Response to ExQ1 – Climate Change and Greenhouse Gases from Kent County Council

KCC's concerns regarding climate change and greenhouse gases remain unchanged following the Applicant's response to KCC's Deadline 4 submission [REP4-055].

The Department for Environment, Food and Rural Affairs (DEFRA) published an updated version of their policy paper *Explanatory* memorandum to the environmental principles policy statement on 31st January 2023. This policy paper sets out how principles should be interpreted and proportionately applied by Ministers of the Crown so that they are used effectively to shape policy to protect and enhance the environment. The Environment Act 2021 places a legal duty on Ministers of the Crown to have "due regard" to the policy statement when making policy. In practice, this means that policymakers will need to consider five internationally recognised environmental principles when developing policy, one of which is the precautionary principle.

Section 7.2 of the Explanatory Memorandum describes the precautionary principle as follows – *'where there are threats of serious or irreversible environmental damage, a lack of full scientific certainty shall not be used as a reason for postponing cost-effective measures to prevent environmental degradation'*

Furthermore, we would highlight the following principles in the policy statement which should be considered when examining this application:

- the rectification at source principle – environmental damage should, as a priority, be addressed at its origin to avoid the need to remedy its effects later
- the polluter pays principle – where possible, the costs of pollution should be borne by those causing it, rather than the person who suffers the effect of the resulting environmental damage, or the wider community

It is unclear how the application by Gatwick Airport Limited demonstrates compliance with these principles.

Table 23: Response to ExQ1 – Traffic and Transport from Kent County Council

The Applicant states on page 217 that "Sensitivity tests for different mode share scenarios are not required as these are not proposed by the Project, i.e. the Applicant is committed to funding for bus and coach services and as such there would not be a flat public transport mode share at pre-pandemic levels." KCC understands that this commitment runs to five years' support for each proposed coach service and a monitoring / reporting / action plan regime of nine years. We do not feel this guarantees meeting the ambitious 55% mode



share targets for year 2047. Our recent experience with failed airport coach services between Kent/Stansted and Kent/Gatwick is that they require continual subsidy.

Furthermore, the Applicant states on page 303 that "Table 178 of Transport Assessment Annex B [APP-260] shows the number of air passengers using coach services for surface access. The number of committed daily coach services for Kent increases from 36 per direction in the future baseline to 131 per direction with Project (not fifteen-fold)." KCC appreciates clarification on the increase in committed daily coach services and notes the effect of this in relation to the kerb space available has not been assessed. We note further that the number of Kent air passengers riding these coaches shown in Table 178 increases from 60 in the Base Year to 925 in 2047 with Project, which is the 15-fold increase we remain concerned about.

Yours sincerely,

Simon Jones

Corporate Director – Growth, Environment and Transport