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Your Reference:
TR020005

KCC Interested Party
Reference Number:
20044780

Date: 15th July 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 7

As outlined within the Examination Timetable (Annex A of the Rule 8 letter [PD-011]), this letter is Kent County Council's (KCC) Deadline 7 (D7) submission which provides the following:

- Responses to the Examining Authority's Second Written Questions (ExQ2)
- Comments on any further information/submissions received by Deadline 6 (D6)

Responses to ExQ2

KCC's response to Question CC.2.1 "Finch v Surrey County Council" of the Examining Authority's second written questions and requests for information (ExQ2) [PD-021]:

As a result of the Supreme Court's recent Finch v Surrey County Council judgement, it is possible that downstream Greenhouse Gas (GHG) impacts of the application could come under scrutiny. The application includes GHGs only as far as the landing stage of an outward flight but does not consider consequential additional GHGs incurred by destination airports resulting directly from Gatwick expansion. Additional GHGs could also be generated at any destination which expands its airport capacity to accommodate increased flight traffic arising from Gatwick expansion. Whilst it is correct that GHG emissions are accounted for in relevant destination countries, it is the increment to global as well as local GHGs that could be subject to challenge – at either level. It should also be recognised that aviation emissions occur at any point in an aircraft's journey.

[Brian Larkin](#)¹ states that airports are tricky infrastructure as they are 'things and also the relationship between things'. Under this viewpoint, the downstream social value impacts on

¹ The Politics and Poetics of Infrastructure. Annual Review of Anthropology, Volume 42, 2013.

human and natural capital caused by the Project's additional GHGs could potentially come under challenge.

KCC seeks clarity on whether the downstream GHG impacts of the Gatwick Northern Runway Project have been assessed.

Comments on any further information/submissions received by Deadline 6

Deadline 6 Submission – 10.49.4 The Applicant's Response to Actions ISH8: Noise [REP6-081] & Deadline 6 Submission – 5.3 Environmental Statement Appendix 14.9.7 The Noise Envelope Version 3 (Tracked) [REP6-056]

Following review of the Applicant's revised noise envelope, it is clear the only changes that have been made are a reduction to the areas of the day and night noise contour area limits. However, the Applicant's recent submissions (REP6-081 and REP6-056) do not appear to provide a clear rationale for this change.

Furthermore, it is difficult to determine the extent of the impact on the ground of these changes as the Applicant has not provided a map demonstrating the revised contours, nor has the Applicant's Aircraft Noise Viewer been updated. Paragraph 2.1.4 of REP6-081 states "*As a consequence of the reduction in the noise envelope contours amendments will also be required to reduce the extent of the noise insulation inner and outer zones, to correlate with the Noise Envelope Period 1 noise envelope contours.*" It is clear that this change will result in communities that were previously entitled to claim under the Noise Insulation Scheme now not being eligible. It is only right that Interested Parties and affected communities are able to determine the impact of these changes and the clear rationale behind them.

Deadline 6 Submission – 5.3 Environmental Statement Appendix 5.4.1 Surface Access Commitments Version 3 [REP6-030]

KCC acknowledges the addition of information on the "Bus and Coach Services Fund" to the Surface Access Commitments. This commitment was previously only made in the Section 106 agreement to which KCC and coach operators are not signatory.

Deadline 6 Submission – 10.52.4 The Applicant's Response to Deadline 5 Submissions – Response to GHG Comments [REP6-094]

KCC notes the Applicant's view on the viability & deliverability of the Jet Zero Strategy in Section 6 of The Applicant's Response to Deadline 5 Submissions - Response to GHG Comments. Our position on all related impacts previously raised remains unchanged at negative.

Yours sincerely,

Simon Jones

Corporate Director – Growth, Environment and Transport