



Kevin Gleeson
Lead Member of the Examining Authority
National Infrastructure Planning
The Planning Inspectorate
Temple Quay House
Temple Quay
Bristol
BS1 6PN

Growth, Environment & Transport

Sessions House
Maidstone
Kent
ME14 1XQ

Your Reference:
TR020005

KCC Interested Party
Reference Number:
20044780

Date: 7th August 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 8

As outlined within the Examination Timetable (Annex A of the Rule 8 letter [PD-011]), this letter is Kent County Council's (KCC) Deadline 8 (D8) submission which provides the following:

- Comments on the Applicant's responses to the Examining Authority's Second Written Questions (ExQ2)
- Comments on any further information/submissions received by Deadline 7 (D7)

Comments on the Applicant's responses to ExQ2

Deadline 7 Submission – 10.56.15 The Applicant's Response to ExQ2 - Traffic and Transport [REP7-092]

Sensitivity Test on Lower Public Transport Mode Share

KCC understands that there is an existing pre-application sensitivity test on Lower Public Transport Mode Share, which has been discussed with the Joint Surrey Councils and which sounds similar to KCC's first sensitivity test request. The test is mentioned in the first bullet point of Question TT.2.10 as follows:

"A test which explored the implications of only limited additional interventions beyond those expected in the future baseline scenario, leading to a public transport mode share which would be lower than that to which the Applicant is committing in ES Appendix 5.4.1: Surface Access Commitments (SAC) [REP6-030]."

KCC's first sensitivity test request was as follows:

"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."

KCC would have appreciated sight of this sensitivity test on Lower Public Transport Mode Share, in particular to understand the increase in private car traffic on the M25 east of the M25/M23 junction caused by the ambitious number of Kent coach passengers within the core scenario forecast being reassigned to car. However, we understand that the '10% sensitivity test' described below can act as a proxy.

Sensitivity Test on Increasing Airport-related Highway Journeys

KCC notes the information provided in Appendix A of the submission, on the sensitivity test which increased airport-related highway journeys in the modelled Core Scenario by 10%. We also note the Applicant's position stated in paragraphs 1.1.4 and 5.1.3 that: *"the mode share commitments are based on annual performance, and therefore a higher volume of Airport-related traffic on a busy June day does not necessarily mean that the mode share commitments have not been achieved; however, this '10% sensitivity test' is considered to serve as a proxy analysis for what the impact may be in circumstances where they were not met."*

Although the '10% sensitivity test' does not exactly address KCC's concerns about the switch to car of the ambitiously forecast core scenario Kent coach passengers, it nevertheless provides an insight into the likely outcomes of our requested first sensitivity test stated earlier.

The analysis presented in Appendix A Figures 7 to 10 on magnitude of impact indicates that the '10% sensitivity test' provides a greater level of impact than the modelled Core Scenario to the road network in the area around the M25/M23 junction in both 2032 and 2047.

Deadline 3 Submission - 7.4 Transport Assessment - Annex E Highway Junction Review - Version 2 [REP3-060] indicates several "nodes" of the M25/M23 junction are taken over capacity in the 2032 and 2047 With Project Core Scenarios compared to the future baseline. All these nodes are part of the M25/M23 merges & diverges that highway traffic must negotiate when travelling between Gatwick and Kent. A situation of higher road traffic than the Core Scenario, such as the '10%' or the 'Lower Public Transport Mode Share' sensitivity tests, would therefore take these merges & diverges further over capacity.

KCC maintains the "inconclusive" rating for our Local Impact Report [REP1-079] Surface Transport Impact A - Access via Strategic Road Network.



Comments on any further information/submissions received by Deadline 7

Deadline 7 Submission – 5.3 Environmental Statement Appendix 5.4.1 Surface Access Commitments Version 4 [REP7-042]

KCC acknowledges the addition of information on the “Rail Enhancement Fund” to the Surface Access Commitments and notes the following text in Commitment 14A Point (3):

“(3) GAL must make the Rail Enhancement Fund available to fund further interventions proposed by Network Rail and/or rail operators which address an evidenced impact on the railway network that is directly related to the Project . . .”

Given the relationship between access to Gatwick by rail and the passenger mode share commitments, KCC requests that “evidenced impact on the railway network” is replaced by “evidenced impact on the transport network”. This would not only enable monitoring and mitigation of impacts to all modes, but also to rail services that have yet to be implemented, such as the Tonbridge to Redhill Line, that would mitigate congestion at the London transfer stations that all Kent-Gatwick rail travellers must currently negotiate.

Yours sincerely,

Simon Jones

Corporate Director – Growth, Environment and Transport