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**Growth, Environment & Transport**

Sessions House  
Maidstone  
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ME14 1XQ

Your Reference:  
TR020005

KCC Interested Party  
Reference Number:  
20044780

Date: 21st 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 Final Principal Areas of Disagreement Summary Statement (PADSS)**

In line with the Development Consent Order process, as outlined within the ‘*Rule 8 letter - Notification of timetable for the Examination letter*’ [PD-011], please find enclosed the final iteration of Kent County Council’s (KCC) Principal Areas of Disagreement Summary Statement (PADSS) Tracker.

This document has been updated to reflect the latest Statement of Common Ground between KCC and the Applicant, along with the key issues presented within KCC’s Local Impact Report [REP1-079] and Written Representation [REP1-080].

Our current principal areas of disagreement relate to:

- Noise
- Climate change and carbon emissions
- Surface access (Coach and Rail connections)
- Heritage conservation
- Socio-economic impacts

Yours sincerely,

**Simon Jones**

Corporate Director – Growth, Environment and Transport

**Principal Areas of Disagreement Summary Statement – Kent County Council  
(Version 4 - 21/08/2024)**



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1	Noise - Aircraft Noise over Kent – impact on communities, National Landscapes (previously Areas of Outstanding Natural Beauty) and heritage sites	2.16.3.1  LIR - Noise Impact H,I,J	<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 National Landscape designated 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.</p> <p>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>KCC note that Hever Castle is anticipated to experience a 20% increase in daily overflights. The current level of overflight and resulting noise impact on West Kent is unacceptable and measures should be taken by Gatwick Airport Ltd to reduce the number of aircraft flying over this area.</p> <p>KCC’s Local Impact Report [REP1-079] highlighted the recent change to legislation regarding National Landscapes. Where possible the project should “seek to further the purposes of the National Landscape”.</p>	<p>KCC understand that noise levels, even with technological advances, will continue to have adverse impacts on West Kent residents, the AONB (National Landscape) and heritage attractions.</p> <p>It is unlikely that any changes to the application, unless they reduce the noise levels in Kent to below that measured in 2019, will make the proposals acceptable to KCC. As such, KCC oppose the Northern Runway Expansion.</p> <p>Clarification was requested from the Applicant as to whether the Northern Runway Project (NRP) would result in an increase in arrivals on the main runway. The Applicant confirmed this would be the case, however, Appendix F - Aircraft Fleets for Noise Modelling of Supporting Noise and Vibration Technical Notes to Statements of Common Ground (Doc Ref 10.13) [REP3-071] does not state a clear breakdown of the number of arrivals and departures, therefore meaning it is not possible to easily determine the true intensification of the main runway. Furthermore, sufficient detail has not been provided for KCC to feel satisfied that a thorough assessment of the impacts has been undertaken.</p> <p>The Applicant’s reluctance to provide an overflight map demonstrating flights solely from Gatwick Airport is</p>

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				again disappointing. This prohibits Interested Parties from understanding the true extent of the increase in overflights from Gatwick Airport, and the impact these will have on communities on the ground. This omission is completely unsatisfactory and it is imperative the detail is communicated to the Examining Authority and Interested Parties when examining the application for an Development Consent Order.
2	Noise – overflight	2.16.3.2  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).</p> <p>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.</p> <p>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 detail is needed for local authorities to understand the true extent of overflight impacts on communities on the ground.</p> <p>The current documentation provides no clarity on how the Northern Runway Project will impact arriving aircraft at Gatwick. 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>Furthermore, the Applicant has not made it possible to draw a direct comparison between the 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. An</p>

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				<p>overflight map for 2032 showing just the flights from Gatwick with the NRP is needed.</p> <p>It is disappointing that despite these requests being made at various points throughout the Examination, the Applicant has been reluctant to address these concerns.</p>
3	Noise – go around	2.16.3.3  LIR - Noise Impact B	KCC appreciates it is difficult to predict the need for aircraft to go-around when arriving at Gatwick. However, it should be noted that any increase in the number of air traffic movements at the airport will inevitably result in an increased chance of go-arounds.	<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.</p> <p>KCC would further encourage the Applicant to work with airlines to reduce the need for go-arounds as much as feasibly possible.</p>
4	Noise – night noise	2.16.3.4  LIR – Noise Impact C	It is clear that, in Kent, the Applicant anticipates there will be minor differences in levels of night noise. However, The Applicant has used annual noise contours to determine if extra capacity would affect noise levels during periods outside of the 92-day summer period. It is hard to draw any meaningful conclusion from the analysis of annual contours.	The Applicant has clarified that any seasonality in the way the extra capacity delivered by the Project is used has little effect on noise levels across seasons. This is noted by KCC.

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5	Noise – Overflight – Health and Wellbeing (awakenings)		KCC has previously raised concerns about the health impacts of aircraft overflight. Areas of West Kent are regularly overflowed by arrivals to Gatwick, with aircraft turning and joining the Instrument Landing System (ILS) over Tunbridge Wells. We are aware there have been several studies that show a noise disturbance caused by overflight, especially during the night period, can result in an impact on both mental health and physical health in terms of cardiovascular diseases.	<p>KCC remains concerned about the health impacts of increased night time overflight disturbance in areas such as Edenbridge and Penshurst should the slower transition case materialise.</p> <p>KCC acknowledge that the overflight over West Kent is unlikely to be able to be reduced; however, GAL should further ensure that this area is effectively monitored, and mitigation be put in place should a slower transition case occur.</p>
6	Noise – Tunbridge Wells	2.16.3.5 LIR - Noise Impact D	It has not been possible to determine the impact of the proposals on Tunbridge Wells district due to the Applicant's application failing to provide any information about aircraft noise in this area.	<p>Throughout the Examination KCC requested 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 has been provided to enable KCC to meaningfully assess the level of impact. Furthermore, the overflight mapping provided by the Applicant (Figure 14.9.31 of APP-065) 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.</p> <p>During westerly operations Tunbridge Wells is more so affected by arrivals and no information has been provided in GAL's application as the associated noise impacts with the Northern Runway in routine operation.</p>

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7	Noise - Sevenoaks	2.16.3.6  LIR – Noise Impact E	KCC’s Local Impact Report [REP1-079] concludes that noise impacts associated with the NRP will have a neutral impact on Sevenoaks district, however, no information has been provided in the application as to the associated noise impacts with arrivals when the Northern Runway is in routine operation.	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.
8	Noise – Community representative locations	2.16.3.7  LIR - Noise Impact F	Seven community representative locations were selected to: “...describe the air noise changes expected from the Project in more detail” (paragraph 14.9.150 [APP-039]). There is only one community representative location in Sevenoaks (Chiddingstone Church of England).  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 throughout the Examination.	Throughout the Examination KCC requested for the Applicant to undertake further assessment of additional community representative locations.  Locations should be identified in other areas of Sevenoaks, such as Penshurst and Edenbridge, where adverse noise impacts are already experienced by existing Gatwick operations, and locations identified within Tunbridge Wells which has so far not yet been subject to any thorough noise assessment.  It is disappointing the Applicant was not willing to undertake any further assessments.
9	Noise – Noise Envelope	2.16.3.8  LIR - Noise Impact G	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 remains disappointed by the progress made to the Noise Envelope throughout the Examination. We would request that the Applicant undertakes further work, in consultation with local authorities, to ensure the noise envelope is robust.

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10	Climate Change - Emissions	2.11.3.1 and 2.11.3.2	<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>When calculating the extra cost of Greenhouse gases to society due to the project the annual cost ranges from £185 million to £343 million. From 2029 to 2050, the cumulative impact cost of the extra carbon emissions released from this project totals £5.93 billion. The effects on society and costs do not appear to have been accounted for in GAL’s plans.</p> <p>It is currently unclear how the proposals are complying with the Climate Change Committee’s recommendations. On this basis, KCC is concerned about negative impact in terms of greenhouse gases and climate change.</p>	<p>KCC requested that a carbon reduction trajectory be set for the Project, a process by which progress can be independently monitored and remedial action taken if reduction targets are not being met.</p> <p>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.</p> <p>KCC also requested further evidence showing how the proposals comply with the Climate Change Committee’s recommendations.</p>
11	Climate Change – Aviation Emissions	2.11.3.3	<p>KCC is concerned about the proposed aviation emissions associated with this proposal. Data shows that between 2029 and 2050 an extra 18,523 ktonnes (kt) of CO2e is projected to be produced from aviation emissions due to routine use of the Northern Runway, or 18,693kt of CO2e in the event of a slow fleet transition.</p> <p>The extra aviation emissions from this project to 2050 would require 98,005 hectares of woodland to fully offset the extra emissions.</p>	<p>KCC sought 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.</p> <p>Furthermore, it would have been helpful to understand if the impact of the Northern Runway proposals on the Sixth Carbon Budget has been calculated.</p>

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12	Surface Access - Public Transport	2.20.4.1	<p>KCC has two outstanding concerns related to the ambitious forecast of Kent air passengers using coach services to travel between Kent and Gatwick.</p> <p>KCC understands that the 55% public transport mode share targets assume a nearly three-fold increase in total air passengers using coach services between the 2016 baseline and 2047 with Project. This is supported by a fifteen-fold increase in air passengers using coach services for Kent.</p> <p>If this ambitious patronage is not realised there is an associated negative risk that private traffic levels between Kent and Gatwick are higher than forecast, taking the merges &amp; diverges of the M25 Junction 7 (M23) intersection over capacity.</p> <p>If this ambitious patronage is realised it is not clear that sufficient kerb space would be available to accommodate the significant increases in forecast coach arrivals &amp; departures. The Applicant has confirmed that detailed assessment of the forecourt performance using the VISSIM models has not been undertaken as part of the DCO assessment.</p> <p>Finally, KCC has concerns around what constitutes “reasonable financial support” for the committed coach services. KCC’s experience is that coach services between Kent and Gatwick do not work without subsidy.</p>	<p>KCC has requested a sensitivity test on the public transport mode share forecasts and acknowledges an existing / similar test on increasing airport - related highway journeys by 10%, provided in Appendix A of The Applicant's Response to ExQ2 - Traffic and Transport [REP7-092]. This test indicates a greater level of impact than the Core Scenario to the road network in the area around the M25/M23 merges &amp; diverges that highway traffic must negotiate when travelling between Gatwick and Kent. However, not enough detail was provided.</p> <p>KCC has requested 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.</p> <p>KCC has asked the Applicant to provide further information on what it deems “reasonable financial support”, including a high-level assessment of the costs required for the Kent services and how (combined with other proposed services) these can be provided within the minimum £10m budget.</p>



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13	Surface Access - Rail Connections	2.20.4.2	<p>Improving transport connections to Gatwick from Kent has not been sufficiently addressed, particularly to bring forward initiatives to serve passengers &amp; 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 &amp; Reading.</p> <p>This would help alleviate KCC 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). This would also help widen the economic benefits of the airport to Kent.</p>	<p>KCC understands that the possibility of direct rail services has been discussed but has not been brought forward as part of the assessment. KCC is disappointed with this approach.</p> <p>We accept that unfunded rail enhancements cannot be included in future planning for improved sustainable access to Gatwick Airport. However, GAL could certainly lobby for improvements and help support the case. KCC encourages GAL to continue to work with partners such as Network Rail and Train Operators on this matter.</p> <p>KCC has requested a second model sensitivity test on public transport mode share forecasts. This test would maintain the public transport mode share for air passenger coaches at the same levels as those prior to the pandemic but cover the achievement of 55% public transport mode share by increases in rail patronage. This test would represent an “adverse case” for travel between Kent and Gatwick by rail – in terms of increasing patronage and associated pressure on the capacity of the London rail connections that Kent passengers have to travel through.</p>
14	Surface Access – Strategic Road Network (SRN)	2.20.4.3	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 [REP3-058].	KCC has requested sight of the Local Model Validation Report (LMVR) 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.

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			<p>The merges &amp; diverges of this intersection are forecast to operate at capacity in the model Core Scenario, so we would assume they would operate over capacity in traffic levels higher than this best practice planning scenario.</p> <p>Such an instance might occur if the ambitious public transport mode share targets were not met; and more Kent air passengers accessed the airport by car.</p> <p>This would provide a negative impact at a critical point in the journey between Kent and Gatwick by road for both private and public transport modes.</p>	<p>KCC has requested a sensitivity test on the public transport mode share forecasts and acknowledges an existing / similar test on increasing airport - related highway journeys by 10%, provided in Appendix A of The Applicant's Response to ExQ2 - Traffic and Transport [REP7-092]. This test indicates a greater level of impact than the Core Scenario to the road network in the area around the M25/M23 merges &amp; diverges that highway traffic must negotiate when travelling between Gatwick and Kent. However, not enough detail was provided.</p>
15	Heritage conservation – Impact on historic buildings, archaeology and landscapes		<p>The Applicant's Environmental Statement – Chapter 7 Historic Environment [APP-032], Baseline Report [APP-101] and Historic Environment Figures [APP-054] do not cover West Kent.</p> <p>There is no assessment of increased noise, visual or pollution impact on Historic Buildings despite clear increases being demonstrated in Environmental Statement – Chapter 14 Noise and Vibration [APP-039].</p> <p>It is essential that there is a reasonable assessment of the historic environment of West Kent so that a review of the impact from this scheme on the heritage assets' significance, including their settings, can be undertaken.</p>	<p>KCC requested for a Historic Environment Assessment of West Kent heritage to be undertaken with a suitable impact assessment (the study area should be agreed with KCC's Heritage team). This assessment should have included, but not be limited to, an assessment of increased noise, visual or pollution impact on Historic Buildings. Historic buildings that need to be assessed and considered are Hever Castle, Penshurst Place and Chiddingstone Castle, along with those located within the Conservation Areas of Markbeech, Chiddingstone, Hoath Corner and Royal Tunbridge Wells historic spa town. Until a Historic Environment Assessment of West Kent heritage is provided KCC will continue to object to the proposals as we are unable to assess the full impact on historic buildings in West Kent.</p>

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16	Needs Case	WR 5.1  SOCG 2.9.1.1	<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>Alternative top-down forecasts have been presented by GAL [REP1-052] that show slower growth in the early years following the opening of the NRP. These are considered more reasonable than the original bottom-up forecasts adopted by the Applicant but still fail to take adequate account of the extent to which some part of the demand could be met by expansion at other airports serving London, including a third runway or other expansion being delivered at Heathrow.</p> <p>There remains concern that it is unreasonable to assume that the existing single runway operation will be able to support 67.2mppa meaning that the assessment of impacts understates the effects, see REP4-049.</p>	<p>Despite the Applicant submitting further documentation into the Examination, KCC remains unconvinced of the needs case for these proposals. The forecast future demand figures do not take account of actual levels of demand and the market share of other airports in the South East with overlapping catchment areas. A consequence of over optimistic demand growth assumptions is that the Applicant has set the noise envelope too high so that there is no incentive to reduce noise as Gatwick will be operating comfortably within its noise envelope.</p> <p>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 (as detailed in KCC's Local Impact Report).</p>

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17	Socio-economic		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>KCC welcomes the work presented in the Employment Skills and Business Strategy [APP-1987]. In addition, the Draft ESBS Implementation Plan [REP3-069] provides further information on how the Applicant proposes to deliver the ambitions of the strategy.</p> <p>KCC welcomes the opportunity to be involved in the delivery of the strategy. However, without appropriate mitigation of the adverse impacts of the airport, such as aircraft noise, it is likely to remain the case that Kent is unfairly disadvantaged by the proposals.</p>
18	Construction		KCC welcomes the development of a package of construction training, upskilling, and apprenticeship opportunities presented. However, KCC feels the proposals are not yet sufficient for temporary construction workers from Kent.	KCC recommended further consideration be given to the areas where temporary construction workers will be travelling from. Sustainable travel plans have been produced by the Applicant are required to be implemented to ensure workers can get to the site but these currently provide very little focus on sustainable travel from Kent.