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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 Closing Statement**

As per the Examining Authority’s request at Issue Specific Hearing 8 [EV17-017], this letter is Kent County Council’s (KCC) Examination Closing Statement.

In respect to this application, KCC continues to strongly oppose the proposals to bring the existing Northern Runway at Gatwick Airport into routine use. KCC has engaged in the early development of the proposals as part of the Gatwick Joint Local Authorities and throughout the six month formal Development Consent Order (DCO) Examination.

KCC’s Relevant Representation [RR-2422] outlined the five key areas where we have concerns, with specific interest to Kent. However, KCC has also supported other points raised by the Joint Local Authorities, especially regarding Traffic and Transportation. These concerns were discussed, many at length, throughout the Examination. However, it was disappointing that the Applicant was unwilling to undertake any further work to enable Interested Parties to understand the impact of the proposals on Kent in particular.

The five key areas of concern raised within KCC’s Relevant Representation and that still remain are as follows:

**1. Needs case**

KCC continues to question whether the needs case for this scheme has been evaluated effectively. Work undertaken by York Aviation on behalf of the Joint Local Authorities concluded that the increase in capacity unattainable, and levels of usage of the Northern Runway proposals, are overstated. As a result of this, the wider economic benefits have also been overstated.

## **2. Carbon emissions**

KCC believes the Northern Runway project would have a significant material impact on the Government's ability to meet carbon reduction targets and therefore should weigh against granting development consent. By 2050, routinely operating the Northern Runway would see Gatwick being responsible for 20% of the overall UK aviation carbon budget. Furthermore, KCC is concerned that this expansion cannot be justified in the wider context of the global requirement to reduce CO2 emissions.

## **3. Noise from overflying aircraft**

KCC has long argued the impacts of Gatwick's current single runway configuration are already unacceptable, and a potential increase of these impacts on local communities would be intolerable. Areas of West Kent such as Tunbridge Wells, Edenbridge, Hever and Penshurst are adversely affected by overflight from Gatwick. Tranquillity within National Landscapes will be further negatively impacted, including at several heritage sites, e.g. 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. We advocate that this is not in keeping with the ethos of sustainable growth that is promoted in Gatwick's Master Plan.

## **4. Intensification of the main runway at Gatwick**

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.

## **5. Lack of efficient rail connections to Kent**

A direct rail service from Kent to Gatwick continues to be a priority within KCC's Kent Rail Strategy 2021. Such a service could be delivered with only modest further infrastructure enhancements and could be a natural extension of the existing GWR operated Reading – Gatwick services by extending this to Canterbury West via Redhill, Tonbridge and Ashford.

We accept that unfunded rail enhancements cannot be included in future planning for improved sustainable access to Gatwick Airport. However, Gatwick Airport Limited (GAL) could assist by lobbying for improvements and to help support the case. KCC encourage GAL to continue to work with partners such as Network Rail, Train Operating Companies and the Department for Transport (DfT) on this matter.



Furthermore, KCC's Policy on Gatwick Airport, adopted by KCC Cabinet in December 2014, explicitly states that KCC opposes a second runway at Gatwick. Whilst at the time, this was in the context of the Airports Commission and the proposals for a newly constructed and independently operated second runway, we consider these latest proposals to routinely use the Northern Runway as a way for Gatwick to become a two-runway airport by another means.

We hope KCC's participation in the Examination has been helpful but should you require any further information or clarification, please do not hesitate to contact me.

Yours sincerely

**Simon Jones**

Corporate Director – Growth, Environment and Transport