



By email:  
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Sessions House  
County Hall  
Maidstone  
ME14 1XQ

27<sup>th</sup> July 2022

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Dear Sir/Madam,

**Gatwick Airport Northern Runway Highway Improvement Changes and Project Update Consultation 2022**

**Response from Kent County Council**

This is Kent County Council's (KCC) response to the consultation by Gatwick Airport Limited (GAL) on the highway improvement changes and latest project updates for the Northern Runway Project (NRP).

Our responses to the 2018 draft Masterplan consultation and autumn 2021 statutory consultation contained our concerns about the NRP in detail. The four key areas we highlighted in 2021 were (1) intensification of the main runway, (2) noise from overflying aircraft, (3) carbon emissions, and (4) lack of connections to Kent. This 2022 consultation does not directly address any of those matters and whilst we have not sought to repeat our 2021 consultation response, we ask that GAL takes those concerns seriously and works to address them.

We would reiterate that the NRP is not compatible with our Policy on Gatwick Airport and KCC continues to oppose a second runway at Gatwick (whether it is newly constructed or the repurposing of the existing emergency runway).

Please find attached our response to the 2022 consultation.

Yours sincerely

**Simon Jones**

Corporate Director for Growth, Environment & Transport  
Kent County Council



## **Kent County Council's Response to Gatwick Airport's Northern Runway Highway Improvement Changes and Project Update Consultation 2022**

### **Road improvements – design and mitigation**

Q1. What are your views on our updated road improvement proposals?

For details regarding the proposed local road improvements, KCC defers to the view of those Local Authorities directly affected.

However, we would emphasise the importance of providing sustainable access to the airport for staff and customers alike. Therefore, road improvements should be designed to provide the required capacity but sustainable access options need to be promoted to reduce the demand on the highway network.

### **Car parking**

Q2. What are your views on our car parking proposals, including for additional on-airport spaces to assist with reducing existing off-airport unauthorised spaces?

For details regarding the proposed approach to car parking, KCC defers to the view of those Local Authorities directly affected.

### **Project updates**

Q3. What are your views on our Project updates? Please specify the topics to which your comments refer.

### **Airport Surface Access Strategy (ASAS) and Travel Plans**

We note that an updated ASAS will be submitted with the Development Consent Order (DCO) application and welcome the proposed involvement of local authorities and other relevant stakeholders in its development, as per paragraph 3.3.10. The approach proposed appears logical but should avoid only outputting targets that are easily achievable, as may be the case when modelling the impact of the proposed measures is used to set the targets. An alternative approach would be 'backcasting,' where a desirable future scenario is agreed and then measures are formulated to reach that target. This is similar to the approach of Transport for the South East in their Transport Strategy where 'decide and provide' was advocated.

If the proposed approach is used then we ask for stretch targets to also be included, noting that other opportunities to increase the sustainable transport mode share may become available over the life of the ASAS. It would be disappointing and ineffectual to have a new ASAS that only sets targets the planned improvements are almost guaranteed to achieve as a target should be something to strive for beyond the business as usual scenario. There should also be review points and penalties if the targeted mode share is not achieved.



We would expect the ASAS to include measures on taxis and minicabs serving the airport given the number of firms specialising in airport shuttles, particularly in West Kent. This could include promoting electric vehicles.

### **Bus and Coach Strategy**

We support the studies into regional coach services to locations in Kent and Medway and would be keen to receive more details of these proposals when available. Previous airport coach services have failed to be retained in Kent and market research should be undertaken into how to embed these services so that they can be a long-term viable solution.

### **Rail Strategy**

We accept that unfunded rail enhancements cannot be included in future planning for improved sustainable access to Gatwick Airport. However, Gatwick could certainly lobby for improvements and help support the case for a Canterbury West to Gatwick Airport via Ashford International, Tonbridge and Redhill rail service by providing airport passenger data showing journeys from locations on that line of route. We would encourage GAL to work with partners such as Network Rail and Train Operators on this matter.

### **Carbon**

The project update states that to a large extent emissions from aircraft are outside Gatwick's control. Whilst this is true, it is within Gatwick's control to implement bans on the most polluting aircraft as has been done for the noisiest aircraft.

Jet Zero is a framework to net zero for the aviation industry but many of the measures it relies on are unproven or underdeveloped technologies, for example increased Sustainable Aviation Fuel (SAF) production would have to compete with other demands for feedstocks. The final version of Jet Zero has only just been published and so GAL will need to review and amend the environmental and policy assessments for the DCO accordingly. It should be also noted that the consultation on the main strategy and the supporting evidence stated that the scenarios are no more than illustrative so not necessary the defined route to net zero. The final strategy also set an emission reduction trajectory for the industry, so GAL will need to have regard to that.

With a legal duty to act on carbon emissions, the government may be forced to act beyond the scope of Jet Zero to reduce emissions, which could be through limiting capacity at airports or increased carbon pricing. Gatwick should not rely on the proposals in Jet Zero to meet carbon reduction targets and should go beyond the scope of these measures to both achieve net zero and mitigate the potential consequences for the industry if net zero is not reached. Indeed, all airports will have to actively take action to achieve net zero, such as supplying SAF.



Although increased capacity at Gatwick is included within the Jet Zero modelling, this is not to pre-judge planning consents and should not be relied upon by Gatwick as an indication of the acceptability of the NRP scheme. Likewise, nor should the stated support for airport expansion expressed in Jet Zero, as GAL will need to demonstrate the NRP is sustainable and justified.

The High Ambition scenario has been committed to in Jet Zero, but even the most ambitious scenarios resulted in residual carbon emissions in 2050 that would require abatement outside of the aviation industry (in the technical consultation the 'High Ambition with breakthrough in SAF' scenario achieved net zero within the industry, but there are significant barriers to achieving this in reality). This means aviation will rely on other sectors to offset its carbon emissions, and the benefit of those reduced emissions from other sectors is not felt. One way to reduce abatement required outside of the aviation sector is to restrict growth in carbon emissions by restricting expansion of that sector.

Paragraph 3.8.9 proposes to forecast conformity with the High Ambition scenario. This has been set as the monitoring target by Jet Zero and used to set the in-sector CO<sub>2</sub> emissions reduction trajectory, even though it still requires 37% of emissions to be abated outside of the aviation sector in 2050. This is a target against which the government can judge the progress of the aviation sector as an indicator of when it needs to intervene with more stringent measures.

If the Environmental Statement submitted with the DCO is to take a realistic view then it should be tailored for Gatwick with its specific fleet mix and operators (e.g., freight/passenger aircraft, size of aircraft, age of aircraft) as well as the measures Gatwick proposes to introduce and that are more than likely to be introduced nationally/internationally. The assumptions in the modelling will need to be fully explained and justified, e.g., where a particular airline's fleet serving Gatwick is young, then what is the expected fuel/airframe efficiency improvement impact at Gatwick over the next 28 years considering the typical operational lifespan of a new aircraft? Furthermore, if the NRP releases capacity for larger aircraft (which is one means of increasing passenger numbers without a corresponding increase in ATMs) then the carbon impact of this change in fleet mix should be accounted for in comparison to the baseline. This approach would reflect the Planning Inspectorate's Scoping Opinion that mitigations to be relied upon should be "demonstrably secured," noting that the Jet Zero scenarios are not based on this level of certainty.

A supplementary sensitivity test based on the assumptions in Figure 3 of the Jet Zero analytical annex would be one means of evaluating a forecast in conformity with it (i.e. 10% SAF by 2030, 22% by 2040, 50% by 2050; 2.0% fuel efficiency improvements per year; etc.). However, the scenarios in Jet Zero are illustrative



routes to net zero and not prescriptive about how it is done or what might happen in the industry and so we do not believe that a blanket approach of taking the assumptions in the High Ambition scenario and applying them to Gatwick would produce meaningful results for the Environmental Statement assessment.

In terms of the assessment of cumulative impact on climate change, contribution of the scheme to the UK carbon budgets is one means of doing this. However, it is only meaningful if it considers all background growth and expansion across UK economic sectors. Considering any proposal in isolation against the carbon budgets will result in a commentary that each of them only contributes a small percentage to each budget but the cumulative impact will in fact be missed, hence defeating the object of the assessment. Even a small impact can risk the ability for carbon reduction targets to be met

We would advocate the review of all committed airport expansion proposals and the sector's background growth in the UK as a contribution to UK carbon emissions and the budget for the aviation sector. This should be based on the aviation sector-specific (domestic and international) targets set out in Jet Zero (35.4 MtCO<sub>2</sub>e in 2030, 28.4 MtCO<sub>2</sub>e in 2040, and 19.3 MtCO<sub>2</sub>e in 2050). The NRP's contribution to these targets should be assessed for each of those years, which would align with the Planning Inspectorate's Scoping Opinion to assess impacts against sector specific carbon budgets.

In addition to carbon, non-CO<sub>2</sub> impacts on climate (such as contrails) should also be addressed in the Environmental Statement chapter on climate change where there is evidence available.

### **Noise**

We note that the consultation recognises the establishment of the Noise Envelope Group. Our comments from the Autumn 2021 consultation remain unresolved and should be addressed through the Noise Envelope Group.

### **Housing and Infrastructure Impacts**

We welcome the refresh of the socio-economic studies and hope that they will provide a disaggregated breakdown of the economic impacts on the surrounding counties, as we requested at the previous consultation. This will improve the understanding of the economic benefits of the airport on Kent specifically.

We also support the more detailed analysis of construction employment given the multiple Nationally Significant Infrastructure Projects in the South East (and beyond) in the same timescales as the NRP.