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Growth, Environment &
Transport
Sessions House
Maidstone
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ME14 1XQ

Interested Party
Reference Number:
20044780

Date: 9 June 2025

Dear Sir/Madam

RE: Gatwick Airport Limited for an Order Granting Development Consent for the Gatwick Airport Northern Runway Project

Request for comments in response to the applicant's submission of additional information on 24th April 2025

Following the publication of Gatwick Airport Limited's (GAL) additional information in response to the Secretary of State's letter dated 27th February 2025, Kent County Council (KCC) would like to provide the following comments.

Requirement 15

KCC supports the Joint Local Authority (JLA) response relating to Requirement 15.

The Noise Envelope is set to ensure that the benefits of noise reductions over time are shared with communities around the airport, to control noise, and to give people certainty on what their noise environment will be like into the future. This latter point is a key determinant of levels of annoyance with aviation noise.

Requirement 18

KCC supports the JLA response relating to Requirement 18.

We would emphasise that the noise disturbance is a very significant concern for us and our residents, which is exemplified by locations in Kent producing some of the highest number of noise complaints for Gatwick's current operations. The Noise Insulation Scheme (NIS) extends into Kent but does not cover the most populous areas, which naturally produce the most complaints (such as Royal Tunbridge Wells). Similarly, some of Kent's rural communities that already suffer from aircraft-related sleep disturbance will not be protected by the NIS.

We welcome any enhancements to the NIS but it should be remembered that there is an element of subjectivity to one's personal experience of aviation noise. Those outside of the NIS area may also be personally significantly adversely affected. The Scheme will also not resolve the impact on outside spaces, such as our National Landscapes and irreplaceable heritage assets, such as Hever Castle.



Requirement 20

Throughout the Examination and subsequent Secretary of State consultations, KCC's key concern on surface access has been the forecast growth of air passengers using coach services between Gatwick and Kent. We consider this growth to be over-ambitious based on our experience of trying to promote similar services in recent years.

If this ambitious patronage is not realised, there is an associated risk that private vehicle trips between Kent and Gatwick are higher than forecast, taking the merges and diverges of the M25 Junction 7 (M23) over capacity.

Conversely, 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 and departures at Gatwick.

Further, although delivery of direct rail services between Kent and Gatwick is outside of the Applicant's direct control, they are able to continue to fund feasibility work such that the link becomes more achievable in future. This not only affects their future mode share targets, but is vital for maximising the potential economic benefits of the Airport (including in its current form) for Kent's towns, businesses and the tourist industry. As currently drafted, the Surface Access Commitments 14A and 14B do not appear to be conducive to funding such work.

The additional information received from the Applicant does not alter our position. Whilst we do appreciate GAL's point that factors beyond their control will have an influence on public transport mode share, delivering the package of Strategic Road Network enhancements as an alternative that still permits dual runway operations will only further increase the proportion of airport users accessing it by private vehicle.

To be clear, KCC's position remains that we do not support growth at Gatwick Airport. However, if the Secretary of State remains minded to approve the Northern Runway Project then that growth should be managed so that it is as sustainable as possible in accordance with the Airports National Policy Statement. This includes controls on ensuring that the Surface Access Commitments are met. In this respect, the wording of Requirement 20 as proposed by the Examining Authority is far preferable to that proposed by the Applicant.

We appreciate the opportunity to comment on this issue.

Yours faithfully

Simon Jones

Corporate Director – Growth Environment and Transport