



# Gatwick Airport Northern Runway Project

Written Summary of Oral Submissions from Issue Specific  
Hearing 1: Case for the Proposed Development

**Book 10**

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## 1 Introduction

- 1.1.1 This document contains Gatwick Airport Limited's (the "**Applicant**") summary of oral evidence and post hearing comments on submissions made at Issue Specific Hearing 1 ("**ISH1**") held on 1 March 2024. Where the comment is a post-hearing comment submitted by the Applicant, this is indicated. The Applicant has separately submitted at Deadline 1 (Doc Ref. 10.9.2) its response to the Examining Authority's ("**ExA**") action points arising from ISH1, which were published on 5 March 2024 [\[EV7-005\]](#).
- 1.1.2 This document uses the headings for each item in the agenda published for ISH2 by the ExA on 30 January 2024 [\[EV2-001\]](#).
- 1.1.3 The Applicant, which is promoting the Gatwick Airport Northern Runway Project (the "**Project**") was represented at ISH1 by Scott Lyness KC, who introduced the following persons to the ExA:
- 1.1.3.1. John Rhodes (JR) OBE, Senior Director, Quod.
  - 1.1.3.2. Tim Norwood, Chief Planning Officer, Gatwick Airport Limited;
  - 1.1.3.3. Andy Sinclair, Head of Noise and Airspace Strategy, Gatwick Airport Limited;
  - 1.1.3.4. Jonathan Pollard, Chief Commercial Officer, Gatwick Airport Limited
  - 1.1.3.5. Rob Walker, Director, ICF
  - 1.1.3.6. Johanna Forbes, Business Change Manager, formerly the Senior Airport Capacity Manager, Gatwick Airport Limited.

## 2 Agenda Items 1 and 2: Welcome, introductions and arrangements for the Hearing; Purpose of the Hearing

- 2.1.1 The Applicant did not make any submissions under these agenda items.

## 3 Agenda Item 3: Policy and extent of the proposed works

- 3.1.1 **The Applicant will be asked for its view on the extent, breadth and relevance of policy, guidance, and caselaw relating to the Proposed Development; specifically concerning, but not restricted to:**

- **Airports National Policy Statement (June 2018).**
- **Beyond the Horizon – Future of UK Aviation (June 2018).**

- **Jet Zero Strategy (July 2022).**
- **Recent caselaw and planning approvals/ proposals in the London Airport System.**

- 3.1.2 The ExA asked the Applicant to confirm its view on the applicability of the Airports National Policy Statement (ANPS) to the application.
- 3.1.3 The Applicant explained the ANPS provides the principal policy framework for this application. First, we know that the principal policy framework is not provided by the National Planning Policy Framework or the Local Plan, because both of those documents say directly that they don't contain policies for nationally significant infrastructure projects. The Local Plan (at paragraphs 1.38 and 9.5) explains that any decision relating to significant growth at Gatwick would be a matter for national policy. In this case the two relevant national policy statements (NPSs) are the ANPS and the National Networks National Policy Statement (NNNPS). Formally the NNNPS has effect for the highway works within the application but the ANPS does not formally have effect for the application. The Applicant's position is that, because this is an aviation application, the ANPS is the more important NPS for the purposes of this examination. Although the highway works are important in their own right, they are being brought forward ancillary to and in support of, the airport development.
- 3.1.4 Secondly, the ANPS tells us that it provides government policy for airport nationally significant infrastructure projects in the South East, and it provides government policy for any new runway capacity in the South-East (paragraphs 1.13 and 1.14). It states that it will be important and relevant to any decision on aviation development particularly in London and the South East (paragraph 1.41). Therefore, the ANPS states that it is the relevant national policy for this application.
- 3.1.5 The Applicant added that it had discussed the application of sections 104 and 105 of the Planning Act 2008 with the legal representative for the Joint Local Authorities prior to ISH1, and subsequently proposed that the Applicant would submit further information at Deadline 1 about how it considers the interrelationship of these provisions applies to this application. This can be the basis of a discussion with the JLAs to reach an agreed position. The Applicant noted it is perhaps an unusual case where the primary element of the project is subject to an NPS which does not have effect, whereas the secondary element is subject to an NPS which does have effect. It is recognised that there is a question to be considered, albeit the Applicant does not anticipate there being any difference between the parties that will necessarily affect the destination or outcome.

- 3.1.6 **[Post-Hearing Note:** The Applicant has provided further information in relation to this matter in its separate responses to the ExA's action points arising from ISH 1 (Doc Ref. 10.9.2), in response to **Action Point 1]**.
- 3.1.7 The ExA noted that many interested parties, both in their relevant representations and in the open floor hearings, expressed their view that the proposal constitutes a new runway as opposed to an alteration of an existing runway and asked for the Applicant's response to this.
- 3.1.8 The Applicant explained that the northern runway exists and operates today but is plainly underused. The application is proposing to reposition it by 12 metres which allows it to come into proper operational use. The Applicant recognised that question arises from the encouragement in the ANPS for airports 'making best use' of their existing runways (reinforced by the Beyond the Horizon policy document released at a similar time). It cannot be the best use of the runway if it lies idle. There have been proposals by other airports where 'making best use' (MBU) has included operational development of the airport infrastructure and not simply increasing the use of the runway. The Government's understanding of MBU, includes this runway project as confirmed through its Jet Zero Strategy and associated case law.
- 3.1.9 The ExA asked for further reference to the relevant case law.
- 3.1.10 The Applicant referenced the Stansted Airport decision and the Manston Airport decision as examples. The Stansted Airport decision approved two new taxiways linked to the existing runway, six additional remote aircraft stands and three additional aircraft stands. In paragraph 17 of the decision and footnote 5 the Inspectors confirmed that "*there is nothing in MBU which suggests that making best use proposals cannot involve operational development of the type proposed in this case.*" The Manston Airport decision included an upgrade of a runway, realignment of the parallel taxiway, new stands for multiple air freight aircraft installations, a new high mast lighting for framework and new cargo facilities. There was no suggestion that MBU was not applicable.
- 3.1.11 The ExA suggested that a counter is that those examples are of operational development at airports, which could potentially be carried out under permitted development powers, whereas the works for this application do not fall within that bracket.
- 3.1.12 The Applicant responded that it does not see a correlation between the scope of permitted development rights and the coverage of MBU policy. There is nothing in the ANPS to suggest that the application of MBU would be limited in that way. Looking at the objectives of the ANPS (for example, at paragraph 1.6), it is

apparent that both the Aviation Policy Framework and the Airports Commission were generally concerned with the need to increase aviation capacity. There is nothing to suggest that that wouldn't embrace making innovative use of existing runways or existing standby runways which are underused. The policies themselves are broad enough to encompass the works envisaged in this case.

- 3.1.13 **[Post-Hearing Note:** The Applicant has provided further information in relation to this matter in its separate responses to the ExA's action points arising from ISH 1 (Doc Ref. 10.9.2), in response to **Action Point 3**].
- 3.1.14 The Applicant further noted that that whether the proposed works to the runway constitute permitted development is a different question from whether this is an application for a new runway. The Applicant invited the ExA to compare, for example, what would be involved in, building the new runway at Heathrow Airport or a new southern runway at Gatwick, as envisaged in the Airport Commission process. Those new runways would involve substantial extensions to the airport boundary into surrounding land. It is that scale of development that is understood to be "new runway". This application is for operational development within the existing boundary of the airport.
- 3.1.15 The ExA commented that the works to the northern runway appear to be fairly substantial; moving the centreline of the runway 12 metres north and the knock-on effects on the Juliet taxiway and airfield support facilities. The ExA noted that the application proposes to allow the two runways to operate at the same time, which they cannot now and asked the Applicant whether that does not, in effect, mean that it should be considered a new runway.
- 3.1.16 The Applicant disagreed and explained that the northern runway does exist now and is / can be used at the moment. That is entirely different from creating a new runway. This is supported by the fact that no new airspace is required for the application. It is a relatively small repositioning of the runway - a movement of the existing runway and not the creation of a new runway.
- 3.1.17 The ExA asked what construction activities are required for the repositioning of the runway and whether it is as simple as tarmacking the further 12 metres required, or does it require the runway to be dug up and new foundations and top profile works to be carried out.
- 3.1.18 The Applicant referred to the **Project Description Signposting Document** [[AS-137](#)] which reconciles the different ways the Project was described in various application documents and noted that it explains that the works involved are removing a redundant strip of hardstanding and returning it to grass to the south of the repositioned northern runway, and also the resurfacing of the repositioned

northern runway. This is not digging up the runway and replacing it. The Applicant offered further detail at Deadline 1.

- 3.1.19 **[Post-Hearing Note:** The Applicant has provided further information in relation to this matter in its separate responses to the ExA's action points arising from ISH 1 (Doc Ref. 10.9.2), in response to **Action Points 4 and 5**].
- 3.1.20 The ExA asked whether the existing northern runway has the capacity to receive all types of aircraft; beyond Code C.
- 3.1.21 The Applicant explained that the northern runway is used for the arrival and departure of all codes of aircraft today, but this is in a single runway mode of operation rather than the dual mode which forms the basis of this proposal.
- 3.1.22 The ExA notes that paragraph 1.29 of the Beyond the Horizon: Future UK Aviation document states that the government is supportive of airports beyond Heathrow making best use of their existing runways. Paragraph 1.29 could be interpreted as referring to projects that require consent from local planning authorities and not projects of a size which fall to be considered under the Planning Act 2008. The ExA asked the Applicant for its view on that interpretation.
- 3.1.23 The Applicant referred to paragraph 1.27 of the same document that identifies that there may be applications to increase capacity through MBU by more than 10 million passengers per annum, which would qualify as nationally significant infrastructure projects to be dealt with in the way that this application is being addressed.
- 3.1.24 The ExA noted that paragraph 1.29 is the concluding paragraph and asked the Applicant whether it considered that there is any distinction to be drawn between the two paragraphs on that basis.
- 3.1.25 The Applicant said no and explained that Gatwick Airport is the largest airport in the UK apart from Heathrow, so it's perhaps not surprising that MBU at Gatwick Airport involves a larger capacity increase. Paragraph 1.29 says such an application should be considered by the "relevant planning authority". In this case, the relevant planning authority is the Secretary of State (SoS) and paragraph 1.27 makes it clear that the policy anticipates including development of this scale.
- 3.1.26 **[Post-Hearing Note:** this interpretation is consistent with the ANPS at paragraph 1.42 which contemplates that MBU applications may be brought forward through TCPA or DCO applications.]

- 3.1.27 The ExA noted that the Applicant's **Needs Case** [APP-250] explains that the Jet Zero Strategy predicts a growth of 70% in passenger demand between 2018 and 2050, and that the airport capacity assumed in the government's assessment in support of the Jet Zero Strategy incorporated known airport expansion, which included the Northern Runway Project (NRP) for which it assumes a maximum capacity of 386,000 air transport movements per year, which is consistent the level included in the assessment for this application. The ExA asked the Applicant whether it considers that the inclusion of the proposal in the modelling for the Jet Zero Strategy the represents policy support for the proposed development and whether the Applicant considers the Jet Zero Strategy to be government policy.
- 3.1.28 The Applicant confirmed that it definitely sees the Jet Zero Strategy as government policy. The inclusion of the NRP in the modelling is not a policy statement. It is an understanding by government of capacity which is consistent with its policy. It is described to represent government's understanding of airport capacity that is consistent with MBU and with the ANPS, and that is set out in the Jet Zero Modelling Framework (at paragraph 3.18 and Annex D), which supports the Jet Zero Strategy. It's helpful in understanding that, first of all, the government understands the scale of the proposals to be consistent with MBU and secondly, that its modelling of the carbon impacts, of that scale of growth, including the NRP, are consistent with its net zero commitments.
- 3.1.29 The ExA referred to the statement within the Jet Zero Consultation Data Set (the Modelling Framework) that informed the Jet Zero Strategy, that the assumptions for the Jet Zero modelling, do not represent any proposals for limits on future capacity growth at specific airports; nor do they indicate maximum appropriate levels of capacity growth at specific airports for the purpose of planning decision making. The ExA asked the Applicant for its reflections on this statement.
- 3.1.30 The Applicant explained that the government position has moved on since Beyond the Horizon to some extent. For example, in Beyond the Horizon, the government said it thought it likely that expansion through MBU would be consistent with its carbon policies. Then in the Consultation for Jet Zero Modelling and the Jet Zero Strategy it said directly that the scale of capacity, including the NRP, is consistent. Most recently, in the Government's annual response to the Climate Change Committee it said that, in "*all modelled scenarios, we can achieve our net zero targets*" taking account of the scale of airport capacity that is planned.
- 3.1.31 The ExA referred to the Applicant's **Needs Case** [APP-250] and noted that the narrative on passenger demand refers to the suspension of works by Heathrow



Airport on its third runway and the SoS's conclusions in the Manston Airport decision. The ExA asked whether the Applicant is aware that an appeal has been granted in the Manston Airport case and one of the grounds of the appeal is whether there was an error of law over whether potential for growth at other airports is a material consideration or not and asked whether this altered any of the Applicant's conclusions.

- 3.1.32 The Applicant replied that the appeal did not alter its conclusions in relation to Heathrow. In the Manston Airport decision, the SoS considered the question of whether the potential for other airports to expand in the future affected the needs case for the development proposed. Taking a different approach from the ExA, the decision letter concluded, at paragraph 97, that there was no certainty that capacity from such applications would be delivered. Plans for future growth could be modified or changed, or they may not come forward at all. Any applications would be subject to the relevant planning process and may not ultimately be granted consent by the decision-maker and further, investment may not come forward. In the decision letter the SoS gave no significant weight to the prospect of potential capacity coming forward.
- 3.1.33 As the ExA's question acknowledged, there was a High Court challenge to the decision to grant consent: *Dawes v. SSTD* [2023] EWHC 2352 (Admin). The grounds of challenge included allegations relating to the way the SoS had reached conclusions on need. The Court rejected the claim that the SoS had been wrong in his approach to the issue of capacity. It should be noted that the judgment addressed an argument about the terms of a ministerial briefing that were not precisely the same as the draft decision letter that was considered by the SoS before the final decision was issued in a slightly different form. In summary, however, and directing its attention to the briefing and the draft letter, it was held that the SoS had not treated capacity at other airports as irrelevant but had lawfully decided that the potential for airport capacity expansion elsewhere was something to which very little weight could be attached. Matters of weight were for the SoS as decision maker.
- 3.1.34 **[Post Hearing Note:** The Applicant understands that permission to appeal to the Court of Appeal was granted recently. Insofar as the appeal relates to the specific terms of the briefing, it may turn on the specific circumstances of that case, because it does not appear to be in dispute in that case if capacity at other airports is material, matters of weight (such as the finding that no significant weight should be given to possible capacity at other airports) are for the SoS.

In this application, the Applicant does not suggest that the third runway at Heathrow Airport (Heathrow R3) (or other possible schemes) must be treated as

legally irrelevant to the question of need, but its general position is that the SoS should again give no significant weight to such potential development when reaching the decision in this case. The position on Heathrow R3 in particular is set out in paragraph 4.1.3 of the **Forecast Data Book [APP-075]**.

After designation of the ANPS, preparatory work began on the Heathrow R3 application in anticipation of it being made but this was suspended as result of pandemic in 2020 and no scheme has come forward since then. Even if its inclusion in the ANPS is assumed to be sufficient to justify treating that development as material for the purposes of assessing need, it should not be assumed that it will come forward and as matters stand the uncertainty means that it should be given very limited weight. That is why it has been treated as a sensitivity only in the Forecast Data Book – see Annex 4. All that said, however, it is no part of the case for this scheme, including the sensitivity analysis, that it should somehow supplant Heathrow R3. Both MBU and Heathrow R3 are supported directly by ANPS policy and the proposed growth at Gatwick is needed and complementary to any Heathrow R3 scheme.]

- 3.1.35 The Applicant further explained that the point being made by the SoS in the Manston DL, which is not unreasonable, is that one cannot presume that Heathrow R3 will be promoted, consented and constructed. But it is not a binary choice; both Heathrow R3 and NRP are required and supported by policy. It may take a while for Heathrow R3 to be developed - the ANPS assumed its operation by 2030 (which is no longer credible following the subsequent delays to the scheme) - so the need for other capacity before Heathrow R3 is operational is even greater. However, support for MBU of existing airports does not stop with the construction of Heathrow R3. The policy support is not expressed to be time or scheme limited: it is before and after, with and without Heathrow R3.
- 3.1.36 The Joint Local Authorities (JLAs) suggested that there is some ambiguity and uncertainty as to the scope of the ANPS and that there are parts which use the expression "existing infrastructure" and "existing runway" and considered that the interpretation of MBU in this case was not clear. The JLAs requested further clarity about the engineering works required to deliver the works to the northern runway to allow them to determine whether this is an alteration or an entirely new runway. The **Project Description [AS-133]** at paragraph 5.2.22-23, says that the intention is to retain current width of the northern runway at 45 metres and to move it and its 'shoulders' 12 metres north, resulting in the central band being resurfaced. The JLA's position was that it was not clear that the Jet Zero Strategy actually endorses the NRP and gave further views about the interpretation of the policy.

- 3.1.37 The Applicant responded to the comments made by the JLAs by stating that it is important to look at the drafting in its proper context. 'Existing runway' and 'existing infrastructure' are used interchangeably. The intention and meaning are clear – to make the best use of existing airport capacity. Regarding the questions around 'resurfacing', the Applicant reiterated that these works should not be read to amount to a new runway. Similar resurfacing works were conducted recently on the main runway, with no suggestion that it involved the creation of a new runway.
- 3.1.38 The Applicant stated that it was not aware, from discussions to date with the JLAs of any doubts as to the need for the Project. Compared with other recent proposals for airport expansion, the case for Gatwick is not based purely on forecasts of growth. What is unusual about the need case at Gatwick Airport is that it is needed today, and for two principal reasons: there is already an overhang of documented unmet demand that cannot be satisfied today by the existing capacity at Gatwick Airport and there is a need for resilience at the airport, which has the busiest daytime single runway in the world.
- 3.1.39 The Applicant added that the Jet Zero Strategy did look to assess the capacity of current runway proposals elsewhere in order to satisfy itself that Jet Zero and Net Zero could still be met. What the documents demonstrate is that those listed projects represented the government's understanding of projects which were consistent with MBU and with the ANPS.
- 3.1.40 CAGNE commented that they considered paragraph 1.42 of the ANPS to mean that "additional to" is different from "the need for". The Applicant must demonstrate a need. They consider that going from a single runway to a dual operation runway goes beyond MBU. It would be wrong to interpret Jet Zero as giving any policy support to any of the schemes contributing to its modelling.
- 3.1.41 The Applicant responded to CAGNE explaining that it welcomed a close reading of paragraph 1.42 of the ANPS. It would be misreading the ANPS to argue that it set up need as a free-standing policy test. In fact, it states that applications would be considered 'on their merits'. No doubt the existence of a need is important and relevant and helps establish the benefits of the Project would be a benefit, but it is not a test. It would be odd if it was, given that paragraph 1.39 of the ANPS has already established that government is supportive of airports beyond Heathrow making best use of their existing runways, given the need established by the Airports Commission and endorsed in the ANPS. This point was directly acknowledged by the decision makers at Stansted<sup>1</sup> and at Manston<sup>2</sup>.

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<sup>1</sup> Stanstead Airport Decision Letter paragraph 17

<sup>2</sup> Manston Airport Decision Letter paragraph 37

## 4 Agenda Item 4: Recent Growth

### 4.1.1 The Applicant will be asked about the recent growth of the Airport, including questions relating to the following areas:

- Long haul traffic and market.
- Low cost carriers' market.
- Passenger catchment.
- Effect of Covid-19.
- Runway capacity
- Slot values and the slot market, to include extent and details of the powers of the Independent Slot Coordinator.

4.1.2 The ExA referred to the Applicant's **Needs Case** [APP-250]. In paragraph 4.1.10 it sets out that in the 10 years leading up to 2019, there had been a growth of 10 million passengers per annum (mppa) in short haul (primarily low cost driven), and a growth of 4 mppa in long haul overseas. The ExA asked the Applicant where the additional long haul traffic comes from and whether any of this is from constraints at Heathrow Airport.

4.1.3 The Applicant explained that the predominant sources of that long haul growth are from the China, Asia, Indian markets in particular. There are certain carriers that have not been able to fulfil their growing ambitions at Heathrow Airport because of the capacity constraints and Gatwick Airport has been a beneficiary of those. However not all of the long haul volume at Gatwick Airport is driven by capacity limits at Heathrow Airport. There are carriers, like Air Mauritius, that consider that the catchment and operation of Gatwick Airport is better suited to the type of operation that they are operating and carriers who operate out of Gatwick to broaden their appeal in the vast London and South East aviation market benefitting from the airport's strong catchment. Other carriers, like British Airways, have a long-established long haul operation at Gatwick Airport.

4.1.4 The Applicant added that Gatwick Airport saw approximately 12% compound annual growth rates (CAGR) for long haul traffic. This is the average level of growth over a five-year period (2014 to 2019).

4.1.5 The ExA asked the Applicant whether Gatwick Airport operating as primarily a point to point airport (as opposed to a hub airport like Heathrow) hinders its long haul growth.

4.1.6 The Applicant confirmed it does not. The extent of the uplift in long haul passengers and cargo demonstrates that there is a significant depth of markets that are not reliant on connecting traffic and that are predominantly point to

points, in demand characteristics. The Applicant explained that in its growth forecasts for the next 20 to 25 years they are expecting the most growth from North America, China and Asia. These markets have significant depth and are not reliant on connecting traffic.

- 4.1.7 Many markets served at Gatwick (and Heathrow) are hubs themselves so significant volumes will hub at the other end rather than London. Compared to other markets, London's 'local' market (excluding transfers) is significantly larger than any other aviation market in the world.
- 4.1.8 The ExA asked the Applicant if it can envisage a scenario where Gatwick Airport becomes more of a hub airport like Heathrow, particularly if Heathrow remains constrained.
- 4.1.9 The Applicant highlighted that Gatwick Airport does have transfer traffic that self-connects and a significant volume of passengers connect from the low cost services onto long haul. The airport also benefits from some traditional transfers between airline partners, for example British Airways (connecting to itself, short haul to long haul) and partners (e.g. Qatar Airways). However, the Applicant noted that its aspirations are not to create a comparable operation to Heathrow and this is reflected in the forecasts submitted as part of the application (**Forecast Data Book** [\[APP-075\]](#)). The forecasts show that transfers are expected to maintain a small share of overall demand at Gatwick Airport (<5% of total passengers). Gatwick Airport is focused on serving the local market.
- 4.1.10 The ExA noted that the **Needs Case** [\[APP-250\]](#) described Stansted Airport as having only a minimal long haul network and asked the Applicant to identify why that was.
- 4.1.11 The Applicant explained that it was likely to be due to a number of reasons. Firstly, Stansted Airport have tried a number of different carriers over the last 10 to 15 year period and they have not stuck. This is likely due in part to the distance from London, and also because the airport lacks the business travel infrastructure (e.g. premium airline lounges). It also does not provide pier service; it is very important for long haul carriers that when they have an aircraft with between 300-500 seats, that it can park connected to the terminal and allow passengers to disembark. Those are likely the principal factors which prohibit the long haul growth at Stansted Airport.
- 4.1.12 The ExA asked the Applicant why Gatwick Airport has more destinations than Heathrow Airport.

- 4.1.13 The Applicant explained that it is primarily due to the airline mix, and the depth and prosperity of the passenger catchment. Gatwick Airport has one of the largest low-cost point-to-point short haul operations in Europe and the second largest **low cost carrier** in Europe (EasyJet), has their largest base at Gatwick Airport with 25% of their fleet in situ at the airport. Regarding the network offering / passenger catchment, Gatwick Airport is located in a very prosperous area of the UK. There is a significant sum total of people, but also with a very high propensity to fly and with that richness of demand, that is what supports new services and new networks.
- 4.1.14 The ExA noted that 15% of Gatwick's passengers are business travellers and asked how that rate compares with other London airports.
- 4.1.15 The Applicant explained that it is significantly lower than Heathrow Airport, but expects that it would be similar to Stansted Airport and Luton Airport. This 15% is slightly below the wider UK average of 19% but Gatwick Airport has seen business travellers grow significantly over the last decade. Business volumes grew over 50% whilst the share of demand remained relatively constant. This is in contrast to other London airports where they saw volumes and share decline.
- 4.1.16 **[Post-Hearing Note:** The Applicant has provided further information in relation to this matter in its separate responses to the ExA's action points arising from ISH 1 (Doc Ref. 10.9.2), in response to **Action Point 6**].
- 4.1.17 The ExA noted that the **Forecast Data Book [APP-075]** at paragraph 5.5.8, states that in 2019, Gatwick Airport had a larger share of short-haul demand originating/terminating in the London market than any other airport. The ExA asked the Applicant how much of the demand for Gatwick Airport came from the north, north-east and east of London.
- 4.1.18 The Applicant explained that in terms of the Gatwick specific passenger volume, 82% of passengers in 2019 were from either the Greater London or south-east England.
- 4.1.19 Approximately 90% of Gatwick's passenger volume comes from its core catchment area: the surrounding counties and south London. In terms of overlap, Gatwick has a much greater overlap with Heathrow than the north London airports. The Applicant confirmed that a detailed breakdown would be submitted at Deadline 1.
- 4.1.20 **[Post-Hearing Note:** the Applicant has provided further information in relation to this matter in its separate responses to the ExA's action points arising from ISH 1 (Doc Ref. 10.9.2), in response to **Action Point 7**].

- 4.1.21 The ExA asked the Applicant to expand on the belief that Gatwick Airport is better connected to Central London than the other London airports like Stansted and Luton.
- 4.1.22 The Applicant explained that Gatwick Airport has two key rail connections: the Gatwick Express / Southern services direct to London Victoria, and the Thameslink service to various core London stations well connected to the London underground, including Kings Cross St Pancras. Both of these services run very frequently and take approximately half an hour to Central London. By comparison, the journey time from Stansted Airport to Central London is 47 minutes, and that from Luton Airport is more than 35 minutes with the exact duration dependent on the connection time with the DART shuttle from the airport terminal to Luton Airport Parkway station.
- 4.1.23 The ExA asked the Applicant whether business travel has returned following the COVID-19 pandemic noting new virtual working arrangements and if it is expecting a similar level of recovery for business travel as for leisure.
- 4.1.24 The Applicant explained that business travel has returned more slowly than leisure travellers. Gatwick Airport estimates that business traffic recovery will continue to lag that of leisure short haul travellers although trends through 2022-23 remain positive so the long-term outlook still reflects growth. After previous shocks, such as the Global Financial Crisis business travellers grew in every year after 2010 up to 2019.
- 4.1.25 The **Forecast Data Book** [[APP-075](#)] records at paragraph 3.1.2 that the summer 2022 figures were back to 80% of what they were pre-pandemic. That would have been higher were it not for the ongoing travel restrictions and resourcing challenges. The nature of the activity at the airport and the airlines require security clearance. Recruiting, training and getting security clearance for the number of people needed for the airport and airlines to operate presented timescales that were unavoidable and delayed the response to the significant increase in demand.
- 4.1.26 The ExA noted that it understands that the airport can achieve 55 scheduled air transport movements (ATMs) per hour on the existing runway and that this is up from 53 ATMs an hour in 2012. The ExA asked the Applicant to explain how that has been achieved.
- 4.1.27 The Applicant explained that the current single runway operation accommodates 55 air traffic movements per hour during periods of peak demand, making it the most efficient single runway operation (on an hourly basis) in the world. The determining factors on aircraft throughput capacity are:

- The capability of the ground infrastructure / operation to facilitate optimal aircraft throughput.
- The capacity of the single runway/s to accommodate all arriving / departing aircraft.
- The capacity of the airspace, including the Standard Instrument Departure (SID) routes from the runway to accommodate departing aircraft.

- 4.1.28 If the single runway operation was not a constraint and Gatwick used optimum sequencing and operated a medium sized aircraft fleet (A320 / B737 types) then the airspace could achieve an aircraft throughput capacity of up to 60 departures per hour. If arriving aircraft were optimally separated at 3nm (nautical mile) intervals on the approach to the runway, this could achieve 48 arrivals in the same hour. This creates a theoretical airspace maximum capacity for arrivals and departures of 108 air traffic movements per hour.
- 4.1.29 In terms of design, the single runway operation is the constraining factor on aircraft throughput capacity. Optimising the departure sequence is key to achieving the necessary aircraft throughput. The essential features to achieve this are the ground infrastructure and the departure sequence plan created by the Delivery and Ground controllers and executed by the Air Controller, who is responsible for the operation of the runway.
- 4.1.30 Having created a good plan for the aircraft departure sequence, the plan is executed through the use of parallel taxiways and alternative holding areas. Multiple access points to the runway enable the Air Controller to tactically react to operational constraints, either making it easier to follow the original plan or adjusting the plan to deal with a changing situation.
- 4.1.31 There are design features of the SID routes which, when brought together in a configuration, are fundamental to how aircraft can be safely separated on departure. In turn, these design features directly impact the operation of the runway and aircraft throughput capacity.
- 4.1.32 **[Post-Hearing Note:** If SIDs diverge by at least 45° immediately after departure (and no other constraints exist), aircraft are able to depart 60 seconds apart. If the SIDs follow a similar direction or diverge by less than 45° immediately after departure additional time is required between subsequent departing aircraft to achieve a minimum safe separation.]
- 4.1.33 On the day of operation, further optimisation takes place as the Gatwick Tower Air Traffic Control Supervisor works with the Terminal Control Operations Supervisor at Swanwick to consider the strategy for demand over the next few hours, this can include whether there is a bias towards either departing aircraft or



arriving aircraft. There is an ebb and flow of traffic across the day which means there can be a bias towards either arrivals or departures at different times and sometimes there is a broad equilibrium meaning the numbers of arriving and departing aircraft are in balance.

- 4.1.34 The increase from 53 to 55 ATMs was a capacity declaration decision. Gatwick Airport identified the ability to handle 55 movements and, in the context of increasing pressure for slots because of the extent of demand, the Applicant decided to release these two additional slots.
- 4.1.35 The ExA referenced the EasyJet relevant representation [RR-1256] which states that Gatwick Airport is in the lower half of airports in 'punctuality ratings' consistently across Europe. The ExA asked the Applicant the reason for this.
- 4.1.36 The Applicant noted the central theme of EasyJet's relevant representation was the operational capability and delivery at the airport. It is worth highlighting that one of the central benefits of the application is the resilience benefit that it presents. In broad terms, at present there are two runways that cannot be used at the same time so the northern runway operates as a back-up in the event of a service disruption. In practice, it takes up to an hour to switch operations from one runway to the other and the capacity of the northern runway is only 36 movements per hour. Although the northern runway provides some contingency at the moment it is quite restricted. The NRP will enable the airport to recover more quickly from disruptions which will likely address many of EasyJet's concerns.
- 4.1.37 Punctuality is also a wider system consideration and delays can be experienced because of the airlines themselves, other airports or air space delays. Many of EasyJet's flights operate to and from some of the most congested airports and within congested airspace.
- 4.1.38 The Applicant confirmed that it would be responding to EasyJet's relevant representation at Deadline 1 in its **Relevant Representation Report** (Doc Ref. 10.2).
- 4.1.39 The ExA asked the Applicant to explain the role and extent of powers of the airport slot coordinator.
- 4.1.40 The Applicant explained that Gatwick is a Level 3 coordinated airport. The conditions of Level 3 dictate that where demand far outweighs capacity the airport must employ an independent coordinator: Airport Coordination Limited (ACL). The slot capacity of the airport is declared twice a year and ACL will allocate that slot capacity to the market. ACL use a clear criteria of assessment

and evaluation in allocating the slots considering the extent of competition and the size of aircraft. Once those slots have been allocated, there is a secondary slot market where airlines trade their slot allocations for multimillion pound sums which is separate to ACL's jurisdiction.

- 4.1.41 The JLAs commented that there had been productive discussion with the Applicant but the JLAs are not yet comfortable with the assessments provided by the Applicant. They are trying to understand if the airport is already at capacity and with excess demand for slots, how it is possible for the Applicant to have a baseline case at the airport of approximately 67 mppa without the northern runway.
- 4.1.42 The Applicant responded to the comments made by the JLAs confirming that there have been productive discussions between the parties the outcomes of which will be submitted at Deadline 1.
- 4.1.43 [**Post-hearing note:** To inform such discussions, the Applicant produced certain clarifications notes which are now submitted at Deadline 1, specifically the **Needs Case Technical Appendix** (Doc Ref. 10.6), the **Capacity and Operations Summary Paper** (Doc Ref. 10.7) and its accompanying appendix **Airfield Capacity Study** (Doc Ref. 10.7).]
- 4.1.44 In response to comments about the relative rate of recovery post Covid-19, the Applicant noted that whilst overall the recovery of Gatwick airport from the COVID-19 pandemic has been slower than the recovery of Stansted Airport and Luton Airport, the Gatwick rate of recovery for short-haul was actually faster than the other airports. It is the long-haul flights that have taken longer to recover. This is largely because of the variety of timings for countries across the world to open up their borders.

## 5 Agenda Item 5: Need and Future Demand

- 5.1.1 The Applicant will be asked general questions relating to need and future demand, including questions relating to the following areas:
- **The baseline case.**
  - **Future demand forecasts, including methodology, sources, and assumptions.**
  - **Logistics and technical details of the operation of the potential runways.**
  - **Airspace change proposals and update.**
  - **Hotel provision within the proposal.**

**- Airports National Policy Statement 2018**

- 5.1.2 The ExA noted that the baseline case in the application is predicted to diverge from the NRP case in around 2028 and stay at a level that is around 13 mppa lower than the NRP case from around 2032 onwards and that the application predicts a future baseline case of approximately 67 mppa by 2047. The ExA asked the Applicant to confirm that position.
- 5.1.3 The Applicant confirmed that to be correct.
- 5.1.4 The ExA noted that a section of the Applicant's case is obviously based on the fact that Gatwick is already the busiest single runway airport in the world. However, the Applicant also says it is experiencing delays and operational constraints on a day to day basis while suffering from a lack of resilience to cope with more abnormal events. In that context, the ExA asked the Applicant if it considered the baseline case to be realistic and whether 'squeezing more out of the same asset' would result in more delays and operation restrains.
- 5.1.5 The Applicant explained that there are multiple projects in progress to address the current resilience issues as well as support the baseline case. These include:
- 5.1.6 A new rapid exit taxiway. This will not increase the peak declared capacity beyond the maximum of 55 movements per hour currently declared, it will be used in the baseline to improve resilience across the day and improve the capability in hours which previously could not be scheduled at 55.
- 5.1.7 Reduced departure separation. This involves improved sequencing capability and an improved distribution of the workload in the tower amongst the air traffic controllers to better optimise sequencing which will improve capacity.
- 5.1.8 The time-based-separation project. This has not been considered in the baseline case because the full implications are not yet known.
- 5.1.9 The ExA asked the Applicant whether these projects were targeted at dealing with the existing operational constraints of the airport or whether they are equally applicable to the airport reaching 67 mppa.
- 5.1.10 The Applicant explained that the projects will help with both current operations and reaching 67 mppa. They do not increase the 55 per hour declared capacity but they do improve the busy day capability (i.e. delivery of the 55 per hour) and reduce the need for recovery periods after the 55 per hour periods which increases airport resilience.
- 5.1.11 [**Post-Hearing note:** Of the growth to 67 million passengers, the increase in capacity under the baseline is marginal. Of the 20 million growth (From 46.6m in

2019), only 2 million is attributable to growth in the peak periods (a combination of capacity and increased demand in off-peak periods (days and hours) of the peak months, this capacity is then largely used for year round operations. The Applicant has prepared a technical note for submission at this Deadline 1 to provide additional clarification on this matter – **Technical Note on the Future Baseline** (Doc Ref. 10.10).]

- 5.1.12 The ExA asked for confirmation that the Applicant could operate 67 mppa a year off the single runway.
- 5.1.13 The Applicant confirmed this to be the case and further, confirmed that this is central to the forecast in the application.
- 5.1.14 The ExA asked the Applicant to confirm whether it is realistic to expect year-round slot utilisation up to the levels required to operate 67 mppa as there will always be peaks like the school holidays.
- 5.1.15 **[Post-Hearing note:** The largest part of growth in the baseline forecasts relates to larger and fuller aircraft which is similar to historical growth patterns. The peak day at Gatwick is forecast to grow from 924 to 954 movements. This is covered in greater detail in the technical note titled **Technical Note on the Future Baseline** (Doc Ref. 10.10).]
- 5.1.16 The ExA asked the Applicant whether there a tipping point when passengers or airlines would go to another airport because the flight times and flights are more advantageous than flying from Gatwick.
- 5.1.17 The Applicant explained that this would not be in the immediate future because of the extent of the unconstrained demand in the London system which is forecast to significantly outweigh the available capacity across the next 25-30 years. Peaks represent the time when the most amount of demand presents itself to fly but if the cumulative demand continues to increase, which is forecast, then the Applicant is confident that there will be sufficient demand in the winter and shoulder periods to still support that ongoing well observed phenomenon of peak spreading that's taking place. Gatwick has shown strong trends in the period leading up to 2019 regarding the levels of growth in the off-peak seasons outperforming growth in the peak seasons (which are constrained). For example, Gatwick's seasonality has decreased over 20% in the 6 years prior to 2019.
- 5.1.18 The ExA referred to Figure 9.2.1 on page 13 of the **Forecast Data Book [APP-075]** and noted that it shows the baseline case continuing to rise after 2047 and asked the Applicant to confirm whether that is correct and likely.

- 5.1.19 The Applicant confirmed that is correct but is marginal growth as the rate of peak spreading is slowing down but added that the other drivers of demand are still continuing e.g. a further shift to some long-haul traffic and increasing aircraft sizes.
- 5.1.20 The ExA asked the Applicant to confirm what is meant by 'densifying aircraft'.
- 5.1.21 The Applicant explained that there are two factors influencing the densification of aircraft at Gatwick. Firstly, airlines are switching to larger A320 series aircraft and retiring smaller series. The second is the wider industry trend in response to low-cost carriers, where full-service carriers (such as British Airways) densify their fleet by increasing the number of seats within the aircraft.
- 5.1.22 The ExA noted that there are well-publicised issues with the Boeing 737 Max aircraft and asked the Applicant whether that is likely to have an effect on the short to medium term forecast in terms of airlines moving to larger and more efficient aircraft.
- 5.1.23 The Applicant explained that it was the more historic Boeing Max 8 aircraft that had the various issues and those have long been corrected. More recently the Boeing 737 Max 9 variants has reportedly had issues but as these are not operated at Gatwick, the Applicant has not had exposure to that issue.
- 5.1.24 In terms of some of the short-term fleet trends, the Applicant has seen some of the airlines improving their order book in favour of the average gauge of aircraft. For example, EasyJet's recent confirmation of their short to medium term fleet outlook (to about 2030) shows a much more significant shift towards the larger aircraft coming through than they have previously indicated. Over half the EasyJet fleet is planned to be upgraded from A319 aircraft to A321 which have over 50% more seats on each aircraft. EasyJet are a very important customer for Gatwick, making up approximately half the capacity in 2023. This improving trajectory of short-haul airlines ordering significantly larger aircraft gives the Applicant real confidence in terms of its forecast; particularly in the short-haul European market.
- 5.1.25 The ExA noted that the **Funding Statement** [APP-009] estimates that the NRP will cost around £2.2 billion. The ExA asked the Applicant whether, the NRP is cost efficient and sustainable in line with paragraph 4.39 of the ANPS if the baseline produces 67 mppa which is only 13 mppa less than is projected with the project.

- 5.1.26 **[Post-Hearing Note:** The Applicant has provided clarification in relation to this query in its separate responses to the ExA's action points arising from ISH 1 (Doc Ref. 10.9.2), in response to **Action Point 9**].
- 5.1.27 The JLA's commented that there are a large number of variables that go into the way any forecast is created and therefore the JLA's need to ensure that there is no double counting or overly optimistic assumptions. They raised a concern that the Applicant's assumptions rely too much on the baseline scenario.
- 5.1.28 The Applicant responded to the comments by the JLAs by explaining that the substantiation of the forecasted excess demand for Gatwick in the 2030s is based on Government based forecast for demand and capturing all the potential capacity of runway scheme proposed to become operational before 2030. In terms of the London market, any schemes proposed to follow Gatwick will be much later.
- 5.1.29 **[Post-Hearing note:** Assumptions around demand and capacity (nature and timing) is provided in Sections 7.2 and 7.3 of the **Forecast Data Book** [[APP-075](#)]. In addition, the Applicant has provided further information in relation to its forecasting approach in the **Needs Case Technical Appendix** (Doc Ref. 10.6), submitted as part of Deadline 1, including refocusing on the latest, lower outlook for the UK' Government's Jet Zero forecasts from 2023.]
- 5.1.30 The Applicant explained that Gatwick operates in some of the busiest airspace in the world and therefore broader and extra-ordinary global impacts on airspace across the wider European Network affect Gatwick's operation and can cause delays. There are existing issues with European airspace that have been exacerbated by the war in Ukraine and the associated flight restrictions across the region which force many flights to route to the south of the European airspace network to avoid Russian airspace. This increases congestion in the southern part of the European network and in turn can contribute to delays to those flights operating to and from southern Europe and the Mediterranean.
- 5.1.31 In relation to cargo, the Applicant explained that Gatwick does not receive dedicated freight cargo aircraft and prioritises allocation of slot capacity to passenger aircraft and the Gatwick forecasts do not assume dedicated cargo freighters in the future.
- 5.1.32 Further, the Gatwick night flight restrictions limit the type of aircraft which can fly during the night, not just the number. This means that even if Gatwick did receive large freight aircraft, they could not be flown at night. The restrictions are in place to prevent the scheduling of the noisiest types of aircraft at night; for example, it is not permissible to schedule a B747 to arrive at the airport at night.

This application does not impact or change any of those existing night flight controls or restrictions.

- 5.1.33 The ExA noted that the Forecast Data Book [APP-075] details further government forecasts within the government consultation on sustainable aviation fuels dating from April 2023 and asked the Applicant whether there any update on those forecasts following that consultation.
- 5.1.34 The Applicant explained that the "Jet Zero Strategy: One Year On" published in April 2023<sup>3</sup> documentation is the latest modelling published by the Department for transport. The Applicant understands that the Department of Transport are expecting to publish updated forecasting data later in 2024.
- 5.1.35 The ExA noted Jet Zero forecasts published in 2023 were lower than those published in 2017 and asked the Applicant whether it considered this to be a pattern.
- 5.1.36 It was noted that a combination of the short-term outlook capturing updated Covid-19 recovery trends and lower long-term econometric growth assumptions were understood to be the main drivers. However, it was further noted that it was not necessarily a trend that forecasts are trending down as the Applicant understands some of the macro-economic assumptions that were used for these forecasts have now improved.
- 5.1.37 The ExA asked the Applicant whether the NRP would simply add to demand for peak- time slots with a dual runway operation.
- 5.1.38 The Northern Runway is assumed to provide capacity for demand of up to 69 movements per hour. Similar underlying demand profiles seen in the baseline are expected in the future, for example the basing of aircraft of the timings that long-haul carriers use for certain markets.
- 5.1.39 The ExA asked the Applicant whether the NRP forecast contains the same assumptions regarding larger aircraft and the rate of aircraft being upgraded as the baseline case.
- 5.1.40 The Applicant confirmed that they are very comparable. The Applicant has worked within the main airline groupings and at the total level they come out very comparable. The main differences will be some minor airline mix changes within the short haul and long-haul criteria, resulting in minor seats per ATM and low factor differences in the outputs.

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<sup>3</sup> Jet Zero Strategy: One year on (July 2023)

- 5.1.41 The ExA commented that the NRP forecast predicts fairly rapid growth in next generation aircraft and asked the Applicant to provide more detail and to confirm whether all of the new aircraft will be Code C.
- 5.1.42 The Applicant confirmed that not all of the new aircraft would be Code C. The Applicant highlighted that it is a combination of narrow body (largely Code C) but also wide body (largely Code E) coming in as next generation types. Current next generation shares are around 23% and increasing.
- 5.1.43 The JLAs explained to the ExA that there is a methodological disagreement between the parties.
- 5.1.44 The Applicant responded to comments made by the JLAs confirming that it does not accept that the assessment in the application is somehow deficient.
- 5.1.45 **[Post-hearing note:** As trailed at ISH1, the Applicant has submitted at Deadline 1 further detail in relation to top down and bottom-up modelling results, why they are complimentary in nature and why they are used in the Gatwick NRP forecasts is set out in the **Needs Case Technical Appendix** (Doc Ref. 10.6)].
- 5.1.46 The Applicant provided detail regarding slots that provided detail on the current demand requirements of airlines, for example in figure 5.3.3 on page 5-44" of the **Needs Case [APP-250]**. This highlights how some hours already see demand from airlines for over 70 slots per hour multiple times per day. Capacity challenges highlight the importance for the airport to understand its future throughput from a bottom up perspective. Other London airports (Luton, Stansted, Heathrow) all have clearly defined planning limits, for example 19 million passengers at Luton or 43 million at Stansted.
- 5.1.47 The Applicant responded to questions about the validity of relying on the Summer 2020 data considering the pandemic by explaining that the forecast process starts the summer before, so the Summer 2020 forecast was estimated ahead of the COVID-19 pandemic affecting the flights.
- 5.1.48 The Applicant responded to comments about sustainable fuels by explaining that the government's trajectory around the profile demand of flying in the future, and that it does capture issues relating to the cost of flying, whether ETS causing the cost of carbon to increase, or other factors. It is worth noting that UK and international policy is lacking definition in the long term and needs to be recognised when forecasting long term demand for aviation (for example EU ETS, UK ETS, CORSIA, SAF mandates, etc.)
- 5.1.49 The Applicant responded to comments about the reliance on the demand for slots being flawed because airlines tend to request more slots than they need to



be able to sell them on, by explaining that the slots requested by airlines are genuine requests. The carriers at Gatwick can fill their capacity. Across Europe airlines often file for more slots than they could deliver but this doesn't happen at Gatwick.

- 5.1.50 **[Post-Hearing Note:** the Applicant has provided further information in relation to this matter in its separate responses to the ExA's action points arising from ISH 1 (Doc Ref. 10.9.2), in response to **Action Point 12]**.
- 5.1.51 The JLA's commented that a key concern was the ability of airlines like EasyJet and other low-cost carriers to get their flights away in the morning. They reported that they have been asking the Applicant how the early morning departure wave will be handled.
- 5.1.52 The Applicant confirmed that its **Capacity and Operations Summary Paper** (Doc Ref. 10.7) and accompanying **Airfield Capacity Study** (Doc Ref. 10.7) proposed for submission at Deadline 1 includes information around the first wave. Taxi time and holding times are, on average, lower now than was experienced in 2018. This has resulted in a benefit across the whole day in terms of performance of departures. Although there has been a slight increase in taxi time on arrival this is offset by the reduction in airborne holding. Overall, the airport performs better including in the morning wave.
- 5.1.53 In response to a question about sensitivity assessments and carbon budget, the Applicant explained that the forecast modelling has relied on the Government's forecast trajectory so the modelling is based on their assumptions around future policy.
- 5.1.54 The ExA asked whether there is a technical reason why the proposed upgraded northern runway would not be used for arrivals.
- 5.1.55 The Applicant explained that Gatwick currently has two runways that are used for both arrivals and departures. Although the runways are equipped to different standards, they are sufficient to accommodate all codes of aircraft and that will not change as a result of the Project. Currently the two runways cannot be used simultaneously as they are not sufficiently separated to allow independent operations on the ground or in the airspace.
- 5.1.56 The airspace does not change as a result of this project; the NRP will share the same arrival airspace and departure routes as the main runway. This means that the same separation requirements apply as if aircraft were departing or arriving on a single runway, preventing simultaneous arrivals on both runways.

- 5.1.57 In addition to the airspace constraints, the northern runway safety zone for arrivals infringes on key taxiways required to deliver the main runway operation. In the primary direction of runway operation, 26, a significant proportion of the main runway departure holding zone is within the Northern runway arrival safety zone. Aircraft taxiing or holding are not permitted inside the arrival runway safety zone when an arrival aircraft is established on approach to land. The restrictions in this area results in limited access for departures to the main runway resulting in a decrease in capacity rather than increase.
- 5.1.58 The main runway (runway 26L/08R) is operated in mixed mode, which means it accommodates both arriving and departing aircraft. The runway is controlled by the Air Controller, who integrates arrival and departure traffic using the runway. In the single runway mode of operation, a departing aircraft can only enter the runway when the preceding arriving aircraft has safely passed the runway entry point or the previous departing aircraft is far enough down the runway to allow the subsequent departing aircraft to enter the runway safely. The departing aircraft will then be able to take off once the preceding arrival is completely clear of the runway, or the preceding departing aircraft has taken off, and/or any other separation constraints are met.
- 5.1.59 With the proposed dual runway operation, the Air Controller could line up an aircraft ready to take off on the northern runway while an aircraft is making an approach to land on the main runway. Once the arriving aircraft lands on the main runway and is under control, the Air Controller is able to clear the departing aircraft to take off rather than waiting for the arrival to exit the runway.
- 5.1.60 As such, the unutilised runway time in the single runway mode of operation becomes available to use because two aircraft can safely travel along the parallel runways on the ground at same time (one landing and under control on the main runway, the other taking off on the northern runway). The SID routes for the northern runway and the main runway are the same and the routes are operated as if they are being serviced by a single runway. This does not change in proposed dual runway operation.
- 5.1.61 The ExA asked the Applicant why the northern runway is restricted to Code C aircraft and whether it could handle aircraft larger than Code C.
- 5.1.62 The Applicant explained that under the operations today the northern runway can accommodate all codes of aircraft and this is not expected to change. One of the reasons that the London Gatwick operation can be optimised in the way it can, is because of the predominantly medium-sized aircraft fleet mix that is operated from the airport. There is additional complexity with operating larger aircraft on the northern runway including additional separation requirements of larger

aircraft departures that have not been considered in the dual runway operation. Further, there is potential that flying larger aircraft from the northern runway may inhibit the use of some of the ground infrastructure. In particular, the jet blast from the northern runway could impact one of the holding areas used to optimise the pre-departure sequence and as previously mentioned, pre-departure sequencing is key to the aircraft throughput capacity of the runway. Operating the airport in a way that impacts the use of part of the ground infrastructure is likely to inhibit the operation and reduce optimisation.

- 5.1.63 The ExA asked if there is a minimum separation distance between two runways to use both for arrivals.
- 5.1.64 The Applicant confirmed that for dual runway operations to be used for simultaneous arrivals, the runways would need to be separated by 760 meters.
- 5.1.65 [**Post-Hearing Note:** the Applicant has provided further information in relation to this matter in its separate responses to the ExA's action points arising from ISH 1 (Doc Ref. 10.9.2), in response to **Action Point 13**].
- 5.1.66 The ExA noted that the Forecast Data Book states that long haul traffic is predicted to continue taking share away from short haul markets and asked how that would be possible with the slot constraints.
- 5.1.67 The Applicant explained that this is based on carriers switching their short haul operations over to long haul operations by adjusting their portfolio and operating a widebody long haul flights. British Airways and Norwegian Air have both done this. There is also potential for slot trading and incremental new runway capacity.
- 5.1.68 The Applicant confirmed that larger aircraft continuing to use the existing runway had been factored into the forecast and in terms of knock on effects on the relevant environmental assessments (e.g. aviation noise).
- 5.1.69 The Applicant responded to comments from the JLAs about the modelling by confirming that an updated paper that incorporates more pessimistic views of future performance which are based on what can currently be achieved i.e. without any new initiatives. The simulation shows a reasonable worst case in terms of delays compared with what is expected in practice and the Applicant has also illustrated how that performance can be improved. This is submitted to the examination as the **Capacity and Operations Summary Paper** (Doc Ref. 10.7) and **Appendix: Airfield Capacity Study** (Doc Ref. 10.7).
- 5.1.70 In response to comments from the JLAs and the Civil Aviation Authority, the Applicant explained that "airspace modernisation" is a Government sponsored endeavour, in which London Gatwick is fully engaged and is working with other

airspace change sponsors. This will inevitably make airspace operation in London much more efficient, and as a result the London Gatwick operation will benefit. However, the Applicant has always been clear that the delivery of airspace modernisation is not necessary to achieve the aircraft throughput capacity expected by the Project. Part of the reason for that is that London Gatwick is in the south of the London airspace which doesn't experience the issues of complexity and congestion experienced by airports further north in the London airspace.

- 5.1.71 In relation to the WIZAD SID routes, these are not routes which can be flight planned by an airline. It can be offered by a controller when an aircraft is taxiing out for departure and there is poor weather to the north of the airport. It is an alternative to the Route 4 SID routes and has not been relied upon to generate capacity in the airspace because these two distinct routes direct traffic into the same airspace sector. It has, however, been modelled to generate a realistic worst case in the absence of airspace modernisation being delivered. For context, in 2023 just 49 aircraft flew the WIZAD SID route.
- 5.1.72 The Applicant confirmed that it is passing into stage 3 of the airspace change process, which is where it starts to develop the route options and systems of route options in more detail. Given the remaining route options, there are 576 option configurations on the table at this stage. The airspace change process is still at an early stage so has not been assumed in the modelling for the NRP and this Project does not require it. Airspace modernisation, however, does include the requirements of the dual runway operation.
- 5.1.73 [The ExA asked the Applicant for its rationale for the proposed hotels, and why these would not be provided under the baseline case.](#)
- 5.1.74 The Applicant explained that a study of existing provision was undertaken at a number of spatial scales:
- at the airport;
  - close to the airport and linked to the terminals by shuttle buses;
  - within 5 miles or reasonably well connected by rail; and
  - between 5 and 10 miles.
- 5.1.75 That study found that approximately 40% of demand from passengers is currently met at the airport which translates to around 60 rooms per million passengers. The study showed that there was a very high degree of correlation between distance from the airport and demand. Around 85% of demand for hotels at the airport came from airport users. That relationship understandably declines as one moves further away from the airport, is around 80% for those off

airport but directly linked, and for those further away it is around 60%. This shows a very strong functional link for those hotels at the airport in particular, between the airport's activities and the passengers' demand for those rooms.

- 5.1.76 It also shows that there is a very clear passenger preference for being at the airport but there are still a significant number of passengers who are more price sensitive and less time sensitive, who are willing to travel further. Indeed, the study showed that the demand off-airport was stronger for 3-star hotels than it was for 4-star hotels, indicating that price sensitivity point as well.
- 5.1.77 The provision that is made within the NRP is for up to 1,250 rooms at the airport. Looking forward to 2032 when the new runway is close to reaching its capacity of 13 million additional passengers beyond the baseline case, the share of on-airport provision will only vary slightly: down to 39%<sup>4</sup> from 40%. The level of provision in the application allows the airport to maintain that balance of on-airport and off-airport accommodation until the northern runway is fully utilised.
- 5.1.78 As well as meeting the additional capacity delivered by the NRP, it is also taking account of the background growth up to that point. There will, of course, be further growth and further demand off-airport that can be accommodated through traditional planning applications. This is supported both in the current Crawley Local Plan (9.14) and also in the emerging local plan (9.86) which make it clear that the airport itself is a suitable location for hotels, notwithstanding the sequential test, and there is support for those uses (i.e. hotels) to support the operation of the airport.
- 5.1.79 **[Post-Hearing Note:** the Applicant has provided further information in relation to this matter in its separate responses to the ExA's action points arising from ISH 1 (Doc Ref. 10.9.2), in response to **Action Point 14**].

## 6 Agenda Items 6, 7 and 8: Action points arising from the Hearing, Any other business and Close of Hearing

- 6.1.1 The Applicant did not make any submissions under these agenda items.

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<sup>4</sup> To note, the Applicant noted this figure as 37% whilst providing oral evidence at ISH1 but wishes to confirm that the correct figure is 39% as reflected in this written record of the oral submissions.