

16 April 2024

Gatwick Airport Northern Runway Project: Response to the Examining Authority's Written Questions and Requests for Further Information (ExQ1) – CE.1.1

1. Introduction

- 1.1.1. This response to the Examining Authority's first round of written questions and requests for further information (ExQ1) is submitted by LHR Airports Limited and Heathrow Airport Limited. LHR Airports Limited and Heathrow Airport Limited are group companies of Heathrow Airport Holdings Limited. For the purposes of their participation in the examination into the Development Consent Order (DCO) application for the Gatwick Airport Northern Runway Project (NRP), and this response specifically, both companies are treated as a single interested party and referred to as 'Heathrow'.
- 1.1.2. ExQ1 reference CE.1.1 is directed to Heathrow (amongst other parties). It concerns the assessment of cumulative effects in the Environmental Statement (ES) for the Gatwick NRP and asks: *"Does the ES Chapter 20 Cumulative Effects [APP-045] fully account for the cumulative effects of the Proposed Development and the delivery of a third runway at Heathrow Airport?"* Heathrow's response to CE.1.1 is set out below.

2. Heathrow Response

- 2.1.1. The Planning Inspectorate's (PINS) Scoping Opinion (October 2019), provided on behalf of the Secretary of State, requested that the ES for the Gatwick NRP includes an assessment of the cumulative effects of the scheme with the expansion of Heathrow Airport. At Section 4.15 (id 4.15.2) of the Scoping Opinion, PINS stated:

"The Inspectorate notes the Applicant's references to the relevance of Heathrow in terms of predicted future changes in passenger and cargo movements at the Proposed Development (eg section 4.5 of the Scoping Report). The implications of Heathrow's expansion should be fully identified and explored in terms of potential for significant cumulative effects across relevant aspect chapters.

Although the project at Heathrow is outside of the 15km 'Zone of Influence' (as defined in table 7.15.3), the Inspectorate considers that an increase in night flights associated with the Proposed Development (combined with Heathrow expansion and any airspace change) could impact residential amenity (and other aspects) of communities and other receptors adjacent to Gatwick Airport. The Inspectorate also expects there will be a degree of overlap in the strategic level transport modelling for both projects which will also need to be addressed within the ES.

The Inspectorate also considers, based on the information presented in Section 5.3 of the Scoping Report, that there could be a temporal and spatial overlap between construction phases at both airports which could result in cumulative increases in HGV movements on the strategic road network and knock on effects to noise and air quality.

The Inspectorate expects the consideration of cumulative effects between the Proposed Development and Heathrow expansion to include consideration of the construction as well as operational phases.”

- 2.1.2. Heathrow notes that the Heathrow North West Runway (NWR) scheme has not been included in the main cumulative effects assessment presented in Chapter 20 of the ES. Gatwick states at paragraph 20.7.3 of the ES that the omission of the NWR scheme from the cumulative effects assessment is due to uncertainty relating to the timeframes for delivery of a third runway at Heathrow and lack of sufficient information. Instead, a separate qualitative sensitivity test has been conducted.
- 2.1.3. As set out in our written representation (dated 12 March 2024), the Airports National Policy Statement (ANPS) is clear that there is a need for one new runway in the South East of England to maintain the UK's hub status, and that this need is most appropriately and effectively met by the Heathrow NWR scheme. Consistent with this policy, Heathrow Airport intends to grow sustainably as the demand for aviation recovers, and expansion continues to form part of this strategy. In this context, Heathrow would expect to see a robust assessment of the cumulative effects of the Gatwick NRP and Heathrow NWR scheme in the ES.
- 2.1.4. In our written representation, we noted that, in order for proposals to be consistent with national aviation policy set out in the ANPS, any schemes brought forward under the Government's making best use policy must complement and not threaten the future delivery of additional hub capacity at Heathrow through the NWR scheme. Gatwick must therefore demonstrate through its DCO application that:
- the aviation demand to be served at Gatwick with the Gatwick NRP will be additional to, or different from, the additional hub capacity to be delivered by the Heathrow NWR scheme; and
 - the Gatwick NRP is complementary to, but will not threaten, the achievement of the core policy objective of maintaining the UK's global hub status through the provision of the Heathrow NWR scheme.
- 2.1.5. In this context, a robust assessment of the cumulative effects of the Gatwick NRP with the Heathrow NWR scheme should inform the consideration by the ExA of whether the policy tests outlined above are met.