



Gatwick Airport Northern Runway Project

The Applicant's Response to Written Representations
Appendix E – Letters of Support from Tourism Operators
and Organisations

Book 10

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22 March 2024

Dear Sir / Madam

R.E. Gatwick Airport's Development Consent Order

As the CEO of the UK's inbound tourism association, I write in support of the proposals to bring Gatwick Airport's northern runway into routine use.

Inbound (international) tourism to the UK is forecast to be worth £34.1 billion to our economy in 2024 and is the country's 2nd largest service export industry, worth more in exports than medicinal and pharmaceutical products. Gatwick Airport plays a vital role in this industry delivering many of these vital visitors to the UK, and drives significant revenue into the whole of the UK.

Ease of access to a destination is key and any endeavours to grow the airport will result in better ability for potential customers to visit and a reduction in barriers not to. Alongside the expansion, additional routes will open up exciting new destinations. With expanded capacity, there is the potential for new routes, including from high value markets such as North America, the Far East and the Middle East.

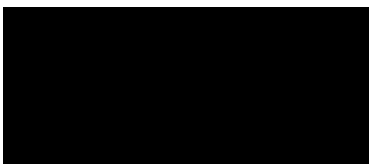
Not only will the additional capacity be of benefit to tourism, but it has been proven that there are strong links between people visiting a destination and then considering it for inward investment and trade.

International consumers are increasingly looking at travel with a purpose. Gatwick Airport's commitment to achieving net zero for its Scope 1 and 2 greenhouse gas emissions by 2030, and sourcing 50% of its network electricity and 50% of its heat network from UK renewable sources by 2030, all as part of its second Decade of Change to 2030 sustainability plan, will build on the considerable success thus far.

It is to the immense credit to Gatwick Airport that passenger and visitor numbers are returning to pre-pandemic levels. As we approach the future with optimism its vitally important that our industry continues to grow, allowing it to be an even larger driver of our economy. Bringing Gatwick Airport's northern runway into routine use, would be an asset to the UK's inbound tourism industry, driving growth and jobs in the South East and the UK as a whole.

UKinbound fully supports the expansion proposals.

Yours sincerely,



Joss Croft OBE
Chief Executive

UKinbound, 47 Brunswick Ct, Tanner St, London SE1 3LH



Website: 

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Company registration no.: 06460272

11th March 2024

Dear Stephanie,

It is encouraging to hear you are submitting a planning application to change the conditions of use of the Northern Runway, from its main purpose of a taxiway and secondary use as a runway, when the Main Runway is out of use, to a designated runway allowing dual runway operations. We at **Jet2.com** are supportive of this development, to bring much needed new runway capacity to the South East of England, in an economic and efficient manner.

As you know we have successfully operated charter flights during the last three winter seasons, and would like to bring our **Jet2.com** scheduled services, and **Jet2holidays** packages to Gatwick to serve the local catchment area and compliment our eleven other UK bases. We know customer demand for our products are high, and the introduction of our services would increase competition and connectivity from Gatwick Airport.

Gatwick has consistently held the position of being the busiest single runway operation in Europe, and in the summer, is running at full capacity. Due to this reason, we have therefore not made any application for Summer 2024 slots, as we know that even if a minimal number of slots is awarded, the timings and uncertainty of scheduling would make an operation ineffective given our model, which requires a minimum of two rotations per day. The UK Government as part of its recent Consultation on Slots (dated December 2023) has stated that “the Prime Minister has been clear that one of his priorities is to grow the economy”, and it is equally clear that failure to develop additional airport capacity in the South-East of England will hinder on the ability to deliver on this objective.

The proposal to develop an existing “relief” runway into one that can be regularly used in conjunction with the current Main Runway, offers the most sensible solution to develop capacity at the various London Airports, and would offer the faster and most efficient means to do so. Gatwick is in a largely rural location; therefore, the impact of noise and other environmental factors will have far less impact than the alternative options, e.g. a third runway at London Heathrow Airport.

You will be aware **Jet2.com**, recently placed a very large order for 146 of Airbus A321neo aircraft, the most environmentally and fuel-efficient aircraft currently available for short-haul services. Not only does this aircraft significantly reduce emissions, but it is extremely quiet and can uplift 232 passengers on one flight making the best use of valuable runway slots.

We will therefore follow your application closely, as use of the Northern runway would provide valuable additional capacity for narrow-body aircraft, as well as reducing delays by avoiding aircraft having to hold for long periods whilst waiting to land or departing. This will deliver immediate environmental benefits, and our new quiet and environmentally efficient A321neo aircraft would therefore be ideal for any new capacity.

We whole-heartedly support this development plan and trust that the planning process will move forward in an efficient manner.

Your sincerely,



Ian Doubtfire
Sustainability and Business Development Director



The Planning Inspectorate
National Infrastructure Applications Team
Temple Quay House
Temple Quay
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BS1 6PN

12 March 2024

Subject: Application for a Development Consent Order by Gatwick Airport Limited for the Gatwick Airport Northern Runway Project (Ref. TR020005)

To Whom It May Concern

I write to you on behalf of the Wizz Air Group, an interested party in relation to the application for development consent for the Gatwick Airport Northern Runway Project. At the outset, Wizz Air asserts its support of Gatwick Airport Limited ("the Applicant") in its application to make infrastructure changes to the Northern Runway at London Gatwick Airport ("LGW").

Wizz Air

Wizz Air is an ultra-low-cost carrier airline group, which has firmly established itself as a market leader in offering low-cost air travel. This year marks the 20th anniversary of the Group, which is one of the fastest growing airline Group's and is the most sustainable airline Group globally, as recognised by independent third parties.

Wizz Air is listed on the London Stock Exchange and comprises four airlines, namely, Wizz Air UK, Wizz Air Hungary, Wizz Air Malta, and Wizz Air Abu Dhabi. Wizz Air UK is headquartered in London (Luton Airport) and has two bases in Luton (LTN) and LGW flying to more than 70 destinations. Wizz Air's largest base is in Luton today, with 12 based aircraft serving 58 routes to 60 destinations in 28 countries. Wizz Air opened a second base at LGW in 2020 with five based aircraft plus additional inbound flying from the group. From LGW, Wizz Air serves 26 routes to 26 destinations in Europe, North Africa, and the Middle East. Wizz Air has made strategic investments in LGW by acquiring slots, allocating aircraft, and consistently expanding our route network. Our plans include further expansion and growth of the aircraft base, with the potential introduction of the Airbus XLR aircraft. As a result, we play a crucial role as stakeholders in the Applicant's process. Our future growth depends on necessary infrastructure changes at the airport.

Growth Plans

Wizz Air has a significant order book with Airbus with a backlog of around 340 aircraft, including 47 A321XLRs. We have a growth plan of 500 aircraft by 2030. Our order book underpins the Group's planned growth for several years ahead.

Wizz Air has ambitious growth plans for the UK, in particular London. Today, Wizz Air holds just above 5% market share in London but sees further opportunity for growth. The market today is constrained by the lack of available capacity in any of the primary airports. Wizz Air sees an opportunity to invest between 50-60 total aircraft into London by 2030, 2.5 times the size of Wizz Air today in London. Unfortunately, due to capacity constraints in London, the current growth expectation is only 18% by 2026, significantly lagging behind market and



consumer demand. If the infrastructure development is approved, Wizz Air is ready to invest 50 additional aircraft in LGW.

Further, as part of this growth, we will start receiving XLR aircraft in 2025 and have assessed London as a potential launch market. The XLR is a gamechanger in terms of range and efficiency and boasts an unprecedented range for a single-aisle aircraft, reaching up to 4,700 nautical miles (8,700 kilometres). LGW is one of the primary airports under consideration. If the XLR aircraft are based in LGW this would pave the way for a groundbreaking opportunity, unlocking access to the long-haul low-cost market. The deployment of XLR aircraft could catalyze competitive pricing strategies, new passenger growth and the development of new innovative routes. The XLR could boost the demand for cost-effective travel to the Middle East, Indian Subcontinent, and Africa for both UK residents and visitors looking to visit the UK.

If the XLR was based in LGW, these additional routes would further solidify LGW's position as a key player in the international aviation market. The potential to connect these diverse places directly to LGW could improve the travel industry, offering passengers more options and flexibility for their travel plans.

In order to unlock this future growth, it's essential that LGW has additional facilities to support passenger growth and enhance throughput. It's imperative for the airport infrastructure to undergo strategic enhancements. The primary limitation today is the runway capacity, but there is further work needed such as the proposed extension of the North Terminal to ensure efficient flow of travellers and enhanced services. By proactively addressing these areas, the airport can not only accommodate the projected growing demand but also deliver a superior travel experience that meets future needs.

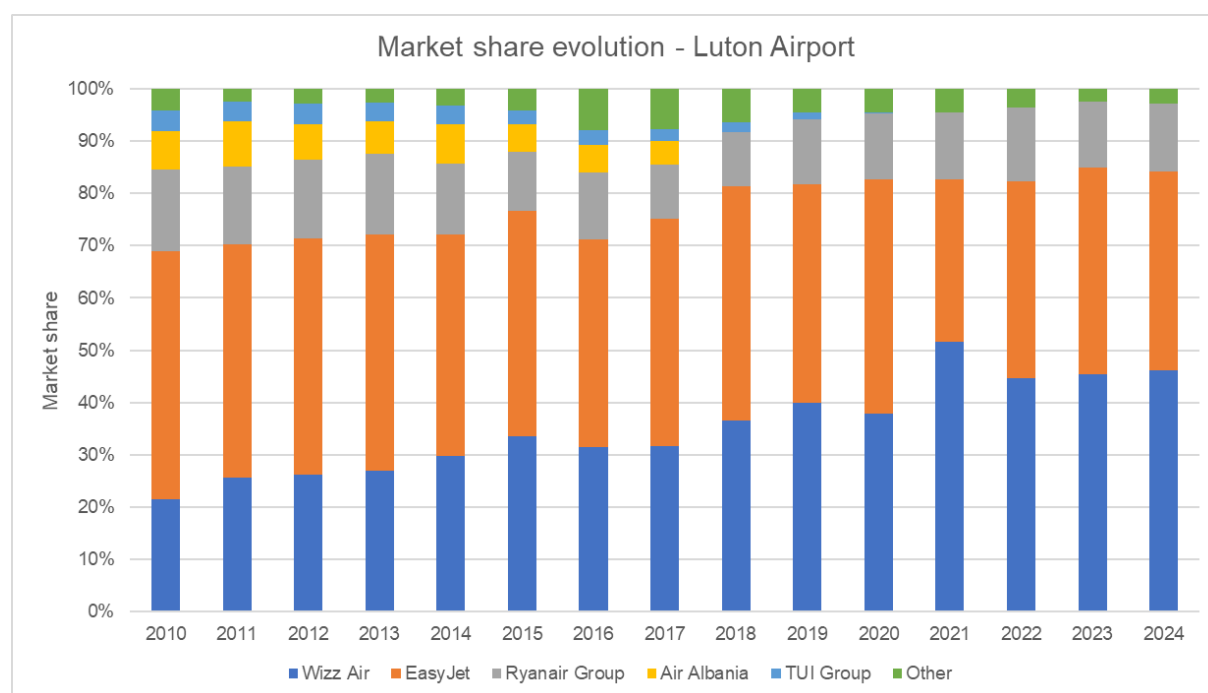
The expansion of our LGW base, supported by the external case study findings, is expected to substantially impact local and regional economies¹. As an example, if able to introduce 50 new aircraft to LGW, these planes would directly create approximately 1,000 jobs at the airport, with an additional 2,500 jobs in related sectors due to increased demand for services and goods. This is in line with aviation industry benchmarks, where every one million passengers generate about 900 jobs. By extrapolating, the LGW expansion, which could increase passenger numbers significantly, translates to a notable uptick in employment density and economic activity. The project mirrors the success seen in similar expansions, where Wizz Air's growth has driven regional economic development. This not only underscores the direct benefits in terms of job creation but also the broader positive implications for infrastructure, local businesses, and overall economic health.

With the opportunity to expand at LGW, Wizz Air would be able to bring new markets. First, Wizz Air would create new links to core markets in Central and Western Europe, such as Italy, Poland, Romania, and the Balkans. Further, new service would be added to consumer's most popular markets, such as Spain, Portugal, France, Germany, Scandinavia, and Switzerland. "Near Africa" destinations such as Tunisia, Algeria, Morocco, and Egypt would be added and/or scaled to create more network diversity. Finally, with the XLR aircraft, Wizz Air would be able to potentially connect new unserved/underserved regions such as the Arabian Peninsula (e.g. UAE, Saudi Arabia, Kuwait, and Oman), West Africa (e.g. Nigeria, Ghana, Senegal), Central Africa, the Indian Subcontinent, Pakistan, and the Caribbean. Most importantly, with the growth of both based and inbound flying, Wizz Air would be able to bring more low fare travel to customers in the London area. Wizz Air has been shown to lower fares by 50+% in markets where it enters, giving more choice to consumers.

¹ Dusek, T., & Lukovics, M. (2022). The impact of a low-cost airline's flights on local economy – On the example of Cluj-Napoca International Airport (Romania). *Regional Statistics*, 12(4), 132-151. doi:10.15196/RS120406



Wizz Air's strategic focus and operational commitment have been well demonstrated by our dynamic growth trajectory, becoming the leading carrier at London Luton Airport **(1)**. This growth demonstrated in LTN is a clear indication of our focus on delivering what the market and what passengers want – more service to new destinations at low fares. Wizz Air aims to build on our current footprint to further grow in LGW, replicating our LTN success by enhancing network density and increasing flight frequencies. This expansion is aligned with our long-term vision for the UK market, underscoring our commitment to driving connectivity, supporting local economies, and offering competitive low-fare travel options.



(1) Wizz Air market share - LTN

To match the ambitious plans for passenger growth, the efficiency of the airport needs to be improved to allow increased airport passenger numbers and aircraft operations.

Market & Slot Constraints

The expansion plans at LGW have become crucial due to the current circumstances. Both London Luton and London Gatwick are facing a lack of available slots. This shortage restricts the ability to expand services and meet the growing passenger demand. Therefore, approving the expansion at LGW is of utmost importance to address these issues.

In addition, London Gatwick is a capacity constrained airport, and an expansion of capacity would support future resilience as well as new route development and increased frequency on existing routes. Capacity at LGW is scarce which leads to inefficiency as demand for slots at LGW outstrips supply. The Department for Transport in its Consultation Impact Assessment for Airport Slot Reform outlined that slots at LGW pre pandemic were over-subscribed in almost all hours of operation, particularly in Summer, and that the constraints are significant again following on from the recovery of aviation demand. As the availability of slots is directly connected to the capacity of an airport, a slot is therefore a scarce resource.

In S24, easyJet had a high concentration of slots at LGW, with almost 43% of the slot capacity. Comparatively, Wizz Air only has 6%, An increase in slot share would lead to increased competition, which would lead to increased efficiency and improved customer service and



lower fares. In 2021 Wizz Air invested significantly in LGW through the acquisition of a substantial portfolio of slots from Norwegian Air Shuttle. This enabled us to enhance our presence and competitive position in the London market. However, due to the ongoing capacity constraints, in particular related to scarcity of slots at the airport, we are unable to expand further.

Expansion at the airport could address the scarce slot capacity and allow further distribution of slots. An airline such as Wizz Air could benefit from the ability to deliver economies of scale with further slots to support and enhance connectivity for passengers. There are numerous economic benefits to increased connectivity, including increased labour productivity and increased GDP.

The Importance of Dual Runways at LGW

Limiting London Gatwick Airport to the use of a single runway constrains its growth and resilience. The Applicant suggests modifying the Northern runway by adjusting the centerline and removing the planning condition that restricts its use, thereby enabling simultaneous operations on both runways. This modification is expected to enhance the airport's efficiency and increase passenger numbers and aircraft operations, in line with LGW's ambitious expansion goals. Moreover, these expansion plans are designed with minimal environmental impact and within existing airport boundaries to meet projected future demand—up to 75 million passengers annually by the late 2030s. Implementing dual runway operations would increase slot capacity, thereby boosting the airport's efficiency and fostering greater competition among airlines and benefiting customers. It is crucial to manage LGW's scarce resources with a vision for expansion, particularly by adding runway capacity. Without addressing this scarcity, market entry could become significantly restricted.

Environmental Performance

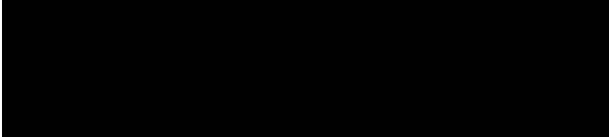
Wizz Air operates the youngest and most carbon-efficient fleet in Europe, with a clear focus on fuel efficiency. As a result, the airline has become a leader in terms of carbon emissions intensity reduction, with the lowest carbon emissions per passenger kilometre (CO₂/RPK) compared to our peers in the sector, currently 52 grams CO₂/RPK.

Wizz Air UK today operates with a full A321neo fleet, and Wizz Air intends to use this aircraft for future growth at LGW. The Airbus A321neo is the most efficient single-aisle aircraft with the lowest fuel consumption per seat kilometre in its category. The new generation Airbus A321neo aircraft is powered by two Pratt & Whitney geared turbofan engines and features the widest single-aisle cabin with 239 seats in a single class configuration. The A321neo delivers exceptional fuel economies by reducing fuel consumption by 10 per cent compared to the A321ceo. The engines, together with Airbus' fuel-saving Sharklet™ wingtip devices, which enables per-seat fuel improvements of 20%. In addition to its environmental benefits, the A321 NEO aircraft is also distinguished by its noise efficiency. It guarantees 50% reduction in noise footprint versus the previous A321 aircraft (A321ceo) - when compared to larger or older generation aircraft the noise reduction is even more significant. This not only contributes to the overall quality of life in areas near airports and flight paths but also underscores Wizz Air's commitment to minimizing its environmental impact. This significant reduction in noise pollution contributes to the overall quality of life in areas near airports and flight paths. In light of the environmental considerations in the planning process, the introduction of fuel and noise efficient aircraft will act as considerable mitigation measures when considering traffic, noise, and greenhouse gas emissions. This strategic investment underscores Wizz Air's commitment to environmental sustainability and its leadership role in the industry.



In conclusion, Wizz Air sees a market today in London and LGW which is underserved, and where airfares will only rise without new capacity coming online. If approved, Wizz Air would look to bring 50 A321neo aircraft to grow its LGW position, with the increased capacity bringing substantial benefits to LGW, including more choices in destinations for consumers, more environmentally sustainable travel options, lower fares, and new job creation. Given the existing capacity limitations, the most effective approach to address inefficiencies and foster competition is through efficient long-term infrastructure enhancements. Therefore, Wizz Air fully supports the Applicant in the process.

Best regards,



Robert Carey
President
Wizz Air Group