



# Gatwick Airport Northern Runway Project

## The Applicant's Response to Written Representations Appendix A – Policy Response

### Book 10

VERSION: 1.0

DATE: APRIL 2024

Application Document Ref: 10.14

PINS Reference Number: TR020005

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## 1 Introduction

- 1.1.1 The Written Representations of the Joint Local Authorities say very little about national aviation policy. The Written Representations rely substantially on the Local Impact Reports (LIRs) but the LIRs also contain little analysis of national policy for aviation, apart from identifying the dates and titles of the documents.<sup>1</sup>
- 1.1.2 That is a partial approach – national aviation policy is the starting point for any decision in this case and any balanced analysis should recognise the importance which it attaches to aviation in the national interest and the weight which it attaches to meeting the need for international connectivity.
- 1.1.3 The Applicant considers that a full understanding and recognition of national policy is necessary.
- 1.1.4 National aviation policy is reviewed in detail in the **Planning Statement** [APP-245], particularly in Sections 3 (Need), 6 (Policy) and 8 (the principle of development and MBU). Policy relating to need is also addressed in the **Needs Case** [APP-250], particularly Section 3.
- 1.1.5 Whilst there is a broad range of policy, much of which has some importance and relevance, it is national policy rather than local policy (and national aviation policy in particular) which provides the principal policy framework for the application. In brief this is because, as the **Planning Statement** [APP-245] explains:

*“6.1.4 National aviation policy provides the primary policy framework for the determination of aviation NSIPs. The National Planning Policy Framework (NPPF) confirms (at paragraph 5) that it does not provide policies for NSIPs and local plans prepared in accordance with the NPPF do not do so either. As the Government policy document Beyond the Horizon - The Future of UK Aviation – making best use of existing runways, (June 2018) explains from paragraph 1.11, local authorities have an important role to play in local issues but “there are, however, some important environmental elements which should be considered at a national level.”<sup>2</sup>*

*6.1.5 Seen in that context, it is appropriate to record that the Crawley Local Plan, 2015 “has been prepared on the basis of supporting the growth of Gatwick Airport to a throughput of 45 million passengers per annum within its current configuration of a single runway and two terminals” (paragraph 1.37) and*

<sup>1</sup> The LIRs do contain what GAL considers to be a selective focus on part of paragraph 1.42 of the Airports National Policy Statement but make little further reference to national policy.

<sup>2</sup> Beyond the Horizon at that point refers particularly to policies for air quality, noise and carbon.



*recognises that any decision about the significant growth of the airport (such as a second runway) would be a matter for government policy (paragraphs 1.38 and 9.5). Local planning policies should be seen in this context.”*

- 1.1.6 There are two applicable National Policy Statements: the Airports NPS 2018 and the National Networks NPS 2014, which has effect for the main highway works. Of these, it is the Airports NPS which provides the primary policy because the purpose of the application is the expansion of aviation activity at Gatwick Airport, and the highway elements are secondary to that. (See the **Planning Statement [APP-245]** paragraphs 6.1.6 and 6.3).
- 1.1.7 For the purposes of this response, there are five aspects of national aviation policy which the Applicant considers it important to highlight. These show that:
- i. policy has consistently confirmed the importance of aviation to the UK,
  - ii. the Government is committed to supporting aviation growth to meet forecast demand,
  - iii. importance is attached to an efficient and resilient aviation industry,
  - iv. Gatwick qualifies for government policy support; and
  - v. the strength of policy support is not diminished by or inconsistent with the Government’s commitment to Net Zero.
- 1.1.8 Before reviewing these five propositions, it is appropriate to start with the ANPS, and its application in this case.

1.1.9 Emphasis has been added to the text of polices.

## 1.2 The ANPS

1.2.1 The ANPS is very clear about its status in this case. The ANPS remains up to date government policy.<sup>3 4</sup>

1.2.2 The ANPS does not “have effect” for the NRP or for any other development apart from that specifically described in paragraphs 1.15 and 1.40 (a specific North-West runway at Heathrow). Nevertheless, the ANPS tells us explicitly that it provides government policy on the need for new runway capacity in the South-East (para. 1.13) and that:

*“1.14 It sets out planning policy in relation to applications for any airport nationally significant infrastructure project in the South East of England,*

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<sup>3</sup> “The Government’s existing policy framework for airport planning in England – the Airports National Policy Statement (ANPS) and *Beyond the horizon, the future of UK aviation: Making best use of existing runways (MBU)* – have full effect, as a material consideration in decision making on applications for planning permission.” (Jet Zero Strategy 2022 p.74)

<sup>4</sup> “The ANPS does not affect government policy on wider aviation issues, for which the 2013 Aviation Policy Framework and any subsequent statements still apply.” (ANPS paragraph 1.38)

*and its policies will be important and relevant for the examination by the Examining Authority, and decisions by the Secretary of State, in relation to such applications.”*

*“1.41 The Airports NPS does not have effect in relation to an application for development consent for an airport development not comprised in an application relating to the Heathrow Northwest Runway... Nevertheless, the Secretary of State considers that the contents of the Airports NPS will be both important and relevant considerations in the determination of such an application, particularly where it relates to London or the South East of England.”*

1.2.3 Many of its precise terms are specific to Heathrow and para. 1.13 explains that the ANPS sets out *“particular considerations relevant to a development consent application to which the Airports NPS relates.”* In relation to the need for new capacity generally in the South East, however, the ANPS sets out government policy.

1.2.4 Having settled that it is Heathrow where the new runway should be developed,<sup>5</sup> the ANPS established that the Government nevertheless supports increased capacity at other airports.

1.2.5 Most directly, paras. 1.39 and 1.42 provide:

*“1.39...the Government has confirmed that it is supportive of airports beyond Heathrow making best use of their existing runways.” That policy clearly applies to Gatwick.*

*“1.42...As indicated in paragraph 1.39 above, airports wishing to make more intensive use of existing runways will still need to submit an application for planning permission or development consent to the relevant authority, which should be judged on the application’s individual merits. However, in light of the findings of the Airports Commission on the need for more intensive use of existing infrastructure as described at paragraph 1.6 above, the Government accepts that it may well be possible for existing airports to demonstrate sufficient need for their proposals, additional to (or different from) the need which is met by the provision of a Northwest Runway at Heathrow.”*

1.2.6 Therefore, whilst the ANPS settled government policy for the development of a new runway (at Heathrow), it states in terms that there is additionally a need for

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<sup>5</sup> ANPS paragraph 1.10. The Government’s decision was announced in October 2016.

other airports to make best use of their existing runways and more intensive use of their infrastructure. Accordingly, to support such applications, the ANPS states that ***“it may well be possible for existing airports to demonstrate sufficient need for their proposals.”***

- 1.2.7 This text has been relied upon by the JLAs and Interested Parties to suggest that the ANPS provides a test or precondition for the expansion of Gatwick: that it can only make best use of its runways if it is doing so in a way which adds to or is different from the need that would be met at Heathrow by a North West runway. GAL has responded to that interpretation in **The Applicant’s Response to Heathrow Airport Limited Written Representation – Appendix C** [Doc Ref. 10.14] and **The Applicant’s Response to CAGNE Written Representation – Appendix B** [Doc Ref. 10.14] and in **The Applicant’s Response to the West Sussex Authorities Local Impact Report – Appendix B** [Doc Ref. 10.15]. Also at Deadline 3 GAL, has addressed this issue in it’s the **Applicant’s Response to Deadline 2 Submissions** [Doc Ref. 10.17]. The matter is also addressed in response to **ExQ1 CS.1.20** [Doc Ref. 10.16]. The matter is also addressed further below.
- 1.2.8 In the Applicant’s view it follows that the NRP is in principle consistent with and supported by the ANPS because the policy support is clear in ANPS paragraph 1.39 and because it responds to a need identified in the ANPS and would make better use of Gatwick’s existing runways and more intensive use of Gatwick’s infrastructure.
- 1.2.9 Notably, the Airports Commission and the ANPS concluded that a new runway in the South East would be needed by 2030 and assumed the construction of the North West runway at Heathrow by that time.<sup>6</sup> It follows that the need for other airports to make best use has increased even beyond that assumed in the ANPS.<sup>7 8 9</sup>
- 1.3 **Whether a need is required to be demonstrated**
- 1.3.1 A number of Written Representations assert that the Applicant must show a need for the NRP, based on their reading of paragraph 1.42 of the NPS.

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<sup>6</sup> ANPS paragraphs 1.21, 2.32. At paragraph 3.46 it is recorded that Heathrow stated its new runway was capable of delivery by 2026.

<sup>7</sup> “16.40 Irrespective of how the government responds to the recommendations set out in in this report a new runway might not open for at least 10 years. **It is imperative that the UK continues to grow its domestic and international connectivity in this period,.....**” (Airports Commission Final Report)

<sup>8</sup> Demand was 9% higher in London in 2016 than the Airports Commission forecast. (Beyond the Horizon paragraph 1.4).

<sup>9</sup> As the Secretary of State made clear through his decision at Manston (in paragraphs 97 to 102), it also cannot be assumed that a new runway will come forward at Heathrow.

1.3.2 The case for the NRP is unusual compared with that promoted recently for instance at Luton, Stansted or Manston in that the application does not simply rely on a need becoming apparent through projections of future growth. At Gatwick the submitted **Needs Case** [APP-250] demonstrates a need now based on two compelling propositions, either one of which is sufficient to demonstrate a need, should a need have to be proven:

- a need now based on documented evidence of excess current demand which cannot be accommodated; and
- an operation need now for the use of the northern runway to bring day to day resilience to an airport which has the busiest daytime single runway in the world.

1.3.3 The second of these at least appears to be accepted by the JLAs:

*“The Authorities recognise that having a second runway available for use by departing aircraft at peak times would improve the resilience of the Gatwick operation in terms of minimising and mitigating the substantial levels of delay experienced by aircraft at the high levels of single runway usage experienced pre-pandemic as set out in Section 7.2 of the Needs Case (APP-250).”* (Sussex LIR paragraph 6.13)

1.3.4 The question of whether a need has to be demonstrated, therefore, is an academic one.

1.3.5 In fact, there is no policy or legal requirement for the Applicant to show a need for the NRP.

1.3.6 Paragraph 1.42 of the ANPS is helpful in recognising that it may well be possible for a need to be demonstrated, but it does not require such a demonstration. Instead, the same paragraph repeats paragraph 1.39 in confirming that any application will be judged on its merits. No doubt the demonstration of need would add to the benefits and merit of an application, but it is not a requirement. In policy terms, paragraph 1.39 is clear that the ANPS is supportive of airports beyond Heathrow making best use of their existing runways, without preconditions.<sup>10</sup>

1.3.7 Indeed, the ANPS is written in the knowledge of government forecasts and the work of the Airports Commission that a new runway at Heathrow would not meet the totality of the need and that any new runway will inevitably take time to

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<sup>10</sup> Beyond the Horizon at paragraph 1.27 confirms that DCO applications to make best use would be considered on a case by case basis by the Secretary of State.

develop so that there is in any event a clear need for more airport capacity in the interim period.

1.3.8 As the Applicant will explain, the NRP will meet some similar but many different needs from those which would be met by a new runway at Heathrow – and that it would meet needs much sooner. It is not the Applicant’s case that the NRP replaces the important need for expansion of the UK’s hub airport. Both projects (and the expansion of capacity at other airports) are necessary to achieve government policy objectives for UK aviation.

1.3.9 Subsequent Planning Inspector and Secretary of State decisions assist in understanding this point.

*“17. ...There is **no requirement flowing from national aviation policy for individual planning applications for development at MBU airports, such as Stansted, to demonstrate need for their proposed development** or for associated additional flights and passenger movements.” (Stansted decision letter May 2021 paragraph 17)*

*“37 ...He also agrees that the MBU policy, which is relevant to this Application, **does not require making best use developments to demonstrate a need for their proposals** to intensify use of an existing runway or for any associated Air Traffic Movements (“ATMs”). ...The Secretary of State considers that the benefits expected from a proposed development would materialise if there is a need for that development.” (Manston decision letter August 2022 paragraph 37)*

1.3.10 Against that background, five main principles drawn from national aviation policy are set out below.



## 2 The Importance of Aviation

2.1.1 There are multiple statements in current national policy which testify to the importance of the aviation industry.

2.1.2 These include the ANPS itself at paragraph 1.1 and paragraphs 2.1 to 2.9. For example:

***“2.4 The UK has the third largest aviation network in the world after the USA and China, and London’s airports serve more routes than any other European city. The UK’s airports handled over 268 million passengers in 2016, a 6.7% increase from the previous year. The sector benefits the UK economy through its direct contribution to GDP and employment, and by facilitating trade and investment, manufacturing supply chains, skills development, and tourism.*”**

***2.5 In 2014 the UK aviation sector generated around £20 billion of economic output, and directly employed around 230,000 workers, supporting many more jobs indirectly. The UK has the second largest aircraft manufacturing industry in the world after the USA, and will benefit economically from growth in employment and exports from future aviation growth. Air Passenger Duty remains an important contributor to Government revenue, raising over £3 billion in 2015/16. Heathrow Airport directly supports around 75,000 jobs on site.***

***2.8 Aviation also brings many wider benefits to society and individuals, including travel for leisure and visiting family and friends. This drives further economic activity. In 2013, for example, the direct gross value added of the tourism sector, one of the important beneficiaries of a strong UK aviation sector, was £59 billion. Likewise, 2015 saw the value of inbound tourism rise to over £22 billion, with the wider UK tourism industry forecast to grow significantly over the coming decades.***

***2.9 The importance of aviation to the UK economy, and in particular the UK’s hub status, has only increased following the country’s decision to leave the European Union. As the UK develops its new trading relationships with the rest of the world, it will be essential that increased airport capacity is delivered, in particular to support development of long haul routes to and from the UK, especially to emerging and developing economies.”***

2.1.3 Similar statements can be found in the Aviation Planning Framework 2013 (the APF) (cited in the **Needs Case** [\[APP-250\]](#) at Section 3.2); Beyond the Horizon

2018 (see **Needs Case** [[APP-250](#)] at Section 3.4); and Aviation 2050 2018 (Section 3.5), which states;

**“Aviation has long been at the heart of the United Kingdom’s economic success. From its earliest days, flight has helped forge international trade links and created vital domestic connections enabling our country to flourish. Today we have the largest aviation network in Europe and the third largest in the world, an industry that contributes at least £22 billion to the UK economy, along with over 230,000 jobs.”**

2.1.3 The same message is clear in Flightpath to the Future 2022 (Section 3.6).

2.1.4 That message is also apparent in recent policy statements related to the UK’s carbon commitments. Whilst aviation might be seen to be a challenge to those commitments, the policy documents are clear:

**“International connectivity is a vital part of Global Britain, and everyone should continue to have access to affordable flights, allowing them to go on holiday, visit family, and do business. But as the aviation sector recovers, a process likely to take several years, it must do so in a lower carbon way.”** (Transport Decarbonisation Plan 2021, Foreword from the Secretary of State) <sup>11</sup>

**“Meeting this challenge is vital for UK connectivity and growth. The Government recognises the aviation sector’s role in making us one of the world’s best-connected and most successful trading nations. We are committed to enabling the recovery of the sector to support our levelling up agenda through regional connectivity and to strengthen ties within the Union, as well our connectivity globally. We need solutions that reduce the sector’s emissions whilst delivering economic benefits across the UK.”** (Jet Zero Strategy 2022, Executive Summary, page 7)

2.1.5 Few if any sectors of the economy benefit from such strong, consistent policy support.

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<sup>11</sup> In his decision letter on Manston Airport, the Secretary of State confirmed that: *“One of Government’s main objectives is to ensure that aviation continues to make the UK one of the best connected countries in the world, and included in this is increasing links to emerging markets so that the UK can compete successfully for economic growth opportunities (APF executive summary, paragraph 9)”*. (Decision letter paragraph 48)

### 3 Policy Supports Growth

- 3.1.1 In the most recent statement of national aviation policy, Flightpath to the Future, the policy approach is clear:

*“**The Government is committed to growth.** We will work closely with industry to continually assess how we can best support sustainable recovery and a bright future for UK aviation.” (p.19)*

*“Airports are part of the UK’s thriving and competitive aviation sector and **play a critical role in boosting both global and domestic connectivity and levelling up in the UK. Airport expansion also plays a key role in this and the Government remains supportive of airport expansion where it can be delivered within our environmental obligations.**” (p.26)*

- 3.1.2 Similarly, the ANPS is clear that airports in the South East face serious capacity challenges and that failing to meet demand would be damaging for the UK:

*“2.11 The UK now faces a significant capacity challenge. Heathrow Airport is currently the busiest two-runway airport in the world, while Gatwick Airport is the busiest single runway airport in the world. **London’s airports are filling up fast, and will all be full by the mid-2030s if we do not take action now.***

*2.12 Aviation **demand is likely to increase significantly between now and 2050.** All major airports in the South East of England are expected to be full by the mid-2030s, with **four out of five full by the mid-2020s.** By 2050 demand at these airports is expected to outstrip capacity by at least 34%, even on the department’s low demand forecast. There is relatively little scope to redistribute demand away from the region to less heavily utilised capacity elsewhere in the country.”*

*“2.14 **The consequences of not increasing airport capacity in the South East of England – the ‘do nothing’ or ‘do minimum scenarios’ – are detrimental to the UK economy and the UK’s hub status.** International connectivity will be restricted as capacity restrictions mean airlines prioritise their routes, seeking to maximise their profits. Capacity constraints therefore lead to trade-offs in destinations, and while there is scope to respond to changing demand patterns, this necessarily comes*

*at the expense of other connections. Domestic connectivity into the largest London airports will also decline as competition for slots encourages airlines to prioritise more profitable routes.”*

- 3.1.3 For the avoidance of doubt, the Applicant is not suggesting that the strength of these policies means that the detail of the benefits and impacts of its application do not need to be scrutinised – but the strength of policy support is clearly material in weighing that balance.

## 4 An efficient and resilient aviation industry is important to the UK

- 4.1.1 Again, the ANPS puts the position very clearly:

*“2.10 However, challenges exist in the UK’s aviation sector, stemming in particular from capacity constraints. **These constraints are affecting our ability to travel conveniently and to a broader range of destinations than in the past. They create negative impacts on the UK through increased risk of flight delays and unreliability, restricted scope for competition and lower fares, declining domestic connectivity, erosion of the UK’s hub status relative to foreign competitors, and constraining the scope of the aviation sector to deliver wider economic benefits.***

*2.15 Operating existing capacity at its limits means there will be little resilience to unforeseen disruptions, leading to delays. Fares are likely to rise as demand outstrips supply, and the lack of available slots makes it more difficult for new competitors to enter the market.*

*2.16 The Government believes that **not increasing capacity will impose costs on passengers and on the wider economy. The Airports Commission estimated that direct negative impacts to passengers, such as fare increases and delays, would range from £21 billion to £23 billion over 60 years. Without expansion, capacity constraints would impose increasing costs on the rest of the economy over time, lowering economic output by making aviation more expensive and less convenient to use, with knock-on effects in lost trade, tourism and foreign direct investment.***



2.17 It is very challenging to put a precise figure on these impacts, but using alternative approaches the Airports Commission estimated these costs to be between £30 billion and £45 billion over 60 years. The Airports Commission urged caution interpreting these figures, which overlap with the direct passenger costs reported above and so are not wholly additional. But they do illustrate that **not increasing airport capacity carries real economic costs to the whole economy beyond aviation passengers.**”

4.1.2 These paragraphs reflect and apply directly to the documented position at Gatwick Airport.

4.1.3 Flightpath to the Future is consistent:

*“Equally, it is critical that the existing capacity of airports is managed as efficiently as possible. Airport slots are used to manage capacity at eight of the busiest airports in the UK. **The airport slot allocation system is key to the successful functioning of these airports, as well as the efficiency and competitiveness of the aviation sector as a whole.** The current slot allocation system was devised in the early 1990s, at a point at which demand was growing quickly and the amount of available capacity at certain airports was being rapidly filled. **Some airports are now effectively full, and therefore newly available slots at some slot-coordinated airports have become a rarity, creating a barrier to competition and new entrants to the market.**” (p.26)*

4.1.4 These factors are particularly apparent at Gatwick and the fact that Government policy specifically highlights the importance of these matters is directly relevant to this examination.

## 5 Gatwick Qualifies for Government Policy Support

5.1.1 Some relevant representations draw attention to paragraph 1.6 of the ANPS which provides that the Airports Commission “*considered it imperative that the UK continues to grow its domestic and international connectivity in this period, which it considered would require the more intensive use of existing airports other than Heathrow and Gatwick.*”

- 5.1.2 The context for that recommendation from the Commission was that it was shortlisting in its Interim Report both Heathrow and Gatwick for consideration of which airport should be supported in policy for the development of a new runway. Such was the need for aviation capacity, however, all other airports should make best use of their potential. In the Airport Commission’s final report (and in the ANPS) Heathrow was supported for the new runway but all other airports were encouraged to make best use.<sup>12</sup>
- 5.1.3 Paragraph 1.24 of the APF confirms that “*The Government wants to see **the best use of existing airport capacity***” and paragraph 1.60 of the APF summarises the Government’s strategy, as follows:
- “Taking into account responses to the scoping document, our strategy is based on a suite of measures focused on:*
- ***making best use of existing capacity to improve performance, resilience and the passenger experience;***
  - ***encouraging new routes and services;***
  - *supporting airports outside the South East to grow and develop new routes; and*
  - *better integrating airports into the wider transport network.”*
- 5.1.4 Making best use is, therefore, a long standing policy.
- 5.1.5 **The ANPS confirms the importance of airports making best use of the infrastructure at paragraphs 1.39 to 1.42.** It responds to the finding of the Airports Commission that “***it is imperative that the UK continues to grow its domestic and international connectivity in this period, and this will require the more intensive utilisation of existing airports..***”
- 5.1.6 Similarly, in Flightpath to the Future (2022), the Government stated “*It is essential that we utilise existing airport capacity in a way that delivers for the UK.*” (page 18)
- 5.1.7 Beyond the Horizon (2018) is principally concerned with giving effect to that policy - encouraging better use of existing airport infrastructure.

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<sup>12</sup> Airports Commission Final Report paragraph 16.1 and page 339.

- 5.1.8 At paragraphs 1.5 and 1.25 Beyond the Horizon makes clear that the Government is supportive of all airports who wish to make best use of their existing runways, except Heathrow, the policy for which is set out in the ANPS.
- 5.1.9 Some Written Representations have asserted that this does not apply to the NRP, which involves the repositioning of an existing runway, so that it may be better used, rather than the simple use of that runway as it stands today. This point is addressed directly in the **Planning Statement** [APP-245] from Section 8.2.3.<sup>13</sup> There it demonstrates that all policy documents support both best use of existing infrastructure and best use of existing runways. Because of the emphasis placed on this point by some Interested Parties, GAL has responded more fully to this matter elsewhere – please see in particular **The Applicant’s Response to Written representations from CAGNE** [Doc Ref 10.14], which also draws on material submitted by GAL to the examination at Deadline 1 (**Written Summary of Oral Submissions at ISH1** [REP1-056] and **Response to Actions at ISH1** [REP1-062]). The matter is also addressed in response to ExQ1 CS.1.26.
- 5.1.10 Similarly, the fact that the NRP involves investment in airport facilities beyond the northern runway should be regarded positively. In recent proposals at Bristol, Stansted, Luton and Manston each application involved additional development beyond the increased use of a runway.<sup>14</sup> At Manston the Secretary of State was clear that the Government welcomes significant levels of private investment in airport infrastructure (paragraphs 48 and 64-65) and that the MBU policy does not include a cap on any associated increase in ATMs (paragraphs 47 and 71).
- 5.1.11 The Government has confirmed that its forecasts for airport capacity growth are consistent with its MBU policy and that these include the full capacity of the NRP application.<sup>15</sup>

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<sup>13</sup> The relevant background starts with the Aviation Policy Framework, which was in place even before the Airports Commission was established to look at aviation capacity in the South East. Like several of the aviation policy documents, the APF uses the term “make best use of existing runway capacity” as well as best use of “existing airport capacity” (page 10 and paragraph 1.24). Paragraph 1.60 makes clear the policy support for making “best use of existing airport capacity to improve performance, resilience and passenger experience”. The two phrases are used interchangeably but the intention is clear – to create additional aviation capacity (Planning Statement paragraph 8.2.5). Whether exiting infrastructure, existing capacity or existing airports are making best use, the result will be increased use of existing runways.

<sup>14</sup> In the Stansted decision at footnote 5, the Inspectors noted that “*There is nothing in MBU which suggests that making best use proposals cannot involve operational development of the type proposed in this case.*” (new taxiways and additional aircraft stands)

<sup>15</sup> “*In June 2018, the government set out its policy support for airports to make best use of their existing runways in Beyond the Horizon: The future of UK aviation: making best use of existing runways (“MBU”) and a new runway at Heathrow Airport in the Airports National Policy Statement: new runway capacity and infrastructure at airports in the South East of England (ANPS), subject to related economic and environmental considerations. In common with the Jet Zero Consultation the capacity assumptions in our modelling reflect and are aligned with these policies.*” (Jet Zero Modelling Framework para 3.18.) Annex D to the Modelling Framework (page 50) **shows the modelling assumption of 386,000 ATMs for Gatwick.**

- 5.1.12 This reflects the reality acknowledged by the Airports Commission that there may be a significant delay before a third runway is provided at Heathrow. It also reflects the simple principles of sustainability – compared with the disruption and historic difficulty of additional new green field runways, making better use of infrastructure within an airfield is inherently more achievable and more sustainable.

## 6 Net Zero Commitments do not Diminish the Policy Support

- 6.1.1 These matters are addressed in the **Planning Statement** [APP-245] from paragraph 6.2.28 and are unequivocally established in the Government’s Jet Zero Strategy and its One Year On follow up.

*“Our approach to sustainable growth is supported by our analysis (set out in the supporting analytical document) which shows that **we can achieve Jet Zero without the Government needing to intervene directly to limit aviation growth.** The analysis uses updated airport capacity assumptions consistent with the latest known expansion plans at airports in the UK. The analysis indicates that it is possible for the potential carbon emissions resulting from these expansion schemes to be accommodated within the planned trajectory for achieving net zero emissions by 2050, and consequently that our planning policy frameworks remain compatible with the UK’s climate change obligations.”*  
(JZS para 3.57)

- 6.1.2 The Government’s policy objectives for aviation and for carbon are not, therefore, incompatible. As the Government made clear in its response to consultation on the draft Jet Zero Strategy:

*3.4 Furthermore, airport growth has a key role to play in boosting our global connectivity and levelling up in the UK. The Government is, and remains, supportive of airport expansion where it can be delivered within our environmental obligations. **Our existing policy frameworks for airport planning - the ANPS and MBU - provide a robust and balanced framework for airports to grow sustainably within our strict environmental criteria. We do not, therefore, consider restrictions on airport growth to be a necessary measure.**”*  
(Planning Statement 6.2.36)



- 6.1.3 Similarly in its Response to the annual report of the Climate Change Committee, in October 2023, the Government explained that:

*“DfT analysis shows that, **in all modelled scenarios, we can achieve our net zero targets by focusing on new fuels and technology, rather than capping demand, with knock on social and economic benefits.**”*

- 6.1.4 These matters, which must be strongly material to a decision in this case, are not acknowledged or given discernible weight in the LIRs or in the Authorities’ Written Representations.