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## Gatwick Airport Northern Runway Project: Comments on Deadline 3 submission by Gatwick Airport Limited

### 1. Introduction

- 1.1.1. This representation is submitted by LHR Airports Limited and Heathrow Airport Limited to provide comments on the Deadline 3 submission by Gatwick Airport Limited (GAL) titled ‘Appendix C – Response to Written Representation from LHR Airports Limited and Heathrow Airport Limited’ [REP3-075] (the “D3 Submission”).
- 1.1.2. 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 document specifically, both companies are treated as a single interested party and referred to as ‘Heathrow’. For ease of reference, Heathrow’s Written Representation dated 12 March 2024 was submitted at Deadline 1 [REP1-192] (“Heathrow’s WR”).

### 2. Heathrow’s Comments

- 2.1.1. As set out in Heathrow’s WR, Heathrow does not object to the principle of growth at Gatwick. Heathrow is interested to ensure that additional airport capacity in the South East of England is consented and delivered in a way that is consistent with relevant national policy. Heathrow’s WR explained the background to national policy on the need for and provision of additional airport capacity in the South East of England and set out our understanding of relevant policy in the Airports National Policy Statement (ANPS) and the ‘Beyond the Horizon – The Future of UK Aviation: Making Best Use of Existing Runways’ (MBU).
- 2.1.2. We do not repeat the detail of Heathrow’s WR in this submission, but we continue to rely on it in full and emphasise the importance of national policy in the ANPS and MBU being correctly interpreted and applied. In summary, Heathrow’s position is that:
  - i. national policy in the 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 North West Runway (NWR) scheme;
  - ii. the Government has also expressed policy support for airports other than Heathrow making best use of their existing runways in the shorter term;
  - iii. to be consistent with the existing policy framework in the ANPS and MBU:

- a) any scheme brought forward under the MBU policy must complement and not threaten the future delivery of additional hub capacity at Heathrow airport through the NWR scheme; and
- b) GAL must therefore demonstrate 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.
- 2.1.3. Heathrow has carefully reviewed the D3 Submission and notes the agreement (paragraph 1.1.5) with much of the analysis set out in our WR. We are grateful for the time taken by GAL to consider and respond to the matters raised in Heathrow's WR. The remainder of this document sets out our comments on a number of specific points made in the D3 Submission relating to national policy.
- 2.1.4. Paragraphs 2.3.1 to 2.3.5 of the D3 Submission suggests that the AC's recommendations relating to making best use of other airports were not time limited and reference is made to a statement on page 339 of the AC's Final Report. As explained in Heathrow's WR, the Government was explicit in setting the terms of reference for the AC that it wanted recommendations for short term measures to improve the use of existing runway capacity, but any such measures needed to be consistent with the credible long term options for increasing airport capacity to maintain the UK's global hub status and we respectfully request that the Examining Authority considers paragraphs 2.2.2 to 2.2.16 and in section 2.4 of Heathrow's WR, which sets out the relevant background and provides references to the source documents.
- 2.1.5. The D3 submission (at paragraph 2.3.4) states that making best use is a longstanding policy and refers to a statement in paragraph 1.24 of the Aviation Policy Framework (APF) (March 2013) that "The Government wants to see the best use of existing capacity". Paragraph 1.24 of the APF is in a section headed "The growth and importance of airports outside London".
- 2.1.6. At paragraph 2.3.6 the D3 Submission describes paragraph 1.39 of the ANPS as a "an unqualified expression of a clear policy principle." Heathrow agrees that paragraph 1.39 of the ANPS confirms that the Government is supportive of the airports beyond Heathrow making best use of their existing runways. As explained in Heathrow's WR (see particularly section 2.4), paragraph 1.39 must be read in its proper context together with paragraphs 1.41 and 1.42 of the ANPS.
- 2.1.7. Heathrow notes the comments in the D3 Submission that policy support for airports making best use of their existing runways is unrelated to the development of a third runway at Heathrow (paragraph 2.5.5) and that the ANPS does not set a test or requirement for any type of need to be met by an MBU proposal (paragraph 3.1.2).

Whether this is a correct interpretation of policy will need to be considered by the Examining Authority and Secretary of State, particularly in the light of paragraphs 1.41 and 1.42 of the ANPS. In considering that issue, we ask that Heathrow's WR is taken into account in full. Our view of the proper interpretation of the ANPS and MBU policies in relation to the Gatwick NRP is summarised at paragraph 2.1.2 of this document above.