



Gatwick Airport Northern Runway Project

Appendix C: Response to CAGNE's Deadline 3 Submission

Book 10

VERSION: 1.0

DATE: MAY 2024

Application Document Ref: 10.24

PINS Reference Number: TR020005

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1 Introduction

- 1.1.1 At Deadline 3, CAGNE submitted a response to ExQ1 CS.1.24 [REP3-112], which had been directed at CAGNE in the light of its Written Representation [REP1-137] which had asserted that “a proposal for a second runway at Gatwick (i.e. a proposal which would allow for dual runway operations at Gatwick) was one of the “other shortlisted schemes”” considered and rejected by the Airports Commission and the ANPS. The question drew attention to the fact that the Gatwick proposal before the Airports Commission considered a full spaced southern runway, as opposed to the proposal in this case and asked whether there is a distinction to be drawn between the two proposals.
- 1.1.2 This document responds to CAGNE’s reply, which maintained that the design of the NRP may be different, but its effect was the same and that it should be treated the same in terms of policy as the full spaced southern runway.
- 1.1.3 CAGNE’s asserts that the NRP would create a “new runway” in the South East because the project would allow two runways to operate simultaneously at Gatwick.
- 1.1.4 CAGNE’s Deadline 3 submission also asserts that the scale of growth in the NRP far exceeds that anticipated in making best use (MBU) (paragraph 9), that any latent potential of the northern runway does not exist because works are necessary to release that capacity and the work required “*includes removing the current emergency/standby runway and constructing a new main runway in a different position.*” (paragraph 15).

2 The Applicant’s Response

- 2.1.1 The fact that physical works are necessary to enable the potential of the northern runway to be released does not logically mean that the project cannot be MBU. If that were the case, planning or development consent would not be necessary for any MBU proposals and the MBU policy would be redundant.
- 2.1.2 GAL has submitted evidence to the examination to show that the scale of works necessary in this case is not inconsistent with that which has been proposed and consented elsewhere as MBU (**The Applicant’s Response to Actions arising from ISH1 [REP1-062]** at section 3.5). Earlier in the same document (at paragraph 3.2.14 and in Appendix A), GAL demonstrated the entirely different nature of the works that would be involved in the development of a full spaced second runway.

2.1.3 Similarly, the examination is aware from GAL's submissions (for example in **The Applicant's Response to Actions arising from ISH1** [[REP1-062](#)] at paragraph 3.3.4 that):

- "There is nothing in MBU which suggests that making best use proposals cannot involve operational development of the type proposed in this case." (Stansted).
- "The **MBU policy** does not limit the number of MBU airport developments that might be granted and **does not include a cap on any associated increase in ATMs** as a result of intensifying use at MBU developments." (emphasis added) (Manston decision letter paragraph 47).
- MBU developments can be of a scale requiring DCO or TCPA approval by the relevant authority (ANPS paragraph 1.42 and Beyond the Horizon paragraph 1.27).

2.1.4 These points were made by GAL at Deadline 1, but CAGNE chose not to respond to them.

2.1.5 CAGNE's case appears to either ignore that there is a northern runway at Gatwick which is significantly underused (and for which a policy of making best use is ideally suited) or to find it necessary to assert that GAL proposes to remove that northern runway and build a new runway in a different place, which of course would involve a completely different construction project from that applied for.

2.1.6 Equally, CAGNE's analysis of the outcome is partial. It fails to recognise the significance of the following:

- a. Gatwick's main runway is 3,316m long and a new southern runway would have been of comparable length at 3,400m. The ANPS (at paragraph 2.15) requires Heathrow's north west runway to be at least 3,500m in length. The length of the new runways considered by the Airports Commission meant that they would have been capable of supporting all aircraft codes.

The northern runway is 2,561m and certified only for up to Code E aircraft (limiting its passenger and long haul capacity) and the Draft DCO further requires that the repositioned northern runway must not be used for arrivals or the departures of aircraft larger than Code C aircraft (Requirement 19(3)).

- b. The southern runway proposed at Gatwick and the north west runway at Heathrow were fully spaced, allowing them to operate independently with the

consequence that the lack of dependency would enable significantly greater movements. The ANPs requires the north west runway at Heathrow to support at least an additional 260,000 ATMs (at paragraph 2.15). Gatwick's southern runway was promoted as having the capacity to bring Gatwick to 560,000 ATMs.

The routine use of the northern runway proposed in this application is dependent on the operation of the main runway and it shares the same flightpaths / airspace. It is forecast to add only 60,000 ATMs, and to bring Gatwick to 386,000 ATMs.

- 2.1.7 It is apparent that the NRP was not considered as a candidate for the new runway in the south east. It would not have made any shortlist for that purpose and it is entirely false to suggest that it (or its effect) has already been considered by the Airports Commission and rejected. GAL fully accepts that existing government policy continues to set out the need for a new full length, full spaced runway in the south east and that the NRP application involves no challenge to the position set out in the ANPS.
- 2.1.8 It is the case that the NRP was not promoted to or considered by the Airports Commission. As a potential project, it was first put forward for public consultation in GAL's draft Masterplan in October 2018. Its scale and potential were not known to the Government as it prepared and published either the ANPS or Beyond the Horizon. It is nevertheless apparent that it meets MBU policy (which contemplates that proposals may come forward which add at least 10mppa and require DCO consent) and has been modelled as such in the Government's own modelled assessments for the JZS.