



Gatwick Airport Northern Runway Project

Appendix D: Response to Heathrow's Deadline 3 Submission

Book 10

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1 Introduction

1.1.1 At Deadline 3, Heathrow Airport Limited (Heathrow) submitted a response [[REP3-132](#)] to ExQ1 CE.1.1 in relation to cumulative impacts. The Applicant's response to the same question is set out in **The Applicant's Response to ExQ1 – Cumulative Effects** [[REP3-088](#)].

1.1.2 In its response, Heathrow stated:

“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.”

1.1.3 Whilst noting GAL's explanation that the uncertainty about the timing of a third runway at Heathrow (and the lack of sufficient information relating to any third runway proposals) meant that a full cumulative assessment could not meaningfully be carried out, Heathrow then stated only this in response:

“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 The Applicant's Response

2.1.1 GAL has not doubted or challenged the policy status of a third runway at Heathrow. That status is fully accepted throughout the NRP application material, including at **ES Chapter 6: Approach to Environmental Assessment** [[APP-031](#)]: which explains:

“6.5.39 Given the continuing uncertainty surrounding when, or indeed if, a third runway will now be developed at Heathrow, it is considered that the most robust

assumption to adopt is to assume that a third runway does not come forward at Heathrow. However, without prejudice to this position, and recognising that Heathrow R3 remains government policy, it is considered as a separate sensitivity test for potential cumulative effects with the Project. This has been undertaken in the event this were to come forward around the later assessment periods for the Project. Therefore, the assessment years of 2038 and 2047 have been used and a high level, qualitative assessment has been undertaken.”

2.1.2 The Applicant has seen nothing to suggest that this position, as set out in **ES Chapter 20: Cumulative Effects and Inter-Relationships** [[APP-045](#)], has changed.

2.1.3 **ES Chapter 20: Cumulative Effects and Inter-Relationships** [[APP-045](#)] and **The Applicant's Response to the ExA's Written Questions (ExQ1) - Cumulative Effects** [[REP 3-088](#)] explain that given the Heathrow R3 project pause in 2020 and the ongoing uncertainty as to any restart to the consenting work, the third runway does not require consideration as part of any cumulative assessment for the purposes of Advice Note 17 or the EIA Regulations more generally. However, notwithstanding this position, and recognising that the third runway is supported in principle by government policy, the Applicant has considered that project as a sensitivity within its cumulative effects assessment. If cumulative effects with that project are considered, Table 20.7.2 in Chapter 20 includes, as far as possible, information on whether and how such effects may occur. The entries under each topic explain why fuller information cannot be provided at this stage. A detailed assessment cannot be undertaken without information on the project timeline for a third runway or, for instance, what airspace changes may be necessary to accommodate it. The table indicates, however, that for several environmental topics, it is not anticipated that any likely significant cumulative effects would occur, for instance, given that:

- the distance between the airports means that any site-based impacts will not interact;
- in any airspace configuration it is unlikely that the LOAELs for air noise would overlap; and
- Heathrow is committed to a "no more traffic scenario" (ANPS paragraph 5.38).

2.1.4 The assessment also recognises that the development of a third runway would be likely to impact on the growth of air traffic at Gatwick, particularly long haul traffic, so that a cumulative impact assessment would be likely to show lower impacts at Gatwick for operational effects such as noise, traffic and air quality.

2.1.5 It is not correct, therefore, to say that a third runway at Heathrow has been excluded from any assessment.

2.1.6 Heathrow's response to ExQ CE1.1 then states that:

"2.14 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.*

2.15 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".

2.1.7 A detailed assessment of the cumulative environmental effects of the Gatwick NRP and the Heathrow NWR is not possible given the absence of information about the NWR. Even if it was, however, it would address any cumulative environmental effects, rather than the issues raised by Heathrow. These matters were responded to in **The Applicant's Response to Written Representations – Appendix C – Response to Heathrow Airport Limited [REP3-075]** at Deadline 3.