



# Gatwick Airport Northern Runway Project

## Appendix D: Response to Heathrow Airport's Deadline 4 Submission

### Book 10

VERSION: 1.0

DATE: JUNE 2024

Application Document Ref: 10.38

PINS Reference Number: TR020005

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## 1 Response to Submissions from Heathrow Airport Limited at Deadline 4

### 1.1 Introduction

1.1.1 GAL is grateful to Heathrow Airport Limited (Heathrow) for its submission at Deadline 4 [\[REP 4-118\]](#), which responded to GAL's document [\[REP 3-075\]](#), which in turn had responded to the Written Representations originally submitted by Heathrow [\[REP 1-192\]](#).

1.1.2 Helpfully, Heathrow confirms that it does not object to the principle of growth at Gatwick, so long as that growth is consistent with relevant national policy.

1.1.3 National policy, of course, directly confirms that "*the government is supportive of airports beyond Heathrow making best use of their existing runways*" (ANPS paragraph 1.39) and that "*government believes there is a case for airports making best use of their existing runways across the whole of the UK*" (MBU paragraph 1.25). That paragraph of MBU goes on to explain that Heathrow is the only airport to which the policy does not apply. Government policy for Heathrow is set out in the ANPS. In other words, relevant national policy supports the principle of Gatwick making best use of its existing runways, without qualification.

1.1.4 The submissions already made by GAL and by Heathrow on these subjects do not need to be repeated and GAL respectfully refers the Examining Authority to its position set out in [\[REP 3-075\]](#).

1.1.5 However, Heathrow's further submissions at D4 make two particular points:

- "*...the government was explicit in setting the terms of reference for the Airport's Commission that it wanted recommendations for short term measures to improve the use of existing runway capacity...*"; (Heathrow para 2.1.4) and
- the reference made by GAL to government support for the best use of existing capacity as a long standing policy in the APF only applied to airports outside of London. (Heathrow para 2.1.5).

### 1.2 Short Term

1.2.1 GAL addressed this issue in [\[REP 3-075\]](#) from paragraphs 2.3.1-2.3.3 where it drew attention to the following:

- the full terms of reference of the Airport's Commission asked the Commission to identify and evaluate *"how any need for additional capacity should be met in the short, medium and long term"*<sup>1</sup>;
- the Airport's Commission's recommendations in its Final Report confirmed that *"the need to make best use of existing infrastructure will remain"* (page 339).
- As set out in [REP 3-075], it is important not to confuse the task set for the Airport's Commission in its interim report and in its final report.

1.2.2 In GAL's view, therefore, the position in relation to the Airport's Commission is clear. Even more importantly, the Government has since set clear national policy based on the recommendations of the Airport's Commission and other considerations. As set out above, the MBU policy is not expressed to be time limited. Given the constraints on national aviation capacity and the prolonged difficulty of delivering new airport capacity in the south-east, that is hardly surprising.

### 1.3 Outside the South-East?

1.3.1 Heathrow points out that the reference made by GAL to the MBU policy in the APF was under a heading relating to airports outside London. However, in its submission at D3, GAL was simply seeking to point out that making best use of existing capacity has been a long standing policy. Within the APF there are several references to the MBU policy including at paragraphs 1.60 and 1.67 where the general principle clearly applies to all airports (at that time, including Heathrow).

1.3.2 There is no basis in history or current policy for suggesting that it does not apply to Gatwick.

### 1.4 Decision Making in Practice

1.4.1 Heathrow's submission is also notable, however, for the fact that it does not respond to elements of Gatwick's response to its Written Representations, particularly to Section 2.5 which sets out the way in which the Secretary of State

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<sup>1</sup> <https://www.gov.uk/government/organisations/airports-commission/about/terms-of-reference>

has implemented government policy. There (and by reference to recent planning decisions) GAL explained that recent decisions had confirmed:

- Policy does not include a requirement to demonstrate need;
- there is nothing in MBU which suggests that making best use proposals cannot involve operational development; and
- MBU development can be of a scale requiring DCO approval.

## 1.5 The NRP Application and Heathrow Airport

1.5.1 Similarly, Heathrow's submission does not respond to Section 3 of GAL's response which addressed Heathrow's concern that Gatwick's growth must be different from and not threaten Heathrow's hub status.

1.5.2 The Examining Authority is respectfully referred to those submissions.