



Horsham
District
Council



Gatwick Airport Northern Runway Project

Examination Ref: TR020005

Joint Local Authorities' Deadline 10 Submissions

Deadline 10: 27 August 2024

Crawley Borough Council (GATW-AFP107)

Mid Sussex District Council (20044737)

Reigate and Banstead Borough Council (20044474)

East Sussex County Council (20044514)

Mole Valley District Council (20044578)

Horsham District Council (20044739)

West Sussex County Council (20044715)

Surrey County Council (20044665)

Tandridge District Council (20043605)

Kent County Council (20044780)

This document provides a response at Deadline 10 (27 August 2024) from the Joint Local Authorities as listed above, to the Applicant's submissions made at Deadline 9 in relation to Needs and Forecasting appended to the Applicant's Closing Submissions and Appendix A – The Applicant's Response to York Aviation at Deadline 9.

1. Need and Forecasting

- 1.1 At Deadline 9, the Applicant has submitted further detailed and lengthy material in relation to Need and Forecasting, both appended to the Applicant's Closing Submission [10.73] and in response to submissions at Deadline 8. The fact that the Applicant compelled to do so is telling and strongly suggests the Applicant is not confident that robustness of its demand forecasts, used as the basis for assessing the impacts of the Project and its benefits, has been established through the Examination process. The JLAs and its technical consultants were ready and willing to have further discussions on these matters to see if some areas of agreement could be reached but the Applicant declined to hold further discussions, preferring instead to submit new written material at the end of the Examination when it could not realistically be tested or challenged by interested parties.
- 1.2 In the limited time left in the Examination, the JLAs have not had the opportunity to review this new material in detail, it appears to contain little new in substance, merely repeating past assessments, and the Applicant has not provided new evidence sufficient to change the JLAs' view, informed by analysis, regarding the throughput realistically attainable with the Project in place (75-76 mppa) and in the Baseline Case (57 mppa). When considered along with an anticipated slower take up of the capacity offered by the Project, particularly having regard to the likelihood of consent being granted for other airport expansion over the time period, this is material to the assessment of the effects.
- 1.3 It is important to highlight that the JLAs' motivation in challenging the Applicant's assumptions in relation to demand and capacity has been to ensure that the impacts of the Project are properly understood. To the extent that the Applicant has been unable to evidence or validate some of its assertions, a level of uncertainty remains regarding the effects of the Project and these are material to the decision maker.
- 1.4 At this stage, the JLAs do not wish to make further lengthy submissions but, in response to the Applicant's response to submissions at Deadline 8 [**REP9-xxx**], the JLAs would refer the Examining Authority (ExA) to **REP4-049**, where it was clearly spelled out that the Applicant's assertions as to how the growth attainable in its Baseline Case were considered to simply not add up. It has simply failed to provide any new evidence, as promised at ISH9 [**REP8-112**], to support its contention that there is likely to be material take up of the remaining spare slots at Gatwick ahead of the Project.

1.5 This view is reinforced by the response by British Airways/International Airline Group at Deadline 9 [REP9-xxx] where it is stated that *"The operational concerns we previously raised are still applicable today. Whilst some progress appears to have been made by GAL and its supplier with regards of ATC provision, further work in this regard still requires delivery along with improvements to our other outstanding issues with GAL's existing airfield and terminal operations."* It is also notable that easyJet has not responded to the ExA's request of 14 August 2024 regarding whether its operational concerns had been addressed. This suggests that they have not been and that the airline's previous views hold. The views of the airlines confirm the need for caution regarding the extent to which they will be willing to grow their Gatwick operations in the Baseline Case without the major infrastructure works that make up the Project.

2. **Airspace**

2.1 The JLAs note that the Civil Aviation Authority (CAA) also responded to the ExA's request for an update in relation to the timescale for airspace change [REP9-xxx]. Whilst confirming that Gatwick's proposed airspace change to the south of the airport is likely to be capable of implementation at an early stage of airspace modernisation over the south east of England, the CAA is clear that *"Gatwick Airport is currently sponsoring an airspace change to support the creation of additional airspace capacity, enable the efficient accommodation of additional traffic, facilitate environmental performance improvements, complement Gatwick's infrastructure development and help to address community environmental concerns"*. This statement confirms the JLAs' view that a) the need for airspace change is integrally linked to the uplift in capacity deliverable with the Project and b) this reinforces the concern that the consequences of growth with the Project will be an increasing number of aircraft taking an early left turn from Rwy26 giving rise to increased noise nuisance to communities and designated rural areas in Horsham and surrounding areas.