

Rt Hon Heidi Alexander MP
Secretary of State for Transport
Department for Transport
Great Minster House
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9 June 2025

easyJet response to London Gatwick DCO application of the proposed Northern Runway Project

Dear Secretary of State,

I would like to begin by reiterating our support for airport expansion as a whole and welcoming the Government's recognition of the critical role that aviation plays in driving economic growth across the UK and enhancing international connectivity, as well as its commitment to ensuring that the economic benefits of airport expansion are fully realised.

Thank you for the opportunity to respond to the DCO application made by London Gatwick Airport for its proposed Northern Runway Project. As the largest operator at London Gatwick, we have a number of points we would like to raise with you and the Planning Inspectorate as a key interested party. Our priority throughout this process is ensuring expansion plans have the right infrastructure in place which is affordable, and that expansion does not take place at the expense of delivering meaningful improvements in operational resilience in order to safeguard the customer experience for passengers using the airport.

Stand and airport operations

While we acknowledge the efforts to address stand capacity with the construction of Pier 6, it is imperative to highlight that these additions may not suffice in addressing the current shortfall in stand capacity at the North Terminal. The proposed infrastructure, as it stands, will likely be inadequate upon completion, given the existing demands and the anticipated increase in passenger numbers.

We note that the Examining Authority (ExA) considered the construction of eight additional stands at Pier 6 and Pier 7 to be sufficient capacity for the proposed Northern Runway. As the largest airline by far operating out of the North Terminal, we would disagree with this conclusion. The proposed additional stand capacity for the North Terminal is not sufficient for the current capacity which London Gatwick serves, and we would require additional pier served stands to be constructed as part of the Northern Runway Project.

The reliance on remote stands and the necessity for extensive towing operations to manage first-wave departures are indicative of a deeper, unresolved issue in terminal infrastructure at London Gatwick. These practices not only complicate operations but also adversely affect airlines' on-time performance (OTP), ultimately impacting customer satisfaction. We urge a re-evaluation of the infrastructure plans to ensure that they truly cater to the operational needs without blending the Pier 6 extension into the capacities required for the Northern Runway Project.

Under the current slot regulation, UK airports are able to declare their own capacity on a seasonal basis. The declaration process at LGW is very transparent and data-led. However, the views of the airlines when proposed changes to capacity are brought to the Coordination Committee are often disregarded. This is relevant as, currently, the performance of the airfield is not modelled or captured in the capacity process. There is no denying that LGW has the most efficient runway in the world and can indeed deliver an hourly throughput that is unrivalled; however, getting an aircraft from its stand to the runway is where the pinch point currently is from an airfield perspective. Adding further movements to what is already an underperforming apron area will only exacerbate the problem further.

It is also worth considering the impact on the landside check-in areas and departure lounge of additional capacity. The current check-in areas are insufficient to deal with a sizable increase in passenger numbers, particularly if a manual process is required. This is also true of the departure lounge, which is currently unable to accommodate many more passengers in the peak times. This is all made clear in the capacity declaration assessment packs that are presented to the Coordination Committee.

Security and Immigration

As London Gatwick looks to expand operations, the efficiency of security and immigration processes becomes even more critical. Delays in these areas can significantly impact customer experience and operational efficiency. The ExA and letter from the Secretary of State in February 2025 did not make any reference to our concerns on the capacity of security and immigration facilities as part of the Northern Runway Project. We therefore seek assurances that investments and expansion in security and immigration facilities will be detailed to airlines directly and through the DCO to ensure they keep pace with the increased passenger and flight crew volumes, ensuring swift and secure processing that matches the enhanced infrastructure.

Airspace reform

Airspace modernisation must be completed to ensure the economic benefits of the London Gatwick Northern Runway Project, as we highlighted in our initial response. As well as being the quickest way to reduce carbon emissions now, expansion at London Gatwick more than anywhere else would not be feasible without modernised airspace due to constrained airspace.

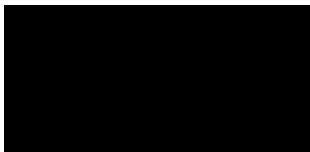
We welcome the Government's commitment to airspace modernisation and the recent announcements regarding the creation of the UK Airspace Design Service. We are working with London Gatwick proactively on proposed changes to the South London Airspace around London Gatwick to support the Northern Runway Project, and we are pleased to be working collaboratively on this area.

However, the detachment of airspace modernisation from the Northern Runway Project as outlined in your letter in February 2025 is concerning. Airspace modernisation is crucial for managing increased air traffic efficiently and sustainably. We believe that integrating airspace planning with the additional capacity the Northern Runway Project will bring is essential to avoid additional delays from already full airspace around Gatwick and the South of England whilst looking to remove additional carbon from the atmosphere. To be clear, without airspace modernisation, we do not believe additional capacity can be added to London Gatwick, without this being to the detriment of the customer experience. A holistic approach would ensure a smoother implementation of the Future Airspace Strategy Implementation programme and better alignment with environmental and operational goals.

Additionally, since our last submission as part of the DCO process, the Government welcomed the exploration of a third runway at London Heathrow Airport. Whilst this is a move we welcome, we believe that the application process for a third runway at London Heathrow could lead to delays in Gatwick being able to tackle its airspace due to potential knock-on impacts from Heathrow. We would urge the Government to work to ensure that any additional runway capacity in the London area does not further delay airspace reforms at London Gatwick Airport.

In conclusion, while we recognise the steps taken towards enhancing Gatwick's infrastructure, significant concerns remain unaddressed. These issues, if not resolved, could undermine the potential benefits of the Northern Runway Project. We look forward to a constructive dialogue to address these points comprehensively.

Best regards,



Kenton Jarvis
CEO, easyJet