

**Gatwick Northern Runway Project (Project Reference: TR020005)**  
**East Sussex County Council Registration Identification Number: 20044514**  
**Deadline 4 [REP4-] Submission**

**D4.E Comments on any further information/ submissions received by Deadline 3**

E.1 Further to ESCC's Deadline 3 covering letter submission [REP3-199] there is additional information we wish to submit for consideration.

E.2 This includes:

- York Aviation Paper – Response to Additional Documents submitted at Deadline 3
- Environmentally Managed Growth Approach
- Sustainable Transport Fund
- Other documents being submitted by Crawley Borough Council on behalf of (all or specific) Joint Local Authorities

***York Aviation Paper – Response to Additional Documents submitted at Deadline 3***

E3. York Aviation (YAL) has been appointed by the Host and Neighbouring Authorities, known as the Joint Local Authorities (JLAs), to provide advice in relation to aviation capacity, need and forecasting, and aspects of the socio-economic case for Gatwick Airport Ltd.'s (GAL's) North Runway Project (NRP).

E4. YALs submission is prepared in response to documents submitted at Deadline 3 relevant to the Needs Case and associated matters as listed above. Crawley Borough Council (CBC) will be submitting this document on behalf of the Joint Local Authorities (JLAs), and ESCC is in support of this.

***Environmentally Managed Growth (EMG) Framework***

E5. In our covering letter to Deadline 3 [REP3-119] we referred to a suggested JLA approach to setting thresholds for key matters (air quality, aircraft noise, greenhouse gases (carbon) and surface access) and aligning such thresholds with the future growth of the airport, similar to the Green Controlled Growth approach presented at the Luton Airport DCO. This was referred to in 'Ref 17' of ESCC's Principal Areas of Disagreement Summary Statement (PADSS) submission submitted on 26 March 2024 [REP3-120].

E6. CBC will be submitting a document on behalf of the JLAs at Deadline 4 on 15 May which will introduce into the Examination an outline of an Environmentally Managed Growth Framework ('The Framework'). The Framework will set environmental thresholds to sustainably manage the growth of the airport. The Authorities are CBC, Horsham District Council, Mid Sussex District Council, Mole Valley District Council, Reigate and Banstead Borough Council, Tandridge District Council, East Sussex

County Council, Surrey County Council and West Sussex County Council. ESCC supports and endorses the submission of this document by CBC.

### ***Sustainable Transport Fund***

E7. As highlighted in the JLA responses to the ExA Q1 responses to Gatwick's comments, the JLAs are of the opinion that a s106 obligation is not necessarily the most appropriate and enforceable means of providing the Sustainable Transport Fund (STF).

E8. Given that the STF does not constitute a contribution to the Local Authorities, such that it must be included in the s106 agreement, these provisions may have been included to provide comfort to the JLAs' in relation to how certain Surface Access Commitments (SACs) could be funded.

E9. Whilst these assurances are welcomed, the JLAs consider that how the SACs may be funded (such as through the STF) would best be included within the SACs document itself, rather than the s106 agreement. The key point is that the airport operator will be expected to meet its SAC irrespective of the level of funding to be provided and how this is to be secured.

E10. There are specific comments on the Transport Management Fund, for example the authorities accept the principle of having a TMF as a truly unforeseen circumstances mitigation fund. However, they do not accept that only GAL can make a recommendation for an application to the fund and consider that determination of that proposal should be within 6 months, not one year.

E11. Further discussions need to take place about the most appropriate approach to securing funds towards transport improvements relating to mitigating the impacts of the NRP.

### ***Other documents being submitted by Crawley Borough Council on behalf of (all or specific) Joint Local Authorities***

E12. There are other documents being submitted at Deadline 4 by CBC which ESCC endorse and have authorised. These are:

- Rule 17 ExA Q response from YAL
- Construction Dust Management Plan Review
- Air Quality Action Plan Review
- ExQ1 response to GAL responses (refer to D4.C document as part of ESCC's D4 submission for further detail)
- Other Partnership authority legal responses to submitted documents
- ISH 6 / ISH7 / CAH1 post hearing notes (refer to D4.C document as part of ESCC's D4 submission for further detail)
- AECOM response to the noise and vibration technical notes – REP3-071.