



# Gatwick Airport Northern Runway Project

Appendix C: Response to Comments on the oCTMP at  
Deadline 4

**Book 10**

VERSION: 1.0

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## 1 The Applicant's Response to Comments on the Outline Construction Traffic Management Plan

1.1.1 This note has been prepared in response to comments received at Deadline 4 on the **Outline Construction Traffic Management Plan** [APP-085], notably comments contained in:

- **Joint West Sussex Authorities Deadline 4 Comments on any further information / submissions** [REP4-042];
- **National Highways' Mark-Up of the Outline Construction Traffic Management Plan** [REP4-076]; and
- **Royal Mail's Deadline 4 Comments on any further information** [REP4-081].

1.1.2 A revised **Outline Construction Traffic Management Plan** (Version 2.0) (Doc Ref. 5.3) is submitted at Deadline 5, comprising clean and tracked changed versions, and should be read alongside this note.

Section/Para reference and Interested Party (IP)	IP's Comment	Applicant's response
3.1.1 (BDBP1) National Highways	GAL to ensure reference errors are captured	Correction made.
3.1.4 (BDBP2) National Highways	Text may need to be updated on the discussions with GAL still ongoing in relation to the security of these measures	Noted. No change is required to this paragraph, which relates to the funding that GAL has allocated for these works and does not seek to describe how these works are secured.
4.1.2 (BDBP3) National Highways	Not clear why the applicant is limiting the objective to transportation vehicles, rather than those	The oCTMP has been updated to include vehicles carrying materials and plant. Construction worker transportation will be covered in the CWTP in line with the oCWTP.

	more widely used in connection with the construction	
4.1.2 (BDBP4) National Highways	Further emphasis on monitoring required, see further amendments below	The text has been amended to reference monitoring of traffic in line with NH's suggested change.
4.1.4 (BDBP5) National Highways	This has been amended to accurately capture requirement 12	The text has been updated to reflect the wording of DCO Requirement 12.
5.1.1 (BDBP6) National Highways	This paragraph is a mere signpost; in circumstances where construction traffic modelling is not agreed, more is needed to secure the parameters so as to ensure that the impacts in delivery do not exceed those.	This point is noted and text has been added to refer to existing controls in the DCO which secure for example the timing of the delivery of the surface access improvement works.
5.1.2 (BDBP7) National Highways	as per comment above	As explained in para 5.1.4 of the oCTMP, this is an outline document setting out the proposed construction vehicles routes and access to each construction compound. The final routes and access points will be detailed through the CTMP(s); to be subject to consultation and approval under DCO Requirement 12 and the authorised development must be constructed in accordance with the approved plan. On this basis, the additional text suggested by NH is not considered necessary, however, text has been added at paragraph 4.1.4 to clarify that the detailed CTMP(s) will adhere to the

		principles and objectives of the OCTMP.
5.1.4 (BDBP8)  National Highways	as per comment above	<p>Amendments have been included to refer to managing construction traffic impacts associated with the Project in order to ensure the safe and efficient operation of the road network and minimise any negative environmental and community impacts, however it is not considered appropriate for this document to demonstrate that the construction compounds reduce traffic on the Strategic Road Network.</p> <p>The OCTMP will demonstrate the safe and efficient operation of existing roads, where applicable.</p> <p>During the consultation process on the CTMP, GAL will consider any proposals or suggestions put forward by CBC, WSCC, SCC and NH in line with DCO Requirement 12. If a change cannot be taken forward by GAL, sufficient justification will be provided to the relevant authority. It is not considered necessary to set out such a requirement within the oCTMP as this is standard good practice in discharging requirements and engaging with stakeholders, which GAL will follow. The extent and strength of wording put forward by NH is also not considered reasonable or necessary.</p> <p>On the basis of the above, no change required to the oCTMP text.</p>
5.6.2 (BDBP9)  National Highways	To ensure that the secondary point of access is managed safely there must be an explicit commitment to ensure that public access is prohibited and the CTMP must set out how this will be achieved	Alternative wording has been incorporated within the oCTMP to make clear that public access to the secondary access point is restricted in line with NH's request.
5.6.2 (BDBP10)	NH is concerned that construction	Comment Accepted. The text has been amended in response to NH's request. It now makes clear the

National Highways	traffic queuing onto the network the access needs to be designed and monitored based off the forecasts to ensure safe and efficient operation of the network and managed in accordance with the relevant standards	CTMP will set out measures to control queuing traffic onto the road network relating to this compound access point.
5.6.2 ( <b>BDBP11</b> ) National Highways	NH are concerned that if not sufficiently set back within the site there would be adverse impacts as a result of queuing traffic	GAL cannot commit to any specific setback of the access until the compound entrance has been designed. The access will be designed to the relevant standards. As noted above, the CTMP will set out measures to control queuing traffic on the road network.
6.1.1 ( <b>BDBP12</b> ) National Highways	This amendment has been made to ensure that the document controls the impacts of construction vehicle access and egress	Comment Accepted. The oCTMP has been updated to reflect NH's suggested text.
6.1.2 ( <b>BDBP13</b> ) National Highways	Explicit inclusion to demonstrate how the indicative routing will inform the CTMP	Comment Accepted. The oCTMP has been updated to incorporate alternative wording to reflect NH's comment. This paragraph has also been updated to reflect DCO Requirement 12.
6.1.3 ( <b>BDBP14</b> )	NH Consider that this commitment as	Alternative wording has been incorporated within the oCTMP to address NH's request.

National Highways	currently drafted provides no certainty that those measures will be implemented. The amendments that that have been made explicitly commit GAL to implement the restrictions and prohibitions outlined below	
6.1.4 ( <b>BDBP15</b> )  National Highways	This amendment has been made to explicitly commit the applicant to the implementation of the prohibition on certain routes subject to exceptions	Comment Accepted. The oCTMP has been updated to incorporate the amendment.
6.1.4 ( <b>BDBP16</b> )  National Highways	Whilst NH does not seek for an approval role under the oCTMP/CTMP, NH consider it necessary to include this provision to ensure that the consultation obligations are sufficiently robust – therefore NH request that justification should be	During the consultation process on the CTMP(s), GAL will consider any proposals or suggestions put forward by CBC, WSCC, SCC and NH in line with DCO Requirement 12. If a change cannot be taken forward by GAL, sufficient justification will be provided to the relevant authority. It is not considered necessary to set out such a requirement within the oCTMP as this is standard good practice in discharging requirements and engaging with stakeholders, which GAL will follow. The extent and strength of wording put forward by NH is also not considered reasonable or necessary.

	<p>provided where GAL does not include a measure suggested by a consultee. Furthermore, given the potential for any of the SRN, NH consider it necessary to include a mechanism to discuss the inclusion of measures if they are deemed to have severe impact on the safe and efficient operation of the SRN</p>	
<p>6.2.1 (<b>BDBP17</b>)  National Highways</p>	<p>Broken Link to be corrected</p>	<p>Noted. The link has been fixed.</p>
<p>6.2.1 (<b>BDBP18</b>)  National Highways</p>	<p>As currently drafted the oCTMP does not provide sufficient as to which routes in the CTMP where construction vehicle access will be prohibited, this amendment commits GAL to specifically outline in the</p>	<p>Alternative wording has been incorporated within the oCTMP to address NH's request.</p>

	CTMP which routes will be prohibited	
6.2.2 ( <b>BDBP19</b> ) National Highways	Tied to the above comments, not only must the oCTMP must ensure that there is sufficient certainty as to which routes will be prohibited for use, but also which routes will be approved for use via construction vehicles	The oCTMP has been updated to address NH's comment.
6.3 ( <b>BDBP20</b> ) National Highways	In appendix A the applicant sets out three categories of routes (Primary, Contingency and Restricted Use). The applicant should make commitments in respect of all three, not just two	Comment Accepted. The oCTMP has been updated to incorporate the amendment.
6.3.1 ( <b>BDBP21</b> ) National Highways	NH consider that the commitment to provide further information needs to include a commitment to consult the relevant planning	Comment Accepted. The oCTMP has been updated to incorporate the comment.



	<p>authorities and NH in accordance with the general requirement to consult as contained in Requirement 12</p>	
<p>6.3.1 (<b>BDBP22</b>)  National Highways</p>	<p>In NH's Deadline 3 representations we made a request that GAL should set the thresholds of instances where contingency access would be utilized. Establishing a clear framework will ensure that GAL do not use these contingency routes where there is no reasonable justification</p>	<p>Comment not accepted: The detailed CTMP will set out situations where the contingency access routes would be used. This is already made clear in para 6.3.1 of the oCTMP and therefore no further text is required. Further to this, para 6.3.2 of the oCTMP makes clear the detailed CTMP will define restrictions to apply to the restricted use access roads and the nature of such restrictions. It is not considered necessary to duplicate the consultation requirements which are already appropriately secured and set out in Requirement 12.</p>
<p>6.4.1 (<b>BDBP23</b>)  National Highways</p>	<p>"Critical construction issue" is inexact. Alternative definition which covers an emergency</p>	<p>NH's suggested definition of emergency cases is considered too restrictive. The wording in the oCTMP has been updated to refer to risk or danger to life or property in response to NH's comment but the text is largely unchanged as considered to be appropriate in that it accounts for emergency cases where there is an immediate risk or danger.</p>
<p>6.5 (<b>BDBP24</b>)  National Highways</p>	<p>No part of the oCTMP deals with the SRN. These measures are put forward to</p>	<p>NH's point is accepted in principle, which corresponds to other Project discussions with NH regarding monitoring of road traffic. Text has been included in the oCTMP that is similar</p>

	<p>secure (1) monitoring; and (2) requirements to take remedial steps. Please note that monitoring below only relates to routes, rather than impacts more generally.</p> <p>All these measures have been taken from the National Highways' outline TMPs included in DCO applications</p>	<p>to that proposed by NH.</p> <p>Regarding NH's request that a scheme of mitigation requires approval from NH, it is noted that the traffic management scheme anticipated in Part 3 of Schedule 9 to the DCO already requires approval by NH.</p>
<p>6.6.2 (<b>BDBP25</b>)</p> <p>National Highways</p>	<p>Addition is to provide a commitment that monitoring will be implemented for the duration of construction</p>	<p>Comment accepted. The oCTMP has been updated in response to NH's comment.</p>
<p>6.6.2 (<b>BDBP26</b>)</p> <p>National Highways</p>	<p>Given that the monitoring of use of designated routes will be central to the efficacy of the CTMP, the oCTMP should, in step with requirement 12 of the DCO, specifically provide for consultation on the monitoring</p>	<p>NH's suggested text is not necessary on the basis that the CTMP will be brought forward in line with DCO Requirement 12 and which sets out the requirement on GAL to consult with the relevant authorities and National Highways.</p>

	system	
6.6.2 ( <b>BDBP27</b> )  National Highways	furthermore, any corrective actions that are taken because of monitoring needs to have a framework for how those action as are approved and consulted on - this approach is consistent with that outlined at 6.1.4	Comment Accepted. The oCTMP has been updated to NH's comment.
6.6.3 ( <b>BDBP28</b> )  National Highways	Impacts on the road network should also be subject to these steps	Alternative wording has been incorporated with in the oCTMP in response to NH's request.
6.7 ( <b>BDBP29</b> )  National Highways	certainty is required as to the timing of the signage proposals	Comment Accepted. The oCTMP has been updated to address NH's comment.
6.7.1 ( <b>BDBP30</b> )  National Highways	As currently drafted the signage proposals could be developed without sufficient input from the relevant local authority / NH. This amendment would provide sufficient certainty that any signage proposal would be subject to approval to the	Comment Accepted. The oCTMP has been updated to incorporate the comment

	<p>relevant highway authority, and in this instance of signage proposal in the SRN brings this section in line with the agreed position in the PPs</p>	
<p>6.8 (<b>BDBP31</b>)  National Highways</p>	<p>As an overall comment this is the kind of detail we had expected to see from GALs oCTMP - there needs to be specific and prescriptive measures outlined in the oCTMP to provide certainty as to kinds of measures that will be taken to mitigate construction impacts on safety</p>	<p>Comment Accepted. The oCTMP has been updated to incorporate the comments</p>
<p>6.9.2 (<b>BDBP32</b>)  National Highways</p>	<p>The applicant has been aware of these works for some time. The lack of certainty provided here must be rectified given the modelled impacts are based on specific routes. Replacement routes must be</p>	<p>Comment Accepted. The oCTMP has been updated to address the comment by setting out replacement routes.</p>

	set out - to avoid the traffic modelling being a chocolate teapot, security must be provided on the routes	
6.9.4 ( <b>BDBP33</b> )  National Highways	As per comments above	Comment Accepted. The oCTMP has been updated to reflect NH's requested text.
7.2.15 ( <b>BDBP34</b> )  National Highways	Encouragement of low emission plant is not a sufficient commitment, rather Low Emission plant should be used where practicable	The Project's compliance with the London Low Emission Zone standards is set out in the Code of Construction Practice (CoCP) [REP4-007].The oCTMP has been updated to reflect the CoCP's commitment in response to NH's comment.
7.2.15 ( <b>BDBP35</b> )  National Highways	As outlined in NH's D3 submissions we consider that GAL should be required to use all reasonable endeavors to align with the London Low Emission Zone Standard	Please see GAL's response to BDBP34.
7.3.1 ( <b>BDBP36</b> )  National Highways	As currently drafted the oCTMP does not provide any requirements that the CTMP will demonstrate how this commitment will be met,	Alternative wording has been incorporated within the oCTMP in response to NH's comment.

	<p>there needs to be a specific provision in the oCTMP requiring the CTMP in include specific provision in the oCTMP requiring the CTMP to include specific measures to avoid deliveries using parts of the network at or near capacity as well as including a specific measure to provide for variable delivery times based on avoiding peak congestion periods</p>	
<p>7.3.2 (<b>BDBP37</b>)  National Highways</p>	<p>In line with requirement 12, there needs to be a specific provision for the consultation on DMS, NH consider that there needs to be a specific framework for how the DMS is dealt with and considered moving forward and the most suitable avenue is the TMF</p>	<p>The oCTMP makes clear that GAL will explore the use of a delivery management system and delivery management zones as the project progresses. However, at this time GAL cannot commit to the use of either a delivery management system or delivery management zones. Such measures will be confirmed through the CTMP, to be subject to consultation and approval in line with DCO Requirement 12.</p>
<p>7.3.3 (<b>BDBP38</b>)</p>	<p>NH do not consider that</p>	<p>Please see GAL's response to BDBP37.</p>

National Highways	the use of explore is sufficiently robust, rather the use of DMS should be committed to in the oCTMP as an effective measure	
7.3.3 (BDBP39) National Highways	As currently drafted, the oCTMP does not require the CTMP to provide any evidence as to how the DMS will be used to avoid peak hours, NH considers that the CTMP should as far as reasonably possibly maximize overnight deliveries. This addition provides certainty that the commitment to use DMS will provide a clear pathway and framework to being an effective measure	Please see GAL's response to BDBP37.
7.3.4 (BDBP40) National Highways	Network peak is more precise and consistent with TA terminology rather than peak traffic	The oCTMP wording has been changed to Network peak within the vicinity of the Project in response to NH's comment.

<p>7.3.6 (<b>BDBP41</b>)</p> <p>National Highways</p>	<p> tied to the above comments, the oCTMP needs to be provided greater certainty as to what measures will be undertaken and how they will be used. The use of will, over could provide such certainty</p>	<p>Please see GAL’s response to BDBP37.</p>
<p>7.4.2 (<b>BDBP42</b>)</p> <p>National Highways</p>	<p>Given the importance that the dfMA as a guidance provides at the detailed design stage it needs to form a central, key consideration rather than simply consideration being given to its incorporation</p>	<p>The comment has been accepted where it is appropriate. The oCTMP has been updated to reflect “key consideration” where it is appropriate.</p>
<p>7.4.5 (<b>BDBP43</b>)</p> <p>National Highways</p>	<p>the commitment to the use of rail is far too woolly as currently drafted. This amendment will ensure that GAL will use reasonable endeavors to secure delivery of materials by rail and such measures must be identified in the CTMP so to provide the</p>	<p>Alternative wording has been incorporated within the oCTMP.</p>



	<p>relevant stakeholders sufficient certainty that all avenues for importation via rail have been explored and secured</p>	
<p>7.5.3 (BDBP44)  National Highways</p>	<p>we consider that GAL should have some oversight to ensure that a collaborative relationship is struck between the other project sites - we do not consider that encouragement goes far enough</p>	<p>Comment accepted, within the scope of NRP projects only.</p>
<p>(BDBP45)  National Highways</p>	<p>As outlined in NH's WR it is critical that the proposed scheme is compliant with the relevant sections of the DMRB and other relevant standards and guidance - given the certainty of the CTMP to the scheme's overall compliance with the DMRB it is considered that a specific commitment to compliance with the DMRB</p>	<p>Comment Accepted. The oCTMP has been updated to incorporate the comment</p>

	where relevant is required	
<p><b>(BDBP46)</b></p> <p>National Highways</p>	<p>NH considers that the establishment of a Transport Management Forum is required to ensure that there is continuous engagement through the construction period on the development of any remedial measures / actions that are required to be taken. This is a well precedented approach to engagement in a number of NH projects and consider it provides a means of ensuring that the engagement on monitoring and the development of remedial measures are effective and timely</p>	<p>Comment regarding the establishment of a Traffic Management Forum is accepted and the oCTMP has been updated to include this.</p> <p>Further discussions are ongoing as to the remit, constitution and terms of reference for the traffic management forum as opposed to the traffic management working group.</p>
<p>Para 2.78, point 1</p> <p>Joint West Sussex Authorities</p>	<p>A commitment to deploy road sweepers on the highway to ensure that detritus is regularly</p>	<p>Road sweepers will be deployed within the immediate roads around the airport.</p>

	cleared from the carriageway	
Para 2.78, point 2  Joint West Sussex Authorities	despite construction routes going on and near local schools there is no commitment to avoid construction traffic movements on these routes at the start and end of the school day/ The highway authority would look for this commitment within the oCTMP	Comment accepted. The oCTMP has been amended to explain that a Delivery Management System will be used to schedule construction deliveries to avoid routes past local schools during peak periods, where possible.
Para 2.78, point 3  Joint West Sussex Authorities	Additional measures should also be put forward to reduce the risks construction traffic poses for road users. Training events, funded by the applicant, could be offered to the local community and to specific audiences such as large local employers and schools near the construction traffic routes. these training events could be specifically tailored to	GAL agrees to this in principle. However details will be provided within the finalised CTMP

	<p>ensure all road users, but specifically cyclists, are aware of safe road positioning and make them aware of HGV blind spots and the projects construction traffic routes, so other road users' behaviors can positively alter to reduce the likelihood of accidents involving construction traffic</p>	
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