Gatwick Airport Northern Runway Project

Examination Ref: TR020005

Joint local Authorities Response to the Applicants Deadline 5 Submissions

Deadline 6: 26 June 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)

1. This document provides a response at Deadline 6 (26 June2024) from the Joint Local Authorities as listed above, to the Applicants Deadline 5 Submissions:

- Combined Traffic and Highways response to:
  - [REP5-020] Environmental Statement Appendix 5.3.2 CoCP Annex3 – Outline Construction Traffic Management Plan Version 2;
  - [REP5-021] Environmental Statement Appendix 5.3.2 CoCP Annex3 – Outline Construction Traffic Management Plan Version 2 (Tracked);
  - [REP5-072] 10.38 The Applicants Response to Deadline 4 Submissions Version 1; and
  - [REP5-075]10.38 Appendix C – Response to Comments on the OCTMP at Deadline 4 Version 1
- [REP5-020] 5.3 Environmental Statement Appendix 5.3.2 CoCP Annex 3 - Outline Construction Traffic Management Plan Version 2
- [REP5-022] 5.3 Environmental Statement Appendix 5.3.2 CoCP Annex 9 - Construction Dust Management Strategy Version 1
- [REP5-029] 5.3 Environmental Statement Appendix 14.9.7 The Noise Envelope - Version 2 (Clean) / [REP5-030] (Tracked)
- [REP5–071] - 10.36 Summary of Airline Support Version 1
- [REP5-072] 10.38 The Applicant's Response to Deadline 4 Submissions Version – Response to ExQ1
- [REP5-075] 10.38 Appendix C - Response to Comments on the oCTMP at Deadline 4 Version 1
- [REP5-077] 10.38 Appendix E - Response to York Aviation's Deadline 4 Submission Version 1[REP4-081] 10.40 Response to Rule 17 Letter - Future Baseline Sensitivity Analysis Version 1
- [REP5-079] 10.38 Appendix G - Response to the JLAs' Comments at Deadline 4 on the Noise and Vibration Technical Notes Version.
- [REP5-081] Deadline 5 Submission - 10.40 Response to Rule 17 Letter - Future Baseline Sensitivity Analysis Version 1

1. Combined Traffic and Highways Response to:

- **[REP5-020] Environmental Statement Appendix 5.3.2 CoCP Annex3 – Outline Construction Traffic Management Plan Version 2;**
- **[REP5-021] Environmental Statement Appendix 5.3.2 CoCP Annex3 – Outline Construction Traffic Management Plan Version 2 (Tracked); and**
- **[REP5-075]10.38 Appendix C – Response to Comments on the OCTMP at Deadline 4 Version 1**

1.1 The Joint Local Authorities welcome the Applicants inclusion of additional measures that have been highlighted by both the West Sussex Joint Authorities and National Highways in this revised Outline Construction Traffic Management Plan (OCTMP) [REP5-20]. Additional measures requested by the West Sussex Joint Authorities, that have

now been included are, a commitment to deploy road sweepers, measures to avoid construction traffic passing schools at start and end times and a commitment to offer road safety training to local businesses, communities and schools. In addition to the main points previously set out, the Joint Authorities have additional comments, which are set out in a tracked change version of OCTMP Version 2 (Tracked) [REP5-021] – see Appendix I. For clarity, this document includes National Highways tracked changes, that have been accepted by the Applicant, and now additionally includes the Joint Authorities comments as separate tracked changes.

1.2 The Joint Local Authorities consider that these changes are necessary to help mitigate the construction impacts of the development and ensure the project draws on best practice from other major construction schemes, as is set out in the Airports National Policy Statement (ANPS).

1.3 The Joint Authorities have also reviewed Appendix 5.3.2 Code of Construction Practice Annex 2 - Outline Construction Workforce Travel Plan [APP-084] and provided tracked change comments on this document – See Appendix II. These changes are considered necessary to ensure, as far as is practically possible, that sustainable forms of travel are encouraged, in line with the National Policy Statement for National Networks and that the project draws on best practice from other major construction schemes, as is required by the ANPS.

2. [REP5-020] 5.3 Environmental Statement Appendix 5.3.2 CoCP Annex 3 - Outline Construction Traffic Management Plan Version 2 - Air Quality

Construction Logistics and Site Support

2.1 Para 5.1.2 - The contractor construction compounds are shown in Appendix A. However, there is no location information shown for off-airport construction compounds (such as the Reedbed construction site) or for the on-airport Wastewater Treatment Works (WWTW).

2.2 Since all the construction compounds are part of the DCO application and the provisions of the oCTMP are relevant to all of the sites, the oCTMP should be amended to show where these sites are.

Construction Vehicle Routes and Access

2.3 6.1.2 - The oCTMP states that "off-Airport construction vehicle routing will be finalised in the detailed CTMP(s) to be developed by GAL in conjunction with its contractors".

2.4 As stated above, the construction compounds are part of the DCO application and the provisions of the oCTMP are therefore relevant to

all the sites both on and off-airport. Vehicle routing for the off-airport sites should be provided at the Examination stage and is arguably more important than on-airport locations due to the potential for impacts on the local road network, residents and AQMAs. This is particularly important for the Reedbed construction where access to the site is located on Radford Road, a relatively quiet residential road in Crawley.

Contingency Access

2.5 6.3.2 states that further information on situations in which is it envisaged that construction traffic would be authorised to use a contingency access will be provided in the CTMPs.

2.6 No reason is given on why this information cannot be provided at this stage. The Authorities would welcome the details of what criteria is being proposed for the authorised use of contingency access by construction traffic through Crawley's AQMA.

2.7 This information would provide opportunity for assessment of the proportionality of the criteria for discussion at Examination.

Restrictions and Monitoring

2.8 6.6.1 - 6.6.3 - The Authorities welcome the improvement in wording in these sections and the commitment to compliance controls in the form of corrective actions.

2.9 However, the Authorities are still trying to understand how deviations or non-compliance will be monitored via the "robust monitoring system". If the Applicant is confident of the robustness of its monitoring system, it should be sharing this information with the IPs for examination.

2.10 Likewise, the Authorities welcome that inclusion of wording for corrective actions such as imposing penalties, implementing additional controls or re-evaluating routes, to be developed (by a traffic management working group) to address non-compliance.

2.11 This is an internal working group (comprising GAL and its principal contractors) and in order for it to be accountable, there should be a mechanism for consultation and approval by the local highway authorities and National Highways to ensure the corrective actions are effective in ensuring local transport impacts are mitigated.

Measures to Reduce Impacts

2.12 **7.4.4 Fleet Operator Recognition Scheme (FORS) -** The Applicant proposes to mandate adherence to the FORS scheme (sec 7.4.8). They identify that the scheme has progressive requirements for achieving FORS accreditation at bronze, silver, and gold levels. They also point out that it is a mechanism by which adherence to the CLOCS (road safety) standard can be assured and monitored.

2.13 The Bronze level is unlikely to result in any improvement in construction fleet emissions. The silver level requires a commitment to reduce emissions, but no firm targets. The Gold level aligns more closely with emissions reductions similar to London Low Emission Zone (LEZ) standards.

2.14 It is therefore recommended that the Applicant amend the wording in 7.4.8 to:

> "Adherence to the FORS ***Gold*** standard will be mandated for all supply chain fleet operators engaged to support the Project."

2.15 This will achieve appropriate emissions improvements and also provide the mechanism they propose by which adherence to the CLOCS standard can be assured and monitored.

2.16 **7.6 Use of Low Emission Construction Plant and Fleet –** At ISH7 (Part 3, from 25:40) the Applicant confirmed that NRMM equipment would meet stage V of the London Non-Road Mobile Machinery standards. However, in its updated CoCP and oCTMP (sec 7.6.2) it only states that Stage V will be required from 2030.

2.17 The oCTMP and CoCP should be amended to accurately reflect the Stage V wording that was committed to at ISH7.

3. [REP5-022] 5.3 Environmental Statement Appendix 5.3.2 CoCP Annex 9 - Construction Dust Management Strategy Version 1

3.1 The provision of a draft Construction Dust Management Plan and the subsequent updates to the plan following the AECOM review are welcome. There are a small number of remaining areas further work/discussion is needed:

- Confirmation is requested that all areas of the proposed development will be covered by an individual DMP.
- A plan of the high risk areas included in the CDMP Strategy would be helpful to the local authorities along with the table of high risk areas (Table 4.1);
- The need for the local authorities to request compliant information or elevated dust soiling data should be replaced with an automatic process that provides this information. The local authorities are not going to know when to ask otherwise and so will not be aware of issues for their residents.
- Further information is requested on how local authorities would gain access to real time monitoring data e.g. Osiris data and other monitoring data (e.g. dust soiling) and visual inspection records (e.g. sharepoint of files updated monthly).

- Confirmation is sought that each area specific DMP will include a map showing the spatial extent of the works area, proximity to the surrounding and the proposed monitoring locations.
- Environmental Statement Appendix 5.3.2 CoCP Annex 9 - Construction Dust Management Strategy Version 1 [REP5-022] Para 3.1.1 - Can this be changed to ensure that when a dust management plan is sent for approval by the local planning authority, that in situations where the dust impacts are potentially in a neighbouring authority that a copy of the proposed management plan will also be sent to the Environmental Health department of that authority so they may feed back to the planning authority responsible for approving the report.
- Additional paragraphs or a section is required on dust soiling and deposition techniques, as dust soiling and deposition are only currently mentioned in the context of reporting.

4. [REP5-029] 5.3 Environmental Statement Appendix 14.9.7 The Noise Envelope - Version 2 (Clean) / [REP5-030] (Tracked)

4.1 The Joint Local Authorities note the minor amendments to the Applicant's proposal and refer to their submissions under REP4-050, REP5-093 and subsequent submission at D6 in relation to this matter.

5. [REP5-071] - 10.36 Summary of Airline Support Version 1

5.1 Please see Appendix III - Gatwick North Runway Project - Rule 17 Response - Future Baseline Sensitivity Analysis.

6. [REP5-072] 10.38 The Applicant's Response to Deadline 4 Submissions Version – Response to ExQ1

Table 1 - Climate and Greenhouse Gases

6.1 CC.1.1 The Applicant has set out their position on the use of offsets and removals noting that they purchase offsets in line with accredited voluntary carbon offset markets as identified under the Airport Carbon Accreditation (ACA) scheme.

6.2 The Authorities acknowledge that the Applicant's approach on carbon offsetting aligns with current best practice and is done so to allow them to comply with the Airports Carbon Accreditation scheme. The Authorities would however still like the Applicant to further explore local offsetting options that would provide additional benefits to the local community and local habitats.

6.3 CC.1.2 With regard to the Applicant's response to the proposed Environmentally Managed Growth Framework see the response under REP5-074.

6.4 CC.1.3 No further comments from the Authorities.

6.5 With regard to the Applicant's response to the proposed Environmentally Managed Growth Framework see the response under REP5-074.

Table 14 - Noise and Vibration

6.6 This section concerns the responses in relation to noise. On the whole the Applicant has not provided any substantive new information or clarification of the position. Increasingly it is noted that the Applicant's documentation needs to be updated and if this is not done then it is likely that errors will occur in the assessment and understanding of the proposal. The absence of data, the quality of ground noise modelling and the absence of a ground noise management plan remain significant concerns. More specific issues are discussed below.

6.7 **NV.1.1 Replacement Noise Bund.** The Applicant has not demonstrated that is has explored all the available techniques to ensure that the bund remains at the existing height or if the height needs to increase as a result of the changes to operational configuration. The Applicant comments that APP-173 provides noise modelling information but does not describe noise barrier options that were considered and how the final scheme was derived. The Applicant has identified that further mitigation is not necessary but has not demonstrated this in a transparent fashion that would allow others to come to the same conclusion. The opportunity to consider if and how the development may improve the situation for local residents appears to be overlooked.

6.8 NV.1.2 Replacement Noise Bund. The locations and alignment of the barrier should be secured through reference to ES Figure 5.2.1g [AS-135] in the Design Principles [REP2-037] for both the western noise bund/ wall and noise barriers at the north and south terminal junctions (item N3 in Table 1.11.1 [REP2-037]). Furthermore, it is difficult to understand how the bund only mitigates noise at one property by 3dB. The Applicant should identify any temporary likely significant noise effects at all potentially affected receptors for the period when there would be no barrier or bund in place. This should be identified through provision of noise modelling results for the 'no mitigation' scenario. The Authorities would also like to see a commitment that no engine ground running is undertaken at the western end of the Juliet runway during the construction of works 18.

6.9 NV.1.3 Noise Designated Airport -The Applicant has responded to the Joint Local Authorities' (JLAs) comments about the status and the need for controls. We note the comments and refer to the Deadline 5 Submission - The requirement for an Environmentally Managed Growth Framework [REP5-093] where the JLAs cite the reasons why it is considered that any DCO granted needs to have improved and broader controls than those that exist at present. It remains the view that the "designated airports have some of the weakest controls in the UK but with the greatest potential for adverse impacts on local communities." Improved controls are not sought simply for the purpose of having control but to meet requirements of both aviation and national planning policy (including the planning tests). The JLAs have clearly expressed their reservations and concerns about the Applicant's proposal for a noise envelope and the way in which it was formulated in REP5-093.

6.10 The JLAs consider that it is important to address the Applicant's comments about the EMG and that planning should not replicate other regimes and the assertion that the JLA proposal contravenes policy. The JLAs' proposal is entirely consistent with National Planning Policy, the Noise Policy Statement for England and aviation policy. It is not seeking to replicate a regime that exists. In fact it is highlighting the very fact that no such regime exists and as such, without any comprehensive scheme formulated within the planning system such development is likely to be judged unacceptable. Furthermore the DCO provides the opportunity to consolidate as may be required to ensure the resultant framework is efficient.

6.11 NV.1.4. Potential Revisions to Airspace. The Authorities consider that there is a linkage between airport infrastructure and airspace capacity and that the effect of increasing infrastructure capacity will lead to additional pressures on airspace. The Applicant still has not demonstrated to the satisfaction of the Authorities that the increased use of Wizad is not directly related to expansion at the airport or that the increased use of Wizad does not require an airspace change. The Authorities also do not understand why there would be a greater increase in flights using Wizad in the absence of the NRP, as stated in Table 44 of [REP5-072]

6.12 NV.1.5 Sensitivity Test for Total Aviation Noise. The Applicant's response is to reiterate their response to the Examining Authority on why it is not necessary to model to lower levels. As a sensitivity test the modelling would provide an indication of the scale of the total adverse effects which would inform the Examining Authority and the JLAs and it is disappointing this is not being undertaken. While the Applicant states that there is insufficient time to complete the work the request for this information is not new. The JLAs requested this

after the PEIR and there has been ample time for the Applicant to undertake the work.

6.13 The Applicant is still to provide overflight mapping for all assessment years at an appropriate resolution and the JLAs ask that ExA require these for submission by D7.

6.14 The Applicant also detail in their response that "It is not considered necessary to assess sleep disturbance in relation to ground noise and air noise combined. Properties where maximum levels due to ground noise are predicted to be high enough to have the potential to cause awakenings have already been identified as having significant effects through assessment of the LAeq metric." The JLAs disagree and consider that the LAeq does not adequately reflect the effects of event based metrics. This is understating the potential health effects.

6.15 Against JLA item 6 and the use of BS4142 for ground noise the JLAs note the Applicant's response that references BS 4142 is clearly regarding ground noise and makes no reference to *fixed* ground noise sources. The JLAs would accept this was written in error and would welcome the Applicant's confirmation that this is the case.

6.16 Against JLA item 7, the Applicant has explained how it has considered other ambient noise sources in the assessment of ground noise by reference to material in ES Chapter 14: Noise and Vibration [APP-039]. However, Figure 14.6.33 and Figure 14.6.44 **[APP-039]** do not provide the level of detail required to identify the level of road traffic noise at sensitive receptors in the ground noise assessment. The mapping does not contain enough detail to identify sensitive receptors so it is impossible to tell what kind of noise levels they may experience. As each sensitive receptor is likely to experience different levels of road traffic noise and ground noise, it would be helpful if the Applicant could provide a table showing 2018 baseline road traffic noise levels compared against ground noise levels at all receptor locations to determine the relevance of road traffic noise when assessing ground noise.

6.17 By reference to item 8 and the request for ground noise contours the Applicant has given reasons why it will not provide the contours. The ground noise contours are not adequate for understanding noise sources at the airport, how they are mitigated and how noise affects sensitive receptors. The ground noise assessment is NOT restricted to the SOAEL contours but covers the change in ground noise at receptors within the ground noise study area, which is illustrated in Figure 14.4.2 **[APP-063]**. Ground noise contours should be presented within the study area in 3 dB increments from 51 dB daytime and 45 dB night-time. Additionally, it would be helpful if 'change in ground noise' contours are provided so impacts are illustrated. The JLAs dismiss the reason given that ISO 9613-2 does not present accuracy

beyond 1,000m. The ground noise assessment is underpinned by predictions at receptors beyond 1,000m there is no reason why these predictions cannot be illustrated as contours.

6.18 The JLAs welcome that the Applicant has now provided some details of fire training area noise emissions to confirm that there would be no noise impact.

6.19 Item 9. Refers to the assessment of the impact of engine testing. The Applicant discusses result of ground noise monitoring but has not provided the results. It would be helpful if the Applicant could provide these noise monitoring result as a time-history plot and summarized for different engine settings and periods in a table.

6.20 It is not accepted that the information provided by the Applicant demonstrates that the contribution of ground noise to the LAeq,16h is not significant. Table 6.2.3 **[APP-173]** identifies an LAmax level of 80 dB at St. Michaels & All Angels Church, which lasts for 2 minutes. Assuming flight idle is 5dB lower and lasts for 11 minutes, the total LAeq,16h for a 13-minute events is 58 dB. The engine ground run event will clearly contribute to LAeq,16h noise levels at St. Michaels & All Angels Church, which range from 60 to 64 dB LAeq,16h in Table 5.4.2 **[APP-173]**.

6.21 Another example can be provided for Westfield Place. Table 6.2.3 **[APP-173]** identifies an LAmax level of 79 dB which according to the calculation above, give an LAeq,16h of 57 dB. Ground noise levels range from 47 dB LAeq,16h for 26 runway operations and 64 dB LAeq,16h for 08 runway operations. Clearly, if engine ground runs take place at the western end of the Juliet runway during 08 operations the ground run would have an influence on LAeq,16h noise levels at Westfield Place.

6.22 Based on this analysis, the JLAs retain their position that the ground noise assessment needs more work.

6.23 Against item 14 concerning the Environmental Noise Guidelines and more recent work, the Applicant cites work that is superseded by the work that the JLAs have cited and comments therein rebutted by the panel responsible for the Environmental Noise Guidelines 2018. As such the JLAs are confused as to why the Applicant has chosen to refer to it.

6.24 In essence the JLAs are disappointed in the Applicant's response and consider that the JLA comments remain valid and are not undermined by the Applicant's statements and approach except to the extent that the Examining Authority, Joint Local Authorities, Interested Parties and the Secretary of State will not have the information available to consider the matters raised.

6.25 NV.1.7 Non Residential Receptors. The JLAs continue to have concerns about the way non-residential receptors are treated. We note that the Applicant has referred to the approximately 26,000 residential receptors within this work but this is out of scope and we do not comment further on that here. We ask the Applicant to explain:

- Why only schools are considered to be more sensitive to smaller changes in noise at levels above 63dB LAeq,16h?
- How their schools criteria accounts for LA01,30min noise, as per BB93 guidance?
- Whether all non residential receptors within relevant screening criteria were considered on a case by case basis?

6.26 NV.1.8 Description and Character of Aviation Noise. The Applicant has provided clarification of how source data was applied in the ground noise model. However, the information on air noise model validation provided in **[REP3-073]** is for the B738 only and is not sufficient to provide an understanding of aircraft noise levels that underpin the noise contours. There are a substantial number of aircraft that contribute to noise contours. The JLAs have consistently requested baseline SEL/LAmax baseline data for individual aircraft variants at each monitoring location since submission of the PEIR and the Applicant has consistently declined to provide the requested information. The JLAs would urge the Examining Authority to request the Applicant provide this information as it is important for understanding how individual aircraft types contribute to noise contours and how changes to the fleet can affect noise contour areas.

6.27 NV.1.9 Noise Envelopes. The JLAs have set out their comments elsewhere about the adequacy of the process of the development of the noise envelope and that it changed little between inception and finalisation. The Applicant has asserted that the JLAs did not engage in this process. Contrary to submissions made by the Applicant, the JLAs did offer views on the noise envelope but there was an expectation, as a result of comments by Gatwick, that there would be separate meetings with the JLAs.

6.28 Notwithstanding the JLAs disputed the Applicant's interpretation that the sharing the benefit was a simple cost benefit analysis and that their approach disproportionately assigned benefit to the UK economy at the expense of the local community. The JLAs took the view that premise was contrary to the ICAO Balanced Approach and UK aviation policy.

6.29 The JLAs went further to propose a method to determine how sharing the benefit could be derived. The proposal was to model the 2019 movements using the projected fleet technology that would be expected in 2029. It was suggested that the noise envelope could be calculated at 50% of the difference between the 2019 actual noise

levels with existing fleet and movements with the 2019 ATMS using 2029 fleet technology.

6.30 This was raised repeatedly by the JLAs at the Noise Envelope Group but the Applicant declined to explore the proposal, including conducting the necessary research or making information accessible to the JLAs that would allow it to explore this and other matters.

6.31 The Applicant also dismissed community group discussions and then referred to the Bristol proposal, however the JLAs commented that as a much smaller airport and being very different in scale and operation the impacts and benefit attributed to Gatwick may not be correct. This was especially true given one of the local priorities for communities was protection of the night period.

6.32 Following the publication of the Overarching Aviation Noise Policy the Applicant also withdrew reference to sharing the benefit and the Applicant would not entertain further discussion on it despite the JLAs and the community groups objections. The Applicant's ES Chapter 14 - [APP-039 /para14.2.44] states that "Reference to Sharing the Benefits of aircraft noise emission reduction has been removed. We consulted on sharing the benefits through our Noise Envelope Group in summer 2022 (see ES Appendix 14.9.8: The Noise Envelope Group Output Report (Doc Ref 5.3) and ES Appendix 14.9.9: Report on Engagement on the Noise Envelope (Doc Ref 5.3), and this ES does not provide further material on sharing the benefits.

6.33 The JLAs ask the Examining Authority to question the Applicant on this matter. Namely for the Applicant to confirm whether it considers that the Sharing the benefit still applies; clearly demonstrate how it has taken this into account in the process and confirm in practice what benefit is being shared with the local community for all assessment years as this is fundamental to the consideration of this proposal.

6.34 The JLAs note that the Applicant announced changes to the noise envelope at ISH8 based on revisions to the forecast fleet and the JLAs will comment further at D7. However, in the meantime, given the Applicant is adamant that the JLAs proposal involving forecast and operational measures and controls will not work, please can the Applicant provide a worked example of their own noise envelope proposal?

6.35 While the JLAs welcome the acknowledgement under point 11. "that the Applicant has submitted an Updated Central Case Aircraft Fleet Report which demonstrates why the pre-Pandemic Central Case forecast is now out of date, **why the Updated Central Case is now considered by the Applicant to represent the most likely rate of fleet transition**, and why the Slower Fleet Transition case remains valid, and in the Applicant's view continues to reasonably represent the potential for global and market events to slow the rate of fleet

transition" and further comments at ISH8 the JLAs continue to be of the view that the most likely rate of fleet transition is the central case.

6.36 NV.1.10 Noise Envelopes. The JLAs concerns are noted separately as is the Applicant's response.

6.37 NV.1.11 Other Controls. The Applicant has referred to NV.1.3 and suggested that if JLAs wish to challenge government policy they should do so directly with DfT and not through this DCO examination. The JLAs are not seeking to challenge any Government policy but to ensure that all government policy and UK legislation is complied with. This includes having a noise envelope that fulfils aviation policy and national planning policy requirements.

6.38 NV.1.12 Avoidance of Significant Effects. through noise insulation scheme. The Applicant has not demonstrated that they have relied on any evidence to show that significant effects caused by aircraft noise are avoided through the noise insulation scheme. This includes managing exposure to noise as well as dealing with the issue of overheating and ventilation. The JLAs have provided separate detailed comments in Deadline 5 Submission - Comments on any further information/ submissions received by Deadline 4 [REP5-094].

6.39 NV.1.13 Why has the Applicant only set a nighttime aviation noise threshold (55 dB) for the NIS inner zone? We note the Applicant response "The Applicant has demonstrated that the whole range of noise management activities at the airport are consistent with the ICAO balanced approach and the requirement in Regulation 598 to consider all measures before proposing a new measure that may be an operating restriction is met ES Appendix 14.9.5: Air Noise Envelope Background [APP175]."

6.40 The Applicant has made no provision to take into consideration the specific effects of night noise below 55 LAeq and this is considered to be a failing of the scheme. The Applicant relies on mitigation that is intended to deal with daytime outer zone to provide mitigation for an effect that occurs at night and the Applicant and may require a different solution to that proposed by the Applicant.

6.41 The JLAs remain of the view that the one additional aircraft noise induced awakening per night (as an average across the 92 summer night) is a SOAEL and that insulation should be made available where this value is exceeded. There may be properties already above this level. The additional effect of the NRP is likely to increase the impact and not reduce it.

6.42 NV.1.14 Timing of NIS Opening. The JLAs maintain their position that the Applicant needs to undertake a market feasibility study to identify how long it would take for properties in the Inner Zone and the Outer Zone to be insulated to ensure that effects are avoided and minimised.

6.43 The ExA is requested to ask the Applicant to provide this information.

6.44 NV.1.15 Eligibility Due to Total Aviation Noise - 10.56 The Applicant has declined to comment referring to its response to NV.1.5 in relation to ground noise modelling. The JLA's have repeatedly sought to have this matter addressed and suggest the Examining Authority asks the Applicant to provide an assessment that models all sources of ground noise for a reasonable worst-case day and provides suitable assessment criteria for identifying likely significant effects.

6.45 NV.1.16 NIS Promotion. The Applicant refers to it in ES Appendix 14.9.10: Noise Insultation Scheme Version 2 [REP4-017] submitted at Deadline 4 that has been commented on by the JLAs at deadline 5. A written response is awaited to the JLAs comments.

6.46 NV.1.17 Procedures for Required Acoustic Performance to be maintained. The JLAS have provided a separate note on this.

6.47 NV.1.18 Schools NIS. The JLAs have concerns over the schools NIS (see comments above) but also highlight that The JLAs would like to see the Applicant take a more pro-active position with regards to provision of noise insulation to schools and encourage schools to apply through making initial communication rather than only responding to schools that are concerned about noise (paragraph 5.1.1 [REP4-017]

6.48 NV.1.19 Nurseries and pre-school. This is being considered with the wider scheme.

6.49 NV.1.20 Construction Noise and Vibration. The Applicant offers no new information. As a specific point Paragraph 14.9.50 of Chapter 14 [APP-039] identifies four construction noise barriers that are used to reduce significant noise effects. Can the Applicant please identify where these barriers are secured in the Code of Construction Practice [REP4-007]. If the barriers are not secures, they cannot be relied upon in Chapter 14 [APP-039] as mitigation.

Summary of suggested detail required for future submission by the Applicant regarding Noise Issues:

ID	Topic	Action
JLAD6N01Ap	Documentation	All ES Chapter 14 documentation (including Appendices) should be updated to reflect all changes and amendments by D7. A clean and tracked version of each amended document is to be provided.
JLAD6N02Ap	Replacement Noise Bund (NV.1.1)	Provide full engineering option appraisal of replacement bunds that achieve the same mitigation performance as the existing bund.
JLAD6N03Ap	Replacement Noise Bund (NV.1.2)	Identify any temporary likely significant increase noise effects at all potentially affected receptors for the period when no

		barrier is in place . during the construction of works 18.
JLAD6N04Ap	Replacement Noise Bund (NV.1.2)	The Applicant to commit to no engine ground running at the western end of the Juliet runway when there is no bund/ barrier in place.
JLAD6N05Ap	Sensitivity Test for Total Aviation Noise (NV.1.5.)	To provide sensitivity modelling to the WHO standards and overflight mapping for all assessment years.
JLAD6N06Ap	Sensitivity Test for Total Aviation Noise (NV.1.5.)	To provide an assessment of the combined effect of air noise and ground noise on sleep disturbance using, amongst other things, additional awakenings (not Leqs).
JLAD6N07Ap	Sensitivity Test for Total Aviation Noise (NV.1.5.) (item 7)	To provide material with the appropriate level of detail to allow interpretation; and table showing 2018 baseline road traffic noise levels compared against ground noise levels at all receptor locations.
JLAD6N08Ap	Sensitivity Test for Total Aviation Noise (NV.1.5.) (item 8)	To provide: a)ground noise contours in 3dB increments from 51dB daytime and 45dB night-time for all assessment years. b) Change in ground noise contours.
JLAD6N08Ap	Sensitivity Test for Total Aviation Noise (NV.1.5.) (item 9)	To provide the engine ground run noise monitoring results as a time-history plot with a summary showing measured noise levels for different engine settings and the duration of time spent at each engine setting in a table.
JLAD6N09Ap	Non Residential Receptors (NV.1.7)	To confirm: a) Why only schools are considered to be more sensitive to smaller changes in noise at levels above 63dB LAeq,16h? b) How their schools criteria accounts for LA01,30min noise, as per BB93 guidance? c) Whether all non residential receptors within relevant screening criteria were considered on a case by case basis ?
JLAD6N10Ap	Description and Character of Aviation Noise (NV.1.8)	To provide full details of air noise validation including but not exclusively the baseline SEL and LAmax data for individual aircraft variants at each monitoring location.
JLAD6N11Ap	Avoidance of significant effects (NV.1.12)	To state where, in the application document, the Applicant has taken into consideration night noise effects below 55 dB LAeq8h.

JLAD6N12Ap	Timing of NIS Opening (NV.1.14)	To provide a market feasibility study to identify how long it would take for properties in the Inner Zone and the Outer Zone to be insulated to ensure that effects are avoided and minimised.
JLAD6N13Ap	Eligibility Due to Total Aviation Noise (NV.1.15)	To provide an assessment that models all sources of ground noise for a reasonable worst-case day and provides suitable assessment criteria for identifying likely significant effects.
JLAD6N14Ap	Schools NIS (NV.1.18)	To update the NIS demonstrating the Applicant will take a more proactive approach.

For the Examining Authority

ID	Topic	Action
JLAD6N01ExA	General	Consider requesting information specifically at ExQ2 where it is not supplied.
JLAD6N02ExA	Documentation	Ensure the Applicant submits fully updated Chapter 14 documentation at D7

7. [REP5-075] 10.38 Appendix C - Response to Comments on the oCTMP at Deadline 4 Version 1

Air Quality

General

7.1 The Applicant has not responded in REP5-075 to the Authorities' concerns raised at Deadline 4 (REP4 -042, paras 2.28-2.33) on Construction Traffic Emissions.

Construction Traffic Emissions:

Contingency Access Routes

7.2 The Applicant has not responded in REP5-075 to the Authorities' concerns raised on Contingency Access Routes at Deadline 4 (REP4 -042, paras 2.28-2.29).

7.3 The Authorities have repeatedly raised concerns that the CTMP lacks detail on how contingency routes from J10 M23 through Crawley's AQMA would be activated, monitored, communicated, regulated and mitigated.

7.4 The Applicant should provide adequate information on this mitigation measure at the Examination for consideration by IPs which sets out the Applicant's clear commitments to measures, including a framework which defines criteria or thresholds to limit, control, monitor and ensure compliance for the use of contingency routes.

7.5 This information is needed to provide greater certainty on what measures will be undertaken and provide evidence of how they will be used to restrict, monitor and regulate contingency access.

7.6 The Authorities note that similar concerns were raised by National Highways (Table ref 6.3.1 REP5-075)

Construction Traffic Emissions Monitoring

7.7 The Authorities have repeatedly raised concerns that the oCTMP lacks detail and commitment to measures for reducing and monitoring traffic emissions. However, the Applicant has not responded in REP5-075 to the Authorities' concerns raised at Deadline 4 (REP4 -042, paras 2.28-2.29) which also signpost concerns about monitoring raised at Deadline 3 (REP3-117 and REP3-133).

7.8 However, in its responses elsewhere (REP5-073 A.35 CTMP Monitoring**)** the Applicant, refers to measures outlined in its Draft AQAP for measures and monitoring commitments related to the construction phase. However, the dAQAP simply refers back to the CTMP and CWTP without giving any further detail. This circular referencing is not helpful and provides no certainty or commitment.

7.9 The Applicant states in the oCTMP: that a robust monitoring system will be detailed in the CTMP, without demonstrating how this monitoring commitment will be met, both in terms of monitoring construction traffic on restricted and contingency routes and monitoring traffic emission impacts along these routes. Specific measures to limit, control, monitor and ensure compliance with set thresholds are necessary to provide evidence that this "robust monitoring system" will function as the effective mitigation measure it is being presented as.

Non-Road Mobile Machinery (NRMM) Emissions

7.10 The Applicant has not responded in REP5-075 to the Authorities' specific points raised on Non-Road Mobile Machinery (NRMM) Emissions (REP4 -042, paras 2.31-2.33).

7.11 At ISH7 (Part 3, from 25:40) the Applicant confirmed that NRMM equipment would meet stage V of the London Non-Road Mobile Machinery standards. However, in its updated CoCP and oCTMP it only states that Stage V will be required from 2030.

7.12 The oCTMP and CoCP should be amended to accurately reflect the Stage V wording that was committed to at ISH7.

8. [REP5-077] 10.38 Appendix E - Response to York Aviation's Deadline 4 Submission Version 1[REP5-081] 10.40 Response to Rule 17 Letter - Future Baseline Sensitivity Analysis Version 1

8.1 Please see Appendix IV – Gatwick North Runway Project - Response to the Applicant's REP5-077, York Aviation June 2024

9. [REP5-079] 10.38 Appendix G - Response to the JLAs' Comments at Deadline 4 on the Noise and Vibration Technical Notes Version

9.1 The JLAs have considered the responses from the Applicant. In many cases the responses are the same as those submitted against REP5-072 considered elsewhere within this document.

9.2 By means of introduction to this section the JLAs highlight that

- they are largely in disagreement with the Applicant particularly about the approach to the assessment of ground noise.
- That data which has been reasonably requested by the JLAs has been denied.
- Not all assessment scenarios have been modelled that should have been
- The ES Chapter 14 and associated documents all need to be fully updated.

9.3 Responding in turn specifically to each of the referenced points:

9.3.1 **JLA-NVTN-B1 Consideration of all ground noise.** Notwithstanding the general concerns about the adequacy of the ground noise modelling and presentation, the JLAs requested that the Applicant assess all sources of ground noise. This includes engine testing. The JLAs disagree with the Applicant's assumptions and assertions about this as a being relatively short duration noise source The Applicant identifies in their response to JLA-NVTN-E5 that engine testing lasts for 30-60 minutes, during which, substantial levels of noise are generated. As such, engine testing would contribute to LAeq,T noise levels at receptors.

9.3.2 **JLA- NVTN-B2 -request for updated version of Appendix 14.9.3.** The Applicant has refused this request and the JLAs disagree with the reasons given and do not consider that there is a clear account of ground noise effects.

9.3.3 **JLA-NVTN-B3. Ground noise contours are not adequate.** The Applicant has said that the ground noise contours cannot be modelled. The ground noise contours are not adequate for understanding noise sources at the airport, how they are mitigated and how noise affects sensitive receptors. The ground noise assessment is not restricted to the SOAEL contours but covers the change in ground noise at receptors within the ground noise study area, which is illustrated in Figure 14.4.2 **[APP-063]**. Ground noise contours should be presented within the study area in 3 dB increments from 51 dB daytime and 45 dB night-time. Additionally, it would be helpful if 'change in ground noise' contours are provided so impacts are illustrated. The JLAs dismiss the reason given that ISO 9613-2 does not present accuracy beyond 1,000m. The ground noise assessment is

underpinned by predictions at receptors beyond 1,000m there is no reason why these predictions cannot be illustrated as contours.

9.3.4 **Ground noise contours for all assessments should be provided.** The Applicant has declined stating that the slower transition fleet contours are considered to represent the worst case. The JLAs disagree that the 2032 slower transition contours represent a worst-case. 2047 clearly provides the highest levels of ground noise at receptors and also the largest increases in noise (Table 9 and Table 10 **[REP3-071]**). It is important to assessment all assessment scenarios so temporal effects can be identified.

9.3.5 Action: See JLAD6N08Ap above.

9.3.6 **JLA- NVTN-B3 Changes in sound level within or resulting exceedance of SOAEL -** The Applicant has provided clarification and the JLAs ask the Applicant to identify how many receptors will experience noise levels newly above SOAEL for *all* assessment scenarios.

9.3.7 **JLA-NVTN-B4 Requests an update to documentation to aid interpretation.** The JLAs note Figure 14.6.33 and Figure 14.6.44 **[APP-039]** do not provide the level of detail required to identify the level of road traffic noise at sensitive receptors in the ground noise assessment. The mapping does not contain enough detail to identify sensitive receptors so it is impossible to tell what kind of noise levels they may experience. As each sensitive receptor is likely to experience different levels of road traffic noise and ground noise, it would be helpful if the Applicant could provide a table showing 2018 baseline road traffic noise levels compared against ground noise levels at all receptor locations to determine the relevance of road traffic noise when assessing ground noise.

9.3.8 Action: See JLAD6N07Ap above.

9.3.9 **JLA- NVTN-B5 reference to noise complaints -** The Applicant has partially quoted the paragraph 3.1.4 and the JLAs consider that to avoid confusion references to complaints should be removed as they are potentially misleading.

9.3.10 **JLA-NVTN-B7 Further example of need to update documentation.** See JLA- NVTN-B2.

9.3.11 **JLA-NVTN-B8. Use of "protected".** The Applicant has proposed an acceptable amendment to "screened".

9.3.12 **JLA-NVTN-B9. Acoustic character of ground and road traffic noise**. The JLAs are still not satisfied that the Applicant is being consistent with their explanation by reference to paragraph 5.1.1 **[REP3-071]** – "…*the ground noise assessment considers ambient noise because ground noise is generated on the ground, and is a more continuous noise source similar in nature to road traffic noise".* This is

contrary to the response to JLA-NVTN-B1. Can the Applicant explain this ?

9.3.13 **JLA-NVTN- B10 (and JLA-NVTN- C2) Noise Barrier A23 Riverside Park.** The JLAs note the Applicant's comments but are of the opinion the A23 Riverside Park barrier would provide substantial benefits for properties experiencing levels of road traffic noise exceeding the SOAEL and should be reinstated.

9.3.14 **JLA-NVTN- C3.** The explanations are noted and welcomed

9.3.15 **JLA-NVTN- D1**. The explanation is noted and accepted

9.3.16 **JLA-NVTN-E2 Aircraft sound power levels.** The sound power levels that were requested have not been provided either in this point or JLA-NVTN-E5

9.3.17 **JLA-NVTN-E3 Intention to use replacement locations to Juliet Taxiway wherever possible.** The JLAs requested that this is a commitment rather than an intention. The Applicant's prefers not. The JLAs acknowledge that flexibility is required but require commitments that operations at the airport will not normally be substantially different from assumptions that underpin the ground noise assessment.

9.3.18 **JLA-NVTN-E4. Justification for not using LAeq,T for EGRs.** As the Applicant identifies in their response to JLA-NVTN-E5, engine ground running can last for as long as 60-minutes and is clearly different than an air noise event that lasts for a short period of time. As such, engine ground runs should be assessed using the LAeq,T metric.

9.3.19 **JLA-NVTN-E5. Engine Ground Running.** The Applicant discusses result of ground noise monitoring but has not provided the results. It would be helpful if the Applicant could provide these noise monitoring result as a time-history plot and summarized for different engine settings and periods in a table.

9.3.20 It is not accepted that the information provided by the Applicant demonstrates that the contribution of ground noise to the LAeq,16h is not significant. Table 6.2.3 **[APP-173]** identifies an LAmax level of 80 dB at St. Michaels & All Angels Church, which lasts for 2 minutes. Assuming flight idle is 5dB lower and lasts for 11 minutes, the total LAeq,16h for a 13-minute events is 58 dB. The engine ground run event will clearly contribute to LAeq,16h noise levels at St. Michaels & All Angels Church, which range from 60 to 64 dB LAeq,16h in Table 5.4.2 **[APP-173]**.

9.3.21 Another example can be provided for Westfield Place. Table 6.2.3 **[APP-173]** identifies an LAmax level of 79 dB which according to the calculation above, give an LAeq,16h of 57 dB. Ground noise levels range from 47 dB LAeq,16h for 26 runway operations and 64 dB LAeq,16h for 08 runway operations. Clearly, if engine ground runs take

place at the western end of the Juliet runway during 08 operations the ground run would have an influence on LAeq,16h noise levels at Westfield Place.Based on this analysis, the JLAs retain their position that the ground noise assessment needs more work.

9.3.22 **JLA-NVTN-E6. Ground Running Assessment Not Fit For Purpose.** The Applicant states that for reasons given they do not consider it necessary to update their ground model. However, the JLAs consider that sufficient information has been provided in JLA-NVTN-E5 to provide that the ground noise assessment is deficient.

9.3.23 **JLA-NVTN-F1. Slower Transition Case vs Central Case.** The inconsistency in fleet composition assumptions between the central case and the slower transition case along with the lack of transparency is disappointing. The JLAs note that the updated central case fleet **[REP4-004]** now has a fleet composition similar to the slower transition case, which results in a larger contour area. The JLAs have commented on this document separately. We understand, from ISH8, that the Applicant is now adopting the revised central case fleet as its slow transition case hence it is important that consistent assumptions within the new generation fleet are applied. The JLAs do not understand why the updated fleet mix case assumes a higher proportion of slightly noisier Boeing aircraft in the mix. This needs to be better explained and reconciled to the original central case assumptions.

9.3.24 In relation to the JLAs' requests for that the Applicant provide details of their validation process along with SEL/LAmax baseline data for individual aircraft variants at each monitoring location the Applicant refers to a sample of data having been provided to demonstrate the model and validation process.

9.3.25 The information provided in **[REP3-073]** is for the B738 only and is not sufficient to provide an understanding of aircraft noise levels that underpin the noise contours. There are a substantial number of aircraft that contribute to noise contours. The JLAs have consistently requested baseline SEL/LAmax baseline data for individual aircraft variants at each monitoring location since submission of the PEIR and the Applicant has been consistently dismissive of this request. This information is important for understanding how individual aircraft types contribute to noise contours and how changes to the fleet can affect noise contour areas. It will aid understanding, transparency, reproducibility and assist in setting appropriate controls.
Action: (See JLAD6N10Ap).

Summary of suggested detail required for future submission by the Applicant regarding Noise Issues:

ID	Topic	Action
JLAD6N15Ap	JLA- NVTN-B3 Changes in sound	to identify how many receptors will experience noise levels newly above SOAEL for *all* assessment scenarios.

	level within or resulting exceedance of SOAEL	
JLAD6N16Ap	JLA- NVTN-B5 reference to noise complaints	Remove reference to complaints as this is misleading.
JLAD6N17Ap	JLA-NVTN-B9. Acoustic character of ground and road traffic noise	Can the Applicant explain the apparently contradictory statements in the paragraph?
JLAD6N18Ap	JLA-NVTN-E2 Aircraft sound power levels	Please can the Applicant provide all aircraft sound power levels?
JLAD6N19Ap	JLA-NVTN-E3 Intention to use replacement locations to Juliet Taxiway wherever possible.	Amend intention not to use Juliet taxiway to a commitment
JLAD6N20Ap	JLA-NVTN-E4. Justification for not using LAeq,T for EGRs	Engine Ground Running included in ground noise assessment model on a LAeqT basis.

For the Examining Authority

ID	Topic	Action
JLAD6N03ExA	JLA-NVTN-E6. Ground Running Assessment	The Examining Authority to request the Applicant to update their ground noise assessment and address issues identified in **[REP1-068]** and **[REP1-097]**.

10. [REP5-081] Deadline 5 Submission - 10.40 Response to Rule 17 Letter - Future Baseline Sensitivity Analysis Version 1

10.1 In their Rule 17 Letter of 9th May 2024, the Examining Authority (ExA) asked for the Joint Local Authorities, through York Aviation, to suggest alternative airport growth forecasts to be used as a sensitivity analysis. Two separate forecasts were submitted, a low and high case. The York low case proposes a future baseline scenario of 56.8 mppa and 74.8 mppa with project case in 2047. Whilst the York high case scenario proposed a 60.5 mppa future baseline and a 80.2 mppa with

project case in 2047. These compare with the Applicant's forecasts of 67.2 mppa for the future baseline scenario and 80.2 mppa in the with project case. The Applicant has also put forward their own alternative sensitivity scenario. This consists of a future baseline of 60.1 mppa and a with project future year scenario of 75.3 mppa.

10.2 The Applicant has then assessed how the submitted Environmental Statement (ES) could be affected by the alternative growth scenarios. The scope of assessment includes all ES topics that could be affected by the operation of the airport. Specifically in relation to Traffic & Transport, the Future Baseline Sensitivity Analysis [REP5-081] assesses whether, and how, the future baseline sensitivity tests would result in different environmental outcomes, from those reported in ES Chapter 12: Traffic and Transport [REP3-016].

10.3 In the York Low scenario the difference in passenger numbers between the future baseline and with Project cases would increase by around 3% compared to that assessed in the core scenario and reported in ES Chapter 12: Traffic and Transport [REP3-016]. For the York Low scenario, the net change in flows between the future baseline and with Project cases increases by between 3% and 6%, however, the absolute traffic levels are lower than those assessed as part of the core scenario. This forecast increase, in the difference in passenger numbers, would lead to a corresponding increase in traffic flows. In the AM and PM peak hours the percentage change is forecast to be 4% which would result in additional 260 Passenger Car Unit (PCU) and 155 PCU in total in the AM1 (7-8am) and PM (16-18) peak hours respectively. Based on this information the Applicant concludes that the change would not alter the conclusions of ES Chapter 12: Traffic and Transport [REP3-016] in relation to effects on driver delay, severance, non-motorised user amenity and delay or those related to safety.

10.4 In relation to demand associated with the rail network, the York low scenario would lead small increases in seated load factors by up to 0.03. The increases in passenger numbers would also lead to an additional volume of passengers using Gatwick Airport station. The Applicant forecasts that this would be around 280 and 350 additional passengers in the AM and PM peak hours respectively, or around 5-6 people per minute. Despite these forecast increases the Applicant concludes that the level of increases are unlikely to result in a significantly increased effect on station crowding.

10.5 The York High scenario is forecast to increase the difference between future baseline and with Project cases by around 7% across the day and up to 10% in the morning and evening peak periods, compared to that in the core scenario. The York High scenario would increase the change in airport passenger demand (between future baseline and with Project scenarios) by 9% and 8% in the AM1 (7-8am) and PM (16-18) peak hours respectively. These percentage increases would equate to an additional 580 PCU and 330 PCU in total in the AM1 (7-8am) and PM (16-18) peak hours respectively. The Applicant

concludes that this change would not alter the effects related to severance, non-motorised user amenity and delay or safety which were presented in ES Chapter 12: Traffic and Transport [REP3-016].

10.6 In relation to driver delay, locations on the Strategic Road Network (SRN), which were previously identified as experiencing medium or high impacts, resulting from the Project would continue to do so. Elsewhere on the SRN where a low magnitude of impact was previously identified this could increase to a medium impact and therefore potentially to a worse effect on driver delay. However, the Applicant concludes that the likely overall effect related to driver delay across the network would remain minor adverse, as previously identified in the core scenario in ES Chapter 12: Traffic and Transport [REP3- 016].

10.7 With regards to the forecast increase in demand on the rail network, as a result of the York high scenario, the seated load factors would increase by a small amount and increases in passengers using Gatwick Airport railway station could lead to increased crowding in the station. This could lead to the effect on crowding changing from negligible, as previously reported, to minor adverse.

10.8 Overall, in relation to traffic and transport the Applicant concludes that none of the sensitivity test scenarios are likely to give rise to new or significantly different environmental effects, compared to those originally identified in ES Chapter 12: Traffic and Transport [REP3-016].

Air Quality

10.9 The provision of an air quality review of the Future Baseline Sensitivity Analysis is welcomed.

10.10 However, the first step of an air quality assessment is to determine an air quality study area, known as an affected road network (ARN). This is done by comparing the future baseline scenario against the future with development sensitivity test(s). In this case a series of ARNs should have been developed for 2029, 2032 and 2038:

Future Baseline vs York Low
Future Baseline vs York High; and
Future Baseline vs GAL Sensitivity

10.11 These would then be compared to the ARN for the relevant years of assessment against the ARN for the future baseline vs GAL DCO (i.e. ES Assessment).

10.12 The ES [APP-038] sets out the procedure for an air quality assessment to establish an ARN and this was undertaken for the ES (see paragraph 13.5.7), which includes comparing:

'a change of Light Duty Vehicle (LDV) flows of more than 100 Annual Average Daily Traffic (AADT) movements within or adjacent to an AQMA, or more than 500 AADT elsewhere;

a change of Heavy-Duty Vehicle (HDV) flows of more than 25 AADT movements within or adjacent to an AQMA, or more than 100 AADT elsewhere;

a change of 5m or more in the realignment of a road and the road is within an AQMA; or

the introduction or removal of a junction near relevant receptors which cause traffic to significantly change vehicle accelerate/decelerate, eg traffic lights, or roundabouts.'

10.13 Unfortunately, none of this has been done for the sensitivity tests, only a high level comparison of 2038 has been undertaken between the ES future and the York High baselines has been undertaken. This high level comparison just considers the percentage difference in 'total flows' between these future baseline scenarios. This is not appropriate for air quality which needs to consider air quality traffic criteria as listed above and the Applicant also compares the wrong scenarios (i.e. two future baselines and not future baseline vs future with development sensitivity test scenarios).

10.14 The reason actual changes in AADT need to be considered when determining air quality study areas is that looking only at percentage changes on roads can result in very different changes in traffic. For example a change of 0.5% on a motorway route may be a change of several thousand vehicles, whilst on a local road this could be less than 500 vehicles. The Applicant notes that in their comparison (paragraph 5.2.23) that the majority of changes in traffic are less than 0.5%, which as described above may amount to thousands of vehicles difference for more heavily trafficked routes across the study area which would potentially result in very different air quality study areas.

10.15 It should also be noted that the applicant has previously shown that they realise the importance of considering actual changes in traffic to understand air quality effects as demonstrated in REP5-068. It is therefore unclear why the Applicant has deviated from the approach taken in the ES and REP5-068.

10.16 In summary any conclusions presented in the sensitivity test by the Applicant cannot be relied upon for air quality.

10.17 An appropriate set of sensitivity test study ARNs should be established to allow a sensitivity test for air quality to be undertaken and compared to the ES.

APPENDIX I

Book 5

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Gatwick Airport Northern Runway Project

Environmental Statement

Appendix 5.3.2: Code of Construction Practice Annex 3 – Outline Construction Traffic Management Plan – Tracked Version

APFP Regulations 5(2)(a) **Infrastructure Planning (Applications: Prescribed Forms and Procedure) Regulations 2009**

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1 Executive Summary

1.1.1 This Outline Construction Traffic Management Plan (OCTMP) sets out the proposed approach for managing construction traffic during the construction of the Gatwick Airport Northern Runway Project (the Project). This document describes the road network surrounding the Airport, the proposed construction compound locations, suggested construction vehicle routes and other measures to reduce the impact of construction traffic on the environment, airport operations and the local community.

1.1.2 This outline plan describes the location and anticipated uses of the construction compounds and provides a summary of proposed access to these. The compounds and effective access to them will ensure efficient logistics and site support for the construction of the Project.

1.1.3 This outline plan identifies the preliminary proposed construction vehicle routes to the site to ensure the safe and efficient movement of construction vehicles delivering materials to the site while reducing disruption to local and Airport traffic. The plan ~~posits~~ imposes restrictions on the use of local roads for construction vehicle access, with exceptions for local suppliers, emergency cases and mandatory construction activities. The proposed primary access for construction vehicles is Junction 9 of the M23, leading to the South Terminal roundabout and North Terminal roundabout and then to the internal road network within the Airport. Junction 10 of the M23 is proposed as an alternative access point for resilience and contingency.

1.1.4 Alongside routeing, this plan outlines various measures to reduce the impact on local communities and traffic. These measures include adoption of contractor and vehicle standards, effective and sustainable delivery management and material procurement measures.

1.1.5 This plan outlines a comprehensive set of measures to effectively manage construction traffic and the transport of materials, in a manner which prioritises safety, sustainability and efficient logistics management. It aims to reduce traffic-related disruptions, reduce emissions, and ensure the safe and efficient movement of construction vehicles to and around the Airport. A detailed Construction Traffic Management Plan (CTMP(s)) will be produced ~~generally~~ substantially in accordance with this OCTMP in collaboration between GAL and its contractors prior to commencement, ~~with the approval of the relevant highway authority~~to be approved by Crawley Borough Council (in consultation with ~~the relevant planning authority where relevant~~West Sussex County Council, Surrey

County Council and National Highways on matters related to their function) under DCO Requirement 12. -

2 Introduction

2.1.1 The Project proposes alterations to the existing northern runway together with the development of a range of infrastructure and facilities to allow increased airport passenger numbers and aircraft operations (Chapter 5~~.2~~ of the ES).

2.1.2 The Project includes the following key components:

- amendments to the existing northern runway including repositioning its centreline 12 metres further north to enable dual runway operations;
- reconfiguration of taxiways;
- pier and stand alterations (including a proposed new pier);
- reconfiguration of other airfield facilities;
- extensions to the existing airport terminals (north and south);
- provision of additional hotel and office space;
- provision of reconfigured car parking, including new car parks;
- surface access (including highway) improvements;
- demolition and relocation of Central Area Recycling Enclosure (CARE) facility;
- water treatment facilities; and
- reconfiguration of existing utilities, including surface and foul water.

2.1.3 The purpose of the OCTMP is to set out the proposed routes for construction traffic to the various Project construction compounds arising from the authorised development and to identify measures to minimise the impact of these construction vehicles on the road network, including reducing environmental impact and complying with air quality standards, having regard to road safety risk, congestion and cost.

2.1.4 Construction traffic for the Project refers to the dedicated movement of vehicles and equipment that are essential during construction. The term includes the vehicles that transport construction materials, heavy equipment such as excavators, cranes, and bulldozers, and other specialised vehicles.

2.1.5 This OCTMP deals with construction vehicle traffic: Heavy Goods Vehicles (HGVs, over 7.5 tons) and Light Goods Vehicles (LGVs, between 3.5 tons and 7.5 tons) and small delivery vans. The accompanying ES Appendix 5.3.2: CoCP Annex 2 - Outline Construction Workforce Travel Plan [APP-084] ~~(Doc Ref 5.3)~~ deals with how the construction workforce travel to and from the construction sites.

3 Local Context

~~1.1.1~~3.1.1 Gatwick Airport is located in Crawley in West Sussex, southeast England, 29.5 miles south of Central London, and covers a total area of 674 hectares as shown in ~~Error! Reference source not found below.~~ **Figure 1 – Aerial view of Gatwick Airport.**

3.1.2 The Airport can be directly accessed from the M23 motorway at Junction 9. The typical journey time from Gatwick to the M25 via the M23 is less than ten minutes. National Highways' M23 Smart Motorway project opened in 2020 and added additional capacity to the strategic network serving the Airport at peak times.

3.1.3 The A23 passes the Airport to its east and north, connecting Brighton via Crawley, Redhill and Croydon to central London. The A23 connects with the A272 and A27 east - west routes, placing the whole of the south coast between Southampton and Folkestone within approximately 1 hour 20 minutes of the airport.

3.1.4 GAL has allocated funding in its Capital Investment Programme to improve the South and North Terminal roundabouts to cater for predicted growth (without the Project) over the coming years.

Figure 1 - Aerial view of Gatwick Airport

4 Aims of the Construction Traffic Management Plan

4.1.1 The measures outlined in this OCTMP to be developed in the subsequent CTMP(s) are designed in pursuit of the following aims as regards construction traffic movement. Measures related to construction worker travel are outlined in the **Outline Construction Workforce Travel Plan** [APP-084]. A Construction Workforce Travel Plan (s)will be submitted to and approved under DCO Requirement 13.

4.1.2 The overall objective of the OCTMP, to be implemented through the CTMP(s), is to ensure that vehicles transporting construction materials and or plant to and from the Sites are monitored and managed so as to:

- reduce emissions levels;
- limit noise impacts, reducing disturbance to residents;
- reduce safety risks related to construction for residents, users of the Airport including passengers and other road traffic users;
- reduce congestion caused by the increased number of vehicles over and above business as usual traffic; and
- reduce the impacts of wear and tear on road network infrastructure and dust from construction traffic.

4.1.3 The OCTMP outlines measures, which will be developed through the CTMP(s), in order to:

- adopt smarter ways of working based on best practice that reduce construction vehicle movements, or that reduce or eliminate trips ~~in~~ during peak periods for traffic on the local and strategic road networks serving Gatwick Airport thus reducing pressure on the surrounding road network;
- promote sustainable transport modes for construction to lower emissions and congestion, benefitting the local community;
- promote the use of more efficient and safer equipment for construction material delivery; and
- effectively manage the on-going development and delivery of construction traffic management throughout the construction stages.

4.1.4 A full CTMP(s) will be developed by GAL and its contractors ~~generally~~ substantially in accordance with this OCTMP. The detailed CTMP(s) will be developed post consent and will adhere to the principles and objectives of this OCTMP. Under DCO Requirement 12, the CTMP(s) must be submitted and approved by Crawley Borough

Council (in consultation with West Sussex County Council, Surrey County Council and National Highways on matters related to

their function) ~~before the~~prior to commencement of a part of the authorised development~~construction works~~. ~~The CTMP will be developed in consultation with and approved by the relevant highway authority (in consultation with the relevant planning authority where relevant).~~

5 Construction Logistics and Site Support

~~1.1.2~~5.1.1 The Project's indicative construction schedule showing key milestones and their anticipated timing is included in the **ES Chapter 5: Project Description** [REP1-016]. ~~(Doc Ref 5.1).~~ The DCO includes relevant controls on the carrying out of the Project so as to ensure that any traffic impacts are not more adverse than those assessed as part of the construction traffic assessments.

5.1.2 Several contractor compounds are planned for the development of the Project. The location of these sites are illustrated in orange in **Appendix A: NRP Temporary Compounds and Construction Vehicle (HGV) Access Routes** to this OCTMP:

- Main Contractor Compound (known as MA1): the main compound for the Project – includes offices, car parking, batching plants and lay down areas;
- Airfield Satellite Compound: required for most of the airfield works to the northwest of the airfield;
- Car Park Z Compound: used for staging and as a laydown area for the airside works;
- Car Park Y Compound: used for material re-processing from the airside works and at a later stage for surface access works;
- South Terminal Roundabout Contractor Compound: the main compound for surface access works;
- Longbridge Roundabout Contractor Compound: used for surface access improvement works at the Longbridge roundabout; and
- Car Park B Compound: used for the works at Airport Way Bridge over the A23 London to Brighton railway line.

5.1.3 Further detail on these compounds, as well as construction vehicle access to each, is provided in **ES Appendix 5.3.1: Buildability Report Part A** [REP2-013] ~~(Doc Ref 5.3~~) and will be further detailed (to the extent necessary) in the subsequent CTMP(s). A submission of the CTMP(s) will detail how the potential traffic impacts from construction traffic associated with the Project will be managed in order to ensure the safe and efficient operation of the road network and minimise any negative environmental and community impacts. Brief details of access to each compound are included in this section, with further information on construction routes in section 6.

Commented [SS1]: Does this list and appendix need to be updated to incorporate the Reed Bed Water Treatment Compound that was proposed via Project Change 3? Clarification should be provided that details the access routes o this compound and how it will be accessed. The status of the access route may also need to be amended. Should a compound be proposed in this location the status of Radford Road as an access route is changing from its current status of a Restricted Access route. If a compound is no longer being proposed in this location, the Applicant should explain which compound will be used to construct the Reed Bed Water Treatment system.

5.2 Main Contractor Compound – MA1

5.2.1 The Main Contractor Compound will be the central compound for both on campus and off campus works.

5.2.2 Two new accesses will be introduced on Perimeter Road East. The southernmost access will serve as the HGV access to the batch plant and material laydown areas. The security gate complex will be set back within the site to maximise the HGV stacking capacity on the internal access road in order to minimise the risk of blocking back onto Perimeter Road East. The route to the compound will be via M23 Junction 9 through the South Terminal roundabout, on to the North Terminal roundabout. Construction vehicles will then take the A23 south to the Gatwick Road roundabout and from there into the Main Contractor Compound.

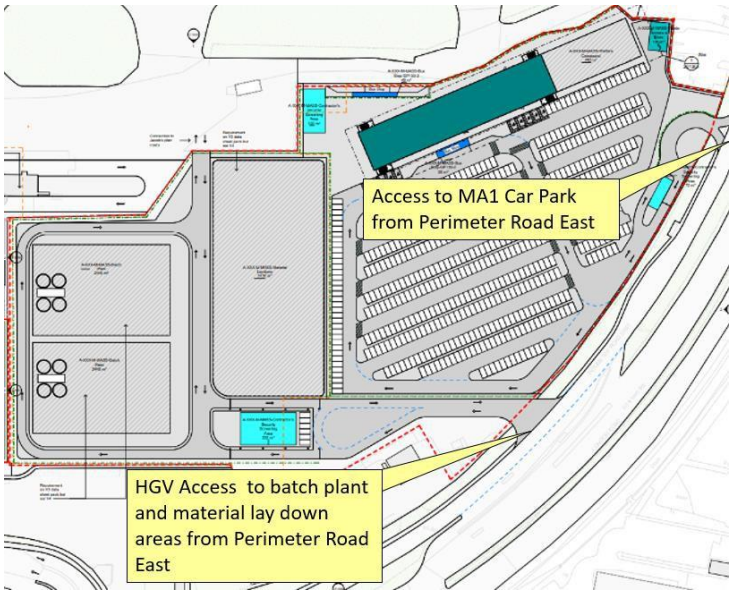


Figure 2 - : MA1 Compound - Perimeter Road East Access

5.3 Airfield Satellite Compound

5.3.1 The Airfield Satellite Compound, which will be used by the construction workforce and site supervision for airfield projects, is located to the west of Taxiway Uniform and south of Hangar 11. This facility is anticipated to be needed from the start of work until the airfield works are completed.

5.3.2 Access to the compound will be through the existing north-eastern entrance. Vehicles will be directed to Larkins Road, located west of Hangar 11. The route to the compound will be off Junction 9 M23, to North Terminal roundabout and Longbridge Way and onto Perimeter Road North to Larkins Road.

5.4 Car Park Z Compound

5.4.1 The Car Park Z Compound is situated at the southeast corner of the airfield. This compound will act as a staging area and laydown area for airside works. This facility is anticipated to be needed from the start of work until the airfield works are completed.

5.4.2 Access to the Car Park Z Compound will be via Perimeter Road East. The route to the compound will be via Junction 9 M23 through the South Terminal roundabout, on to the North Terminal roundabout. Construction vehicles will then take the A23 south to Gatwick Road roundabout and from there into Car Park Z Compound.

5.5 Car Park Y Compound

5.5.1 The Car Park Y Compound is located off the Northgate roundabout to the north of the Airport. This facility will be required until the airfield and surface access improvement works are completed.

5.5.2 Access to the Car Park Y Compound will be facilitated through a new access point located to the north of the compound from Perimeter Road North. This is being implemented to mitigate heavy traffic flows on the Longbridge roundabout for the hotel, operational traffic, and airport staff car park. To reach the compound, the access route will be through Junction 9 M23, the North Terminal roundabout and Perimeter Road North.

5.6 South Terminal Roundabout Contractor Compound

5.6.1 The South Terminal Roundabout Contractor Compound is located off Airport Way, adjacent to the South Terminal roundabout. Access to the site will be required from 2027 for the early works and utility diversions. The compound facility is anticipated to be needed from 2028 until completion of the Surface Access works.

~~5.6.2~~ Access to the compound will be through a new single main HGV entry point located on the South Terminal roundabout. ~~Construction workforce privately owned vehicles will also be able to access the site from a secondary entry point at Balcombe Road. This secondary access point will not be open to the public~~

Commented [MG2]: SCC are not prepared to accept a construction compound access onto Balcombe Road other than for active travel. All access (construction vehicles, delivery and workforce private vehicles) should be from the purpose built access off the South Terminal Roundabout, via the SRN. Active local travel can be provided for via a ped/cycle access off Balcombe Road. If this is provided, then Parking restrictions will be required on Balcombe Road as far north as existing regulations and south into West Sussex.

~~and the CTMP(s) will set out how public access is to be avoided (such as through signage).~~ The route to the compound will be via Junction 9 M23, followed by a turn onto the South Terminal roundabout. The CTMP(s) will detail how public access to the South Terminal Contractor Compound will be avoided, how safety relating to the access and egress of the compound will be managed and how the control measures of queuing traffic will be implemented. The compound access will be designed in accordance with the relevant standards,

5.7 Longbridge Roundabout Compound

5.7.1 The Longbridge Roundabout Compound is anticipated to be a small compound that will support the construction works at the Longbridge roundabout site access.

5.7.2 Access to the site will be through a new single main entry point located off~~n~~ the Longbridge roundabout, using either A23 London Road, Brighton Road or the A217. The access from the M23 will be through Junction 9 and A23 London Road.

Commented [MG3]: Current access proposals are not satisfactory as they do not prohibit right turning into the site across the A217 immediately north west of the Longbridge Roundabout. The access should be designed to facilitate left in and left out only, with uturns being undertaken at the two roundabouts either side of the access.

5.8 Car Park B Compound

5.8.1 The Car Park B Compound will be located on Car Park B during the widening works of the Airport Way bridge over the London to Brighton railway.

5.8.2 Access to this compound will be via the A23 and then the existing Station Approach Road. The access route from the M23 will be through Junction 9 and the A23.

6 Construction Vehicle Routes and Access

6.1.1 References to "access" in this document are to be construed as references to accessing and egressing, to and from the relevant construction works.

6.1.2 Off-Airport construction vehicle routing will be finalised in the detailed CTMP(s) to be developed by GAL in conjunction with its contractors (once appointed) and will be approved by ~~the relevant planning authority~~Crawley Borough Council (~~where appropriate,~~ following consultation with West Sussex County Council, Surrey County Council and National Highways on matters related to their function). This oCTMP details the indicative construction vehicle routing in Appendix A, to be confirmed and approved through the detailed CTMP(s).

6.1.3 The CTMP(s) will ensure that appropriate restrictions and / or prohibitions are implemented for construction traffic as described in sections 6.2 – 6.7 in respect

of sensitive routes and routes unsuitable for use by HGVs or LGVs. DCO Requirement 12 requires that the Project is constructed in accordance with the approved CTMP(s). Dedicated route signs will be set up on the M25, M23, A23 and Airport Way to indicate the approved routes direct to the Airport compounds sites for materials and plant. Specific routing will be provided for abnormal loads and will be detailed in the CTMP(s).

6.1.4 The CTMP(s) will set out the primary access routes, contingency access routes and the routes that, as far as is reasonably practicable, shall not be used by construction traffic, subject to the exceptions listed in section 6.4 (the restricted use access routes).

6.2 Primary Access

6.2.1 The Airport is surrounded by a network of roads and roundabouts that facilitate access. Construction vehicle access has been considered based on the traffic assessments, accessibility and impact on local traffic, with the aim of reducing disruption whilst maintaining efficient access to the construction compounds and work sites. ~~and Error! Reference source not found.~~**Appendix A: NRP Temporary Compounds and Construction Vehicle (HGV) Access Routes** provides a preliminary schematic representation and satellite view (respectively) of the construction traffic network, showing the anticipated primary construction access, secondary/alternative construction access (as resilience and contingency to the ~~main~~ primary route) and local roads where construction vehicle access is ~~anticipated~~ to be restricted or prohibited routes subject to exclusions listed in section 6.4. Such routes will be confirmed through the detailed CTMP(s).

6.2.2 Junction 9 of the M23 will be the main construction access point. From Junction 9, the M23 Spur leads directly to Airport Way, which serves as the entrance and exit to the airport via the South and North Terminal roundabouts. The construction traffic will use airport internal roads from the roundabouts (such as Perimeter Road and Larkins Road) to reach the worksites. These routes will be the ~~main~~ primary access for construction vehicles to the compounds and work sites. The details of these HGV routes are described below and illustrated on **Appendix A: NRP Temporary Compounds and Construction Vehicle (HGV) Access Routes.**

6.2.3 **M23 Junction 9 to Airside Satellite Compound:** From M23 Junction 9, the primary access route heads towards the M23 Spur Westbound, followed by South Terminal Roundabout (STR), then it takes Airport Way Westbound to North Terminal Roundabout (NTR). From NTR, the route proceeds onto

Longbridge Way and then to Longbridge Way Roundabout. It then takes Perimeter Road North and Larkins Road to the Airside Satellite Compound.

6.2.4 **Airside Satellite Compound to M23 Junction 9:** Starting at Larkins Road, the route moves along Perimeter Road N, then proceeds to Longbridge Way Roundabout and Longbridge Way. Next, it takes NTR and Airport Way Eastbound to STR, follows M23 Spur Eastbound and reaches M23 Junction 9.

6.2.5 **M23 Junction 9 to MA1 Compound:** Beginning at M23 Junction 9, the route uses M23 Spur Westbound and then STR. It then takes Airport Way Westbound to NTR, followed by Gatwick Way and Perimeter Road N. It continues onto A23 Southbound, moves to Gatwick Road Roundabout and then takes Perimeter Road East to arrive at MA1 Compound.

6.2.6 **MA1 Compound to M23 Junction 9:** The route starts at MA1 and follows Perimeter Road East. It then goes to Gatwick Road Roundabout, moves along A23 London Road Northbound and continues to NTR. From there, the route goes through Airport Way Eastbound, STR, M23 Spur Eastbound, and reaches M23 Junction 9.

6.2.7 **Airside Satellite Compound to MA1 Compound:** Beginning at Larkins Road, the route goes via Perimeter Road N to Longbridge Way Roundabout. From there, it goes through Northgate Road (through tunnel) and continues Perimeter Road North. It then goes along A23 London Road Southbound, moves to Gatwick Road Roundabout, and follows Perimeter Road East to arrive at MA1 Compound.

6.2.8 **MA1 Compound to Airside Satellite Compound**: The route starts at MA1, then takes Perimeter Road East to Gatwick Road Roundabout. It continues onto A23 London Road Northbound and NTR. Next, it takes Longbridge Way to Longbridge Way Roundabout and then goes along Perimeter Road N to Larkins Road leading to the Airside Compound.

6.3 Contingency Access

6.3.1 As a contingency for the above primary access and to ensure resilience, Junction 10 of the M23 may ~~could~~ be used as an alternative access. A23 London Road, A23 Brighton Road and the A2011 are other significant roads that provide connections to the airport for the construction traffic from the north and south, in the event that the primary access is impaired. This contingency route is shown in yellow on **Appendix A: NRP Temporary Compounds and Construction Vehicle (HGV) Access Routes**.

6.3.2 Further information on the situations in which is it envisaged that construction traffic would be authorised to use a contingency access will be provided in the CTMP(s).

Commented [SS4]: For the purposes of clarity, as has been done with the Local Roads (Restricted Access), it would assist if the situations the Contingency Access routes may be used was provided in the OCTMP.

6.4 Local Roads (Restricted Access)

6.4.1 The usage of local roads will be restricted for construction vehicle access to minimise disruption to local communities and traffic. These restrictions include all the residential roads around Gatwick Airport. The local roads which offer access to the Airport and which are subject to these restrictions are shown in light blue on **Appendix A: NRP Temporary Compounds and Construction Vehicle (HGV) Access Routes** to this OCTMP**.** This notwithstanding, it is anticipated that certain exceptions to this general approach will be provided where use of these roads is required, including:

- **local suppliers**: suppliers based within the local area may need to use these roads to deliver materials or services to the Project construction compounds and worksites. Allowing these entities to use local roads ensures that these local businesses can continue to operate effectively and contribute to the construction process;
- **emergency cases**: in situations that present immediate risk or danger to life or property, (such as a medical emergency) or a critical construction issue, construction vehicles may need to use local roads. This exception ensures that emergency services can respond as quickly as possible when necessary; and
- **construction activity happening on the local roads**: certain construction activities such as the replacement of structures (i.e., Balcombe Road Bridge) may require the use of local roads for the transport of heavy machinery, materials or personnel. In these instances, the use of local roads is essential to complete the construction tasks.

6.4.2 GAL will work closely with Crawley Borough Council, West Sussex Council, Surrey County Council and National Highways, in line with DCO Requirement 12, ~~the relevant planning authority (and National Highways as relevant~~ to carefully plan and manage construction traffic effectively. The CTMP(s) will identify in finer detail the local roads to which restrictions will apply and the nature of these restrictions. This process will ensure that construction vehicles avoid areas that may increase the traffic risk to vulnerable road users and the impact on local communities by limiting the volume of construction traffic that passes, for example, residential areas, schools, hospitals, community centres, sports facilities, transport hubs and cycle

routes. If construction traffic cannot be excluded from these routes all contractors will be made aware of these more sensitive locations, and the presence of more vulnerable road users in these areas.

6.5 Strategic Road Network

6.5.1 The CTMP(s) will take into account the relevant sections of the Strategic Road Network (SRN) and the construction impacts on the local roads in the immediate vicinity of the Project.

6.5.2 GAL must prepare a scheme of traffic management under Part 3 of Schedule 9 to the DCO to enable works relating to the Strategic Road Network to be undertaken safely and in such a way as to minimise the potential for disruption of the Strategic Road Network.

~~1.1.3~~6.5.3 GAL's contractors will work with National Highways in relation to CTMP(s) which may affect the Strategic Road Network in order to minimise disruption where possible and practicable, with due consideration of the wider impacts on the surrounding road network. In particular, the CTMP(s) (or schemes of traffic management, as relevant) will include monitoring of road traffic on both the local road network and SRN in the vicinity of Gatwick Airport sufficient to assess whether significantly greater impacts than those assessed as part of the DCO may occur and in such cases that localised junction modelling or assessment may be undertaken based on updated construction programmes and works. Where mitigation is identified as necessary or where measures can be taken to reduce the impacts on the Strategic Road Network so far as reasonably practicable without causing consequential and disproportionate impacts on the local road network, such measures should be set out in the CTMP(s).

6.5.4 The CTMP(s) will require regular construction traffic monitoring reports that describe and characterise the main traffic effects of the Project during its construction period, through comparison with the baseline. The programme of monitoring will be approved by Crawley Borough Council in consultation with West Sussex County Council, Surrey County Council and National Highways prior to commencement in accordance with DCO Requirement 12. The CTMP(s) will confirm that where the monitoring identifies unanticipated disruption or congestion, relevant GAL Contractors would support interventions and/or changes to traffic management measures required to mitigate and minimise disruption as far as is reasonably practicable, and would identify where continuous improvements could be implemented.

6.6 Restrictions and Monitoring

6.6.1 Construction vehicles involved in the Project will be required to adhere strictly to the ~~predetermined~~ identified routes (to be confirmed through the CTMP(S)), including routes on the strategic road network, to minimise impacts on the surrounding communities, including by traffic congestion and effects on air quality (in particular in hotspots such as Junction 10 M23 and Hazelwick Air Quality Management Area). Once finalised and approved through the CTMP(s), clear and specific instruction regarding the restricted routes will be communicated to all relevant contractors and members of the supply chain making deliveries.

6.6.2 ~~It is envisaged that a~~A robust monitoring system will be detailed in the CTMP(s) and implemented for the duration of the Project's construction to ensure that all construction vehicles adhere to the designated routes. Any deviations or non-compliance will be identified and addressed promptly, with corrective actions taken as necessary. The corrective actions will be developed with the traffic management working group.

6.6.3 The results of the monitoring process will be shared with ~~relevant stakeholders, including the relevant planning authority,~~C~~c~~rawley Borough Council, West Sussex County Council, Surrey County Council and National Highways (where relevant to their function) ensuring transparency and maintaining open lines of communication throughout the construction period. In the event of negative monitoring results, the CTMP(s) will provide for appropriate measures, such as imposing penalties, implementing additional controls or re-evaluating routes to prevent further non-compliance and mitigate the impacts on local residents and the safe operation of the road network.

6.7 Signage

6.7.1 Specific measures for signage will be ~~prepared as part of~~detailed in the CTMP(s). All designated approach routes for construction deliveries and personnel will be clearly identified. Temporary signage will be erected along construction traffic routes to provide access (directional) routeing information. The CTMP(s) will prescribe the temporary signage which must be in place before the commencement of construction works. These will be located to ensure that construction vehicles ~~and staff~~ are able to travel directly to site from the strategic road network. Signage will also be deployed as required to promote safety for the public and construction workforce during traffic management works and temporary traffic control measures, as well as near to access and egress points to the site. Any Signage proposals will be

subject to approval by the local highway authority. Where signage proposals relate to the Strategic Road

Network, in accordance with National Highways' protective provisions, an approval from National Highways will be required.

6.8 Safety Measures

6.8.1 The traffic management will be designated in accordance with the requirement of the 'Department for Transport Traffic Signs Manual and National Highways' 'Roadworks – A Customer View' which outlines the customer principles that should be applied to roadworks.

6.8.2 To protect the health, safety and security of road users and the workforce, traffic management will need to ensure that safety measures have been thoroughly considered.

6.8.3 In the event a road has to be closed for construction purposes and therefore requires traffic to be diverted, meetings would be held with the appropriate highway authority as part of the TMF to minimise disruption to road users and communities affected by the diversion.

6.8.4 Provision for potential emergency closure of certain roads will be discussed with the appropriate highways authority in the TMF.

6.8.5 For the purposes of protecting the workforce and the public, the CTMP(s) will secure appropriate traffic management measures, including narrow lanes, lanes closures, closures with diversions etc. These measures will introduce safe working zones (through the use of cones and/or safety barriers as appropriate) next to the carriageway as required by Chapter 8 of the Traffic Signs Manual (DfT) 2009.

6.8.6 A risk-based approach will be taken when choosing and implementing traffic management measures and access routes to compound areas. Where traffic signals or similar will be required to facilitate construction movements such as access to compounds and construction vehicle crossing points, they will be locally controlled to ensure that the Local and Strategic Roads have priority in terms of traffic movements. Additionally, when not required operationally the traffic signals will be turned off.

6.8.7 Safety measures may include traffic-signal controlled pedestrian crossing points, crossing patrols or similar and will be considered during production of the CTMP(s). This will be subject to approval by Crawley Borough Council in consultation with West Sussex County Council, Surrey County Council and National Highways (on matters related to their function) in line with DCO Requirement 12.

6.9 Traffic Management during Surface Access Improvements

6.9.1 The Project includes a series of surface access improvement works aimed at accommodating the anticipated increase in road traffic arising from the Project, notwithstanding an increase in the share of trips made using sustainable modes. The improvements include enhancements to Longbridge roundabout, reconfiguring the North Terminal roundabout, introducing a new flyover and new signalized junction connecting the North Terminal to the A23 London Road, grade separation of South Terminal roundabout and upgrading the Eastbound M23 Spur Road. The works will impact several roads, including the A23 Brighton Road, Longbridge Roundabout, A23 London Road, North Terminal roundabout, Airport Way, South Terminal roundabout and M23 Spur.

6.9.2 By the time the Surface Access Improvement works have been completed, Airport Way eastbound will have been replaced by a signalised junction from the North ~~Terminal Roundabout (~~NTR~~)~~ to A23 London Road. This replacement will result in alterations to the routes for construction traffic from those outlined above, notably in the provision of a right turn onto A23 London Road towards Airport Way to reduce the number of construction traffic movements using Longbridge Roundabout. Construction traffic routing during the construction of the Project's highway works and following their completion will be confirmed in the CTMP(s). ~~This replacement will result in alterations to the routes for construction traffic from those outlinabove and further details on replacement routes will be provided in the CTMP.~~

6.9.3 During the construction of these works, several traffic disruptions are expected. These disruptions may include partial or complete lane and, on rare occasions, full road closures. A buildability report specific to surface access improvement works has been prepared, giving indicative details on the approach to traffic management during these works. Please see Buildability Report Part B for further information.

6.9.4 The detailed CTMP(s) to be prepared by GAL and its contractors will detail measures to effectively monitor, manage construction-related traffic disruptions and on a continuous basis, identify measures to minimis~~z~~e the impact on residents, road users, and airport operations. Agreements will be in place through local authority land rental schemes before commencement of construction.

6.10 Engagement with Royal Mail

6.10.1.1. The detailed CTMP will confirm procedures to be followed by GAL and / or its contractors in engaging and notifying Royal Mail during the Project's construction on matters related to its services. These CTMP(s) procedures will include:

- Royal Mail will be informed of any proposed road closures or diversions required for the Surface Access Works, at least one month in advance of any closure or diversion.
- Royal Mail will be informed in advance of works that GAL will be undertaking on the local highways network, with particular regard to Royal Mail's distribution facilities within and near Gatwick Airport.
- Royal Mail will be given the opportunity to engage in appropriate stakeholder consultation group that are set up by GAL and / or its contractors with the Local Highways Authority and other major road users.

7 Measures to Reduce Impacts

7.1.1 In addition to routeing and restrictions on use of certain local roads by construction vehicles as described above, GAL has identified the below measures to further mitigate any potential impacts on the road network and local community from construction vehicles. These measures are described in outline and will be subject to further development in the subsequent CTMP(s). The measures are split into the following general categories and which are then discussed in further detail below:

- Contractor accreditation and standards;
- Delivery management;
- ~~M~~Material procurement measures; and
- ~~O~~Other measures.

7.2 Contractor Accreditation and Standards

7.2.1 GAL and its contractors will explore how existing accreditations, standards and initiatives can factor into the contracting process and the subsequent management of construction traffic. The following initiatives will be considered ~~and confirmed in the CTMP(s)~~:

7.3 Work Related Road Risk (WRRR)[1] Requirements

7.3.1 Implementation of WRRR requirements, a freight safety initiative aligned with the Mayor of London's Vision Zero approach to road danger reduction, which GAL will adopt as best practice.

7.3.2 Freight safety is a pressing issue and GAL will put road danger reduction at the heart of everything done on the Project, such that contractors should meet these higher road safety standards.

7.3.3 Further details on WRRR can be found on the Transport for London website at the link in Footnote 1.

7.4 Construction Logistics and Community Safety (CLOCS)[2]

7.4.1 The CLOCS standard draws together emerging practice from a number of individual standards, policies and codes of practice to form a single road risk standard. This common standard will be implemented by GAL's contractors and applied in a consistent way by fleet operators. It is a national scheme developed in collaboration between the construction sector and fleet operators.

7.4.2 The standard aims to ensure that construction companies follow safe practices in the management of their operations, vehicles, drivers and construction sites. Adherence to the CLOCS standard by contractors will be mandated by GAL.

7.4.3 Further details on CLOCS can be found at the link in Footnote 2.

7.4.4 Fleet Operator Recognition Scheme (FORS)[3]

7.4.5 FORS is a voluntary national fleet accreditation scheme designed to help improve fleet operator performance in key areas such as environmental performance, safety, and operational efficiency. Its purpose is to raise the level of quality within fleet operations and to recognise those operators that are achieving the environmental, safety and efficiency requirements of the FORS standard. Further details on the standard can be found at the link in Footnote 3.

7.4.6 There are progressive requirements for achieving FORS accreditation at bronze, silver, and gold levels. The FORS logo allows construction clients to readily distinguish FORS operators from other operators - it is also a mechanism by which adherence to the CLOCS standard above can be assured and monitored.

[1] https://tfl.gov.uk/info-for/deliveries-in-london/delivering-safely/work-related-road-risk

[2] https://www.clocs.org.uk/

[3] https://www.fors-online.org.uk/cms/

7.4.7 FORS accreditation confirms that a fleet operator can demonstrate that appropriate systems and policies exist to ensure drivers are suitably fit, qualified and licensed to operate vehicles which are properly maintained, equipped and insured.

7.4.8 Adherence to the FORS standard will be mandated for all supply chain fleet operators engaged to support the Project. Delivery management mechanisms will support the employment of FORS standards across the Contractor's supply chain, preventing the use of non-accredited vehicles.

7.5 HGV Direct Vision Standard

7.5.1 HGV blind spots have been shown to contribute to a large proportion of collisions with vulnerable road users. Research has shown that increased levels of direct vision - what a driver can see directly through the windows of the cab - can improve reaction times and reduce cognitive demand on the driver. TfL has developed a Direct Vision Standard (DVS) for HGVs which is part of the Mayor of London's Vision Zero plan[4] to eliminate all deaths and serious injuries on London's transport network by 2041.

7.5.2 The DVS is an objective, scientific measure of how much the HGV driver can see from their cab directly through windows, as opposed to indirectly through mirrors or camera monitoring systems. The DVS categorises vehicles using a star rating system based on how much of the area of greatest risk to vulnerable road users a driver can see.

7.5.3 The higher the star rating, the more a driver can directly see of this area. Three stars equate to a 'good' rating, while zero stars will be awarded to those HGVs considered 'not suitable for use in an urban environment' because of the significantly higher potential risk of collision they pose. It will be explored how this rating can factor into procurement processes.

7.6 Use of Low Emission Construction Plant and Fleet

7.6.1 Air pollution can be reduced by replacing construction vehicles on our roads with cleaner alternatives such as electric, hybrid, hydrogen, LPG, Euro 6 & 5 engines or by fitting emissions reduction equipment. ~~Low emission plant would be encouraged and used where practicable during construction of the Project to minimise any potential air quality effects~~.

[4] Vision Zero for London - Transport for London (tfl.gov.uk)

7.6.2 ~~T~~The **Code of Construction Practice** [REP4-007], secured by DCO Requirement 7, requires that:

- ~~-~~All on-road heavy vehicles will comply with the London Low Emission Zone (LEZ) requirements across all sites within the Order Limits for the relevant class of vehicle; and
- All non-road mobile machinery (with a net power 37kW to 560kW) will comply with the engine emissions standards set by London LEZ for Non-Road Mobile Machinery standards across all sites within the Order Limits. From 1 January 2025, NRMM used on any site will be required to meet emission standard Stage IV as a minimum. From 1 January 2030, NRMM used on any site will be required to meet emission standard Stage V as a minimum.

7.7 Delivery Management

7.7.1 The CMTP(s) will detail how deliveries to site will be coordinated and managed in order to reduce the use of the road network (particularly at ~~p~~peak times for the network in the vicinity of the Project) in order to reduce congestion, minimise the risk of accidents and improve the efficient operation of the site. This will seek to ~~reduce~~ mitigate the environmental impact on the surrounding area during the construction period in accordance with the assessment provided in the DCO.

7.7.2 The u~~U~~se of Delivery Management Zones will be considered in the production of the CTMP(s), as these allow materials to be delivered to specific locations away from sensitive areas and consolidated until deliveries are required, when they can be transported on fewer vehicles to their destination sites.

7.7.3 The u~~U~~se of a Delivery Management System (DMS) will also be explored through the production of the CTMP(s), as a system whereby deliveries to site will be scheduled through booking slots, ensuring that the flow of vehicles to and from the construction site is controlled. A DMS also provides surety of delivery for critical items, which protects the integrity of the build schedule and allows for accurate, efficient reporting of delivery activity. A DMS has the following uses:

7.8 Scheduling Deliveries

7.8.1 The DMS will help plan and schedule deliveries to avoid n~~N~~etwork peak ~~traffic~~ hours within the vicinity of the project and prevent unnecessary congestion on public roads around the construction sites where reasonable and practicable. This will avoid unnecessary queueing, idling and noise from vehicles and will reduce the impact on local traffic and airport operations by optimising delivery

times.

7.8.2 The DMS will plan and schedule deliveries to avoid, where possible, construction deliveries using routes that go past local schools at peak times, such as the school drop off and pick up times. The CTMP will also set out measures to address the early arrival of vehicles, to enable them to avoid travelling to the site at peak hours or during school start/finish times. Measures may include the identification of vehicle holding areas on route, for vehicles to wait before proceeding to the site.

Commented [MG5]: Where will these holding areas be located?

7.9 Route Planning

7.9.1 The DMS will identify the most efficient and least disruptive routes for construction vehicles, considering factors such as local traffic patterns, road conditions, weight restrictions and agreed routeing measures. This will minimize the impact on local communities and reduce wear and tear on roads.

7.10 Vehicle tracking and monitoring

7.10.1 The DMS could incorporate real-time tracking and monitoring of construction vehicles, to enable better coordination and communication between drivers, site managers and other stakeholders. This will ensure that vehicles adhere to designated routes and schedules, reducing the risk of unauthorised or off-route travel.

7.11 Compliance with regulations

7.11.1 The DMS will help to ensure that contractors comply with measures in the CTMP(s) and other control documents, as well as with local regulations and restrictions, such as permitted hours of operation, designated truck routes, or restrictions on vehicle size and weight.

7.12 Reporting

7.12.1 The DMS will provide data on the efficiency of the construction traffic management process, helping logistics managers and project managers to identify areas for improvement, monitor progress and demonstrate compliance with relevant regulations and guidelines.

7.13 Material Procurement Measures

7.13.1 The CTMP(s) will address the following measures to promote the efficient procurement of materials, avoiding waste and ensuring that impacts on local communities are minimised:

7.14 Design for Manufacture and Assembly (DfMA) and Off-site Manufacture

7.14.1 During the detailed design stage, ~~consideration will be given to incorporating~~ the DfMA and off-site manufacturing practices will be a consideration, where applicable. These approaches have the potential to decrease the volume of construction vehicles arriving at the Airport during the construction period,

enhancing road safety and reducing environmental impacts. Additionally, implementing DfMA and off-site manufacturing can lead to a reduction in waste generation, further contributing to a more sustainable construction process.

7.15 Re-use of Material On-site

7.15.1 Re-using materials on-site reduces the need for procuring and transporting new materials to the Airport and reduces waste disposal, decreasing construction vehicle movements and resulting in decreased traffic congestion and emissions. The detailed approach for re-use of material is described in the Waste Strategy and Outline Construction Materials Management Plan.

7.16 Smart Procurement

7.16.1 GAL will factor into its selection of contractors the ability to minimise the number of construction vehicle movements through a contractor's supply chain and approach to logistics. Environmental benefit can be derived through sourcing of materials, location of freight delivery infrastructure, willingness to collaborate with other suppliers and use of alternative delivery modes.

7.17 Delivery by Rail

7.17.1 GAL and its contractors will continue to explore the feasibility of having some materials delivered by rail, rather than using the road network, in order to maximise the sustainability of delivery methods, where doing so would not compromise the safe, reliable and efficient operation of the rail network for other freight and passenger services. GAL will review with Network Rail potential measures for transporting construction materials by rail and conduct such engagement with third parties as may be required to establish their practicality. Evidence that rail delivery methods have been given due consideration, including but not limited to any that may be practicable, will be identified in the CTMP(s).

8 Other Measures

8.1.1 GAL will also explore the following further measures to reduce congestion and other impacts on the local community of construction traffic:

8.2 Wheel washing

8.2.1 Where necessary, wheel washing facilities will be provided at the main egress points from the works areas onto the existing road network. These will be self-contained facilities using a water recycling feature. The units will be regularly cleaned and maintained. These will prevent the impact of dust and dirt on the

Commented [MG6]: I don't think that local residents would want any dust and dirt being deposited upon them.

existing road network and local residents.

8.2.2 Road sweepers will be deployed on the highways in the immediate roads around the airport to ensure that the roads are regularly cleared of detritus.

Commented [SS7]: Acknowledge and welcome the inclusion of this commitment but the wording should be amended to reflect the wider geographic scope of road sweepers. It is not just the immediate roads around the airport but should also include those around the compounds, some of which may have access points that aren't on the immediate roads around the airport.

8.3 Training Events

8.3.1 GAL will arrange training event(s) to be arranged and open to local residents, schools and businesses to highlight the risks that construction traffic can pose on other road users. There will also be a focus on cyclists and ensuring that they are aware of safe road positioning in relation to HGV's

8.4 Collaboration with other Project sites

8.4.1 GAL will encourage its contractors on projects related to the Project's construction works to form a collaborative working relationship ~~with neighbouring sites~~ and share resources and infrastructure such as vehicle routeing, laydown area sharing, shared bussing and transportation to compound and worksites, joint procurement, shared best practices and joint waste management to reduce the construction traffic impacts. This can be achieved by developing a collaboration framework that outlines the objectives, responsibilities, and communication channels for all parties involved in the various sub projects.

8.5 Implement a Construction Workforce Traffic Plan (CWTP(s))

8.5.1 The Outline Construction Workforce Travel Plan is a separate document and outlines measures to promote sustainable travel, reduce single occupancy car use, reduce congestion on the highway network external to the Airport and reduce the demand for temporary car parking during the construction stages of the Project. It covers journeys to and from work sites made by the construction workforce and aims to align community wide benefits, reducing impact in the local area. It will be developed through a detailed CWTP to be prepared by GAL and its contractors.

8.6 Compliance with DMRB and other relevant standards/guidance

8.6.1 For the public road network, t~~T~~he CTMP(s) must comply with the following relevant parts of the Design Manual for Roads and Bridges and other guidance, for example:

- GG 116 - Requirements and guidance on temporary traffic management short term lane closures for relaxation works, types 0, 1 and 2

- GG 117 The design and implementation of temporary traffic management and road works

- ARTSM Guidance on the use of Portable Traffic Signals
- Lane widths must be suitable for HGVs and in accordance with Chapter 8 of the Traffic Signs Manual and any additional requirements detailed in the Design Manual for Roads and Bridges (DMRB) guidance.

8.7 Establishment of a Traffic Management Forum

8.7.1 The CTMP(s) will secure the establishment of a Traffic Management Forum (TMF) to be held at least quarterly from the commencement of works under the DCO. The TMF would focus on the monitoring and communication of traffic management during construction and would consist of GAL, GAL's contractors, utility companies, local highway authorities, public transport operators, emergency services, and National Highways.

Commented [SS8]: This could be confused with the Transport Mitigation Fund (TMF) and therefore an alternative name for this forum should be established. Ie Construction Traffic Management Forum (CTMF)

8.7.2 The TMF would, in advance of their meetings, be provided with any proposed updates to CTMP(s) as well as the outputs of the monitoring required under an approved CTMP(s). The TMF would review the performance of implemented traffic management with a focus on:

- Direct impacts to local and strategic road network
- Indirect impacts on the wider network as a result of the implemented
- traffic management
- Impacts on local businesses and communities.

8.7.3 Prior to the commencement of highway construction a Traffic Management Working Group, comprising GAL and its principal contractors would liaise closely with National Highways and the local highway authorities to establish the methods of co-ordination and management of material and people movement in accordance with the Construction Code of Practice and as reflected in the CTMP(s).

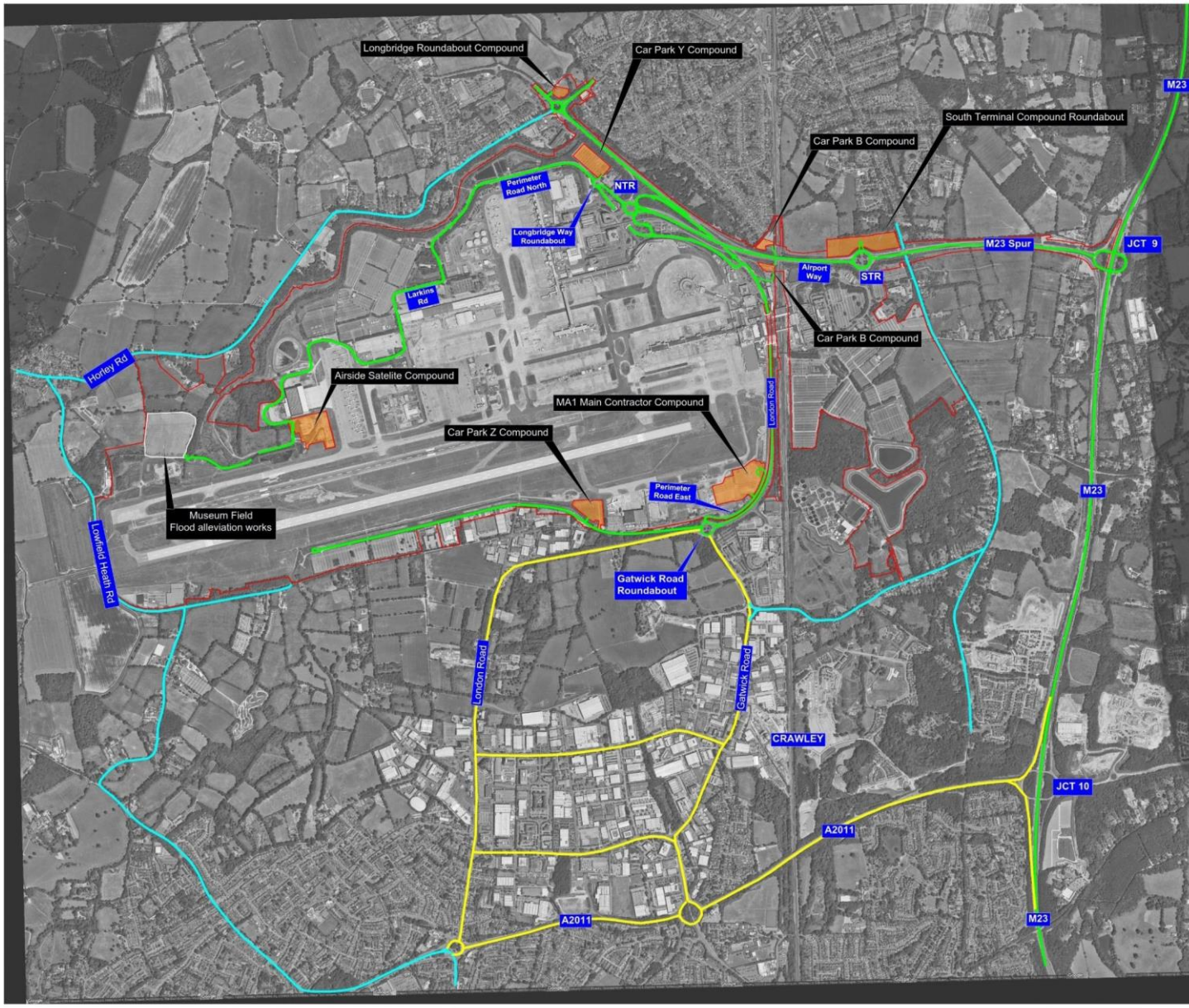
Glossary

Table 1: Glossary of Terms

Term	Description
CARE	Central Area Recycling Enclosure
CBC	Crawley Borough Council
CLOCS	Construction Logistics and Community Safety
CoCP	Code of Construction Practice
CTMP	Construction Traffic Management Plan
CWTP	Construction Workforce Travel Plan
DfMA	Design for Manufacture and Assembly
DMS	Deliver Management System
DVS	Direct Vision Standard
ES	Environmental Statement
FORS	Fleet Operator Recognition Scheme
GAL	Gatwick Ltd
HGV	Heavy Good Vehicle
LGV	Light Good Vehicle
LPG	Liquefied petroleum gas
MA1	Maintenance Area 1 used as the Main Contractor compound
NH	National Highways
NTR	~~Norh~~North Terminal Roundabout
OCTMP	Outline Construction Traffic Management Plan
OCWTP	Outline Construction Workforce Travel Plan
STR	South Terminal Roundabout
WRRR	Work Related Road Risk Requirements
CARE	Central Area Recycling Enclosure

Appendix A – NRP Temporary Compounds and Construction Vehicle (HGV) Access Routes

Commented [SS9]: As per earlier comments. Clarification is required in relation to construction access to the Reed Bed Water Treatment System and whether this result in changes to the proposed access routes.



Appendix A: Gatwick NRP Temporary Compounds and Construction Vehicle (HGV) Acces

APPENDIX II

Book 5

VERSION: 1.0

DATE: JULY 2023

Application Document Ref: 5.3

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Gatwick Airport Northern Runway Project

Environmental Statement

Appendix 5.3.2: Code of Construction Practice Annex 2 - Outline Construction Workforce Travel Plan

APFP Regulations 5(2)(a) **Infrastructure Planning (Applications: Prescribed Forms and Procedure) Regulations 2009**

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1 Executive Summary

1.1.1 The Gatwick Airport Northern Runway Project (the Project) aims to increase airport passenger numbers and aircraft operations. This Outline Construction Workforce Travel Plan identifies potential measures to facilitate efficient and sustainable travel options for the construction workforce throughout the duration of the construction of this Project. The main objectives of this plan are to minimise traffic congestion, reduce environmental impact and promote the wellbeing of the workforce.

1.1.2 Gatwick Airport's location provides excellent connectivity via established public transport and road networks. The anticipated temporary construction compounds are positioned to allow efficient access to and from the site, reducing journey times and potential disruptions. An indicative work schedule is included in the plan showing the type of the construction at different stages of the Project.

1.1.3 This plan considers the various transport modes available to the workforce: public transport, including rail and bus services; private car travel; car sharing; and active travel routes like walking and cycling. The plan acknowledges the potential issues with single private car travel and proposes measures to reduce the use of this mode and mitigate the impact of those who continue to use it.

1.1.4 A key aspect of this plan is the introduction of initiatives to motivate the workforce to transition from single vehicle use to alternative, more sustainable options. These include measures to promote active travel, incentivise public transport usage and encourage car-sharing. It also proposes the use of a low-emission bus fleet to further reduce environmental impact.

1.1.5 The plan outlines responsibilities for implementation and includes a communication strategy, using a dedicated website, information boards and a workforce welcome pack to ensure all stakeholders are well-informed. The plan outlines how a subsequent detailed CWTP will be prepared and approved and how this plan's effectiveness will be monitored, allowing for continuous improvement and adjustment as necessary.

2 Introduction

2.1.1 The Project comprises alterations to the existing northern runway at Gatwick Airport, together with the development of a range of infrastructure and facilities to allow increased airport passenger numbers and aircraft operations (Chapter 5.2 of the ES).

2.1.2 The Project includes the following key components (which are detailed further in Chapter 5 of the ES):

- amendments to the existing northern runway including repositioning its centreline 12 metres further north to enable dual runway operations;
- reconfiguration of taxiways;
- pier and stand alterations (including a proposed new pier);
- reconfiguration of other airfield facilities;
- extensions to the existing airport terminals (north and south);
- provision of additional hotel and office space;
- provision of reconfigured car parking, including new car parks;
- surface access (including highway) improvements;
- demolition and relocation of the Central Area Recycling Enclosure (CARE) facility;
- water treatment facilities; and
- reconfiguration of existing utilities, including surface and foul water.

2.1.3 During the construction period for the Project there will be impacts from construction traffic due to movement of construction materials and the construction workforce travelling to and from the Airport. The impact of the former will be managed in accordance with a Construction Traffic Management Plan (CTMP) and the impact of the latter will be managed in accordance with a Construction Workforce Travel Plan (CWTP), both of which will be developed by GAL and its contractors generally in accordance with the Outline Construction Traffic Management Plan (OCTMP) and Outline Construction Workforce Travel Plan (OCWTP) (respectively) and approved by the relevant Local Planning Authority (in consultation with the relevant Highway Authorities).

2.1.4 The construction workforce will be comprised of a number of specialist and skilled staff and laborers. This will include administrative, managerial or technical staff, skilled construction workers (carpenters, masons, steelworkers, plumbers, electrician, painters), paving crews, concrete finishers, equipment operators and unskilled laborers. The size and structure of the workforce will vary at different stages of the Project, depending on the specific construction requirements. It is anticipated that the construction workforce will peak at around 1,350 workers in mid-2026 and 2030.

2.1.5 The construction workforce will need to travel to and from the site. In anticipation of increased vehicle movements as a result, this OCWTP has been prepared to identify the key matters and measures which will be considered by contractors during the logistical planning and execution of the construction works, in order to promote sustainable travel, reduce single occupancy car use, minimise congestion on the highway network and reduce the demand for temporary car parking during the construction stages of the Project. The outlined measures will reduce the environmental impact of the Project, including on the local community, while ensuring that the construction workforce has a range of travel options to access the Airport during construction.

3 Aims of the Construction Workforce Travel Plan

3.1.1 The measures outlined in this OCWTP to be developed in the subsequent CWTP are designed in pursuit of the following aims as regards the local community, staff and passengers at the Airport and the construction workforce.

3.1.2 In terms of consideration for the local community, the aims of the OCWTP, to be implemented through the CWTP are as follows:

- reduce congestion caused by the construction workforce on key routes and junctions, especially during the traditional morning and evening peak travel times;
- mitigate unwanted on-street parking on local streets;
- maintain safety for local road users through minimising increases in traffic levels on local routes;
- minimise noise impacts throughout the Project; and
- minimise impacts on local air quality.

3.1.3 In terms of consideration for staff and passengers at Gatwick Airport, the aims are as follows:

- minimise impact on business as usual (BAU) airport operations due to workforce movement requirements and activities;
- minimise impact on BAU for airport passengers;
- minimise the space allocation required for provision of construction-related car parking; and
- promote public transport to the construction workforce.

3.1.4 In terms of consideration for the construction workforce, the aims are as follows;

- reduce travel by private car, particularly single occupancy car journeys;
- encourage a reduction in car dependency;
- encourage multi-occupancy car use;
- increase workforce awareness of the environmental and health benefits of different travel choices;
- maximise accessibility for public transport, walking and cycling as sustainable transport modes;
- achieve the highest possible public transport mode share; and
- encourage sustainable travel choices.

3.1.5 In terms of consideration for the environment, the aims of the OCWTP, to be implemented through the CWTP are as follows:

- Minimize impact on the wider environment of travelling by unsustainable means wherever possible

4 Construction Logistics and Timetable

4.1 Workforce Logistic Compounds and Site Support

- Several contractor compounds have been identified for the development of the Project. These sites, shown in Figure 1 below, are summarised as follows (with further detail in the Buildability Report):

    - **Main Contractor Compound** (known as MA1): the main compound for the Project - includes offices, welfare facilities, car parking and bus terminals;
    - **Airfield Satellite Compound**: required for most of the airfield works to the northwest of the airfield - includes offices, welfare facilities, limited car park capacity and bus terminals;
    - **Car Park Z Compound**: used as a staging and laydown area for the airside works - includes additional car park capacity;
    - **Car Park Y Compound**: used for material re-processing from the airside works and at a later stage for surface access works - includes a small office, welfare facilities and limited car parking;
    - **South Terminal Roundabout Contractor Compound**: the main compound for surface access works - includes offices, welfare facility, bus stops and car parking;
    - **Longbridge Roundabout Contractor Compound**: used for surface access improvement works at the Longbridge Roundabout – includes a very small welfare unit without car parking capacity for privately owned vehicles; and
    - **Car Park B Compound**: used for the works at Airport Way Bridge over the A23 London to Brighton railway line – includes small offices, welfare facilities and car parking.

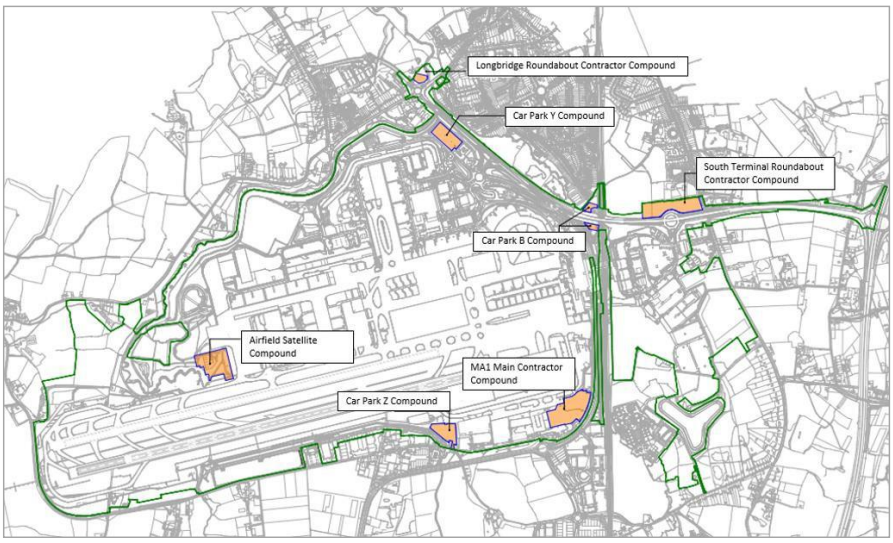


Figure 1: Location of Contractor Compounds

- Detail about how the temporary construction compounds will be laid out and the proposed uses is set out in **ES Appendix 5.3.1: Buildability Report Part A** (Doc Ref 5.3) The key

Commented [SS10]: Does the Reed Bed Treatment System Compound, introduced under Project Change 3 need to be included within this section of the plan and figure 1 updated?

construction operations to be allocated to contractor compounds are expected to include some or all the following activities:

- **site entrances and access gates**: these are the main points of entry and exit for the workforce, vehicles and equipment, designed to control and secure access to the construction sites;
- **airside access** (Main and Airfield Satellite Compounds): areas of the airport that provide access to runways and taxiways, including safety and security checks for vehicles and workforce entering and leaving construction sites;
- **project and site offices**: the spaces where project management, administrative tasks, planning and commercial activities are carried out;
- **workforce welfare facilities**: spaces provided for the wellbeing of the workforce on site, such as restrooms, showers, kitchen and canteen, training, medial facilities and safety equipment storage areas;
- **temporary car parking**: provisional parking areas set up to accommodate vehicles of the workforce, visitors or machinery within the compound; and
- **livery vehicle parking**: designated parking areas specifically for vehicles that bear brand liveries of the contractors, often used for transport or delivery services related to the Project.

- There will be construction-related and construction workforce-related trips to these locations at various project stages. As outlined below, most car parking for the construction workforce will be located in the Main, South Terminal Roundabout and Car Park Y compounds. The Main Compound will host the majority of these spaces and therefore will be the destination for the highest number of construction workforce trips.

- The Project's indicative schedule showing key milestones and their anticipated timing is included in the **ES Chapter 5: Project Description** (Doc Ref 5.1).

Commented [MG11]: SCC would expect all access to Airfield Satellite Compound, Car park B and Car park Y compounds to be from within the existing internal access roads served from the main North Terminal Roundabout. SCC would not support access from the northern or western perimeters of the airport from Charlwood/Hookwood local roads.

Commented [MG12]: SCC would not accept any non active/non-sustainable construction workforce accessing South Terminal Roundabout compound from Balcombe Road.

5 Existing Transport Connections

5.1 Location of the Airport

- Gatwick Airport is located in Crawley in West Sussex, southeast England, 29.5 miles south of Central London, and covers a total area of 674 hectares as shown in Figure 2 below. The primary roads around the airport include the M23 motorway, A23 and A217.

Figure 2: Aerial view of Gatwick Airport

- Gatwick has operated around an integrated road and rail interchange for over 80 years. The Airport's South Terminal is directly connected to the M23 motorway with a dedicated motorway spur at Junction 9, which in turn connects to the M25. Most of the Airport's traffic utilises these connections. The South Terminal Airport Way connects to the North Terminal, which also sits adjacent to the A23 running between Crawley and Horley, further improving roadway access.
- GAL's modelling assumes that construction workers are drawn from Croydon, the 'Gatwick Diamond' area (consisting of the local authority districts of Crawley, Mid Sussex, Horsham, Mole Valley, Reigate and Banstead, Epsom and Ewell, and Tandridge) and Brighton and Hove. Whilst some construction workers will be drawn from a wider catchment due to the significant nature of the Project, the duration of the Project over several years is likely to result in many construction workers staying in the area temporarily while working at the Airport.
- This OCWTP summarises the existing transport connections to the Airport which may be utilised by the construction workforce. How these modes of transport may facilitate access to particular construction compounds and sites will be detailed in the subsequent CWTP produced in advance of the commencement of construction.

5.2 Rail

- The Airport railway station is located adjacent to the South Terminal with direct access from and to the terminal concourse. The North Terminal is connected via a free transit train which runs every 3 minutes at peak times. The station has regular, direct daily services from over 120 stations. Over 1,000 stations are accessible with one interchange.
- There are four service brands provided by two train operators serving Gatwick Airport:
- **Gatwick Express (Operator: Govia Thameslink Railway Limited)** provides a direct service to London Victoria, departing every 15 minutes in peak periods and taking around 30 minutes. Some trains extend to Brighton at peak times.
- **Southern (Operator: Govia Thameslink Railway Limited)** provides services across London and the South-East, including London Victoria, London Bridge, Clapham Junction, Brighton, Southampton, Eastbourne and Portsmouth, as well as many local stations.
- **Thameslink (Operator: Govia Thameslink Railway Limited)** connects Gatwick Airport to the south coast at Brighton, central London through London Bridge, St. Pancras International and Farringdon, and north to Bedford. Thameslink also provides a direct train to Luton Airport Parkway.
- **Great Western Railway (Operator: Great Western Railway Limited)** runs an hourly service between Gatwick Airport and Reading, via Redhill, Reigate and Guildford. This is known as the North Downs Line.
- Gatwick Airport therefore enjoys a very high level of rail connectivity, with 19 trains to and from central London in the morning peak hour (9 to London Bridge and 10 to London Victoria, of which four are Gatwick Express services).

5.3 Bus and coach

- Proximity to local roads and the Strategic Road Network (SRN) allows access by both local buses and long-distance coach services. These can be operated efficiently to within a short walking distance of both terminals. Gatwick is served by frequent bus and coach services including Metrobus, National Express, Megabus, Oxford Bus Company, and Easybus.
- The majority of local bus services are provided by Metrobus, which provides three 'Fastway' bus routes and four conventional routes serving the Airport. The main towns served are Crawley, Horley, East Grinstead, Redhill, Caterham and Horsham.
- The main coach services are provided by National Express, which provides a range of direct access to and from the Airport, including 10 destinations in south and central London (with London Victoria as the main terminus), south Wales and East Anglia. In total over 30 other towns and cities are served throughout England and Wales[1].

5.4 Active Travel

- The airport is not presently well-connected to adjacent communities in Horley and Crawley via segregated walking and cycling routes, with the absence of direct and commodious safe and sustainable travel options. There

[1] Your Journey to Work – Staff Travel Plan 2013 -2030

are a number of designated and permitted rights of way that link the Airport to the surrounding area, offering paths, bridleways and woodland trails for those suitably equipped and attired.

- Footpaths are provided in the areas around the South and North Terminals including the Perimeter Road East and Perimeter Road South and it is therefore possible to access the Main Compound, South Terminal Roundabout Compound and Car Park Y and Car Park B Compounds on foot. Access to the Airside Satellite Compound is not possible on foot due to its distance from the Airport boundary.

- The South Terminal and railway station lie adjacent to National Cycle Network Route 21 which in turn links to recreational routes across the south-east. Dedicated cycle routes are provided to the Airport and cyclists can cycle on local carriageways with traffic. The exception to this is east off the South Terminal roundabout to J9 of the M23 motorway, where cycling is prohibited. Cycle parking is already provided at the South and North Terminals and further covered and secure cycle parking will be provided at the main contractor compounds.

- The key active travel routes are shown in Figure 3 below.

Commented [MG13]: Much improved cycling connections will be required for these facilities to be used at virtually all of the compounds.

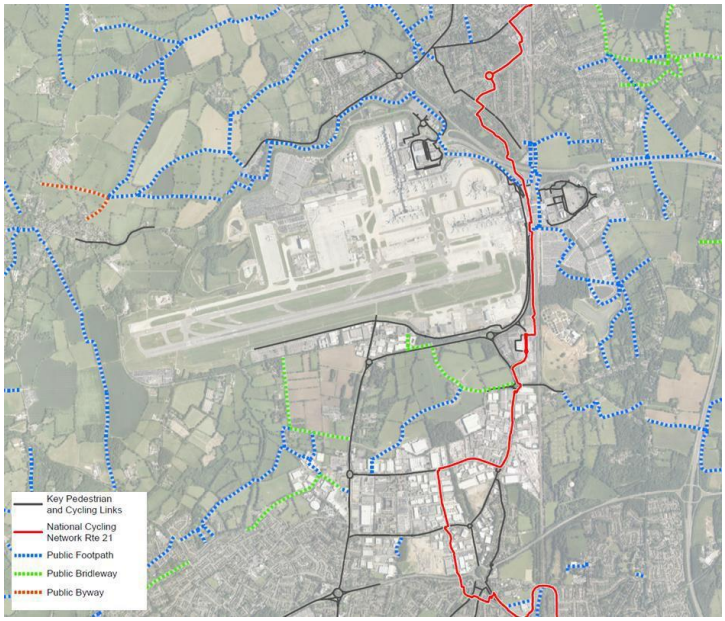


Figure 3: Key Active Travel Routes around Gatwick Airport

5.5 Privately owned vehicles

- The primary access to the Airport construction compounds by privately owned vehicles will be via the M23 motorway, which offers a direct route to the Airport. As a secondary access route, the A23 road could be utilised. This route, while not as direct as the M23, provides a valuable contingency path. The workforce living within the local vicinity of the Airport will be discouraged from using local roads for daily commuting by privately owned vehicles by limiting access to only from the SRN. They will be encouraged to use local roads for sustainable and active travel commuting.

6 Travel Plan Methodology

6.1.1 This OCWTP outlines measures to manage the movement of the construction workforce to and from the Airport. The purpose of the plan is to promote and facilitate a shift from using private vehicles to alternative forms of transportation. It outlines measures that will be developed further through the production of a detailed CWTP and then implemented to encourage the construction workforce to use public transport, car sharing, cycling or walking instead of relying solely on private cars.

6.1.2 The subsequent detailed CWTP will specify how the outline measures in the following sections will be implemented as regards specific parts of the Project and how these will build on the existing transport options to the Airport. The need for a subsequent CWTP arises from the fact that the quantity of the construction workforce will vary during the Project and will not be finalised until schedules, phasing options and construction methodology are further progressed, with input from GAL's contractors (once appointed). At present, it is anticipated that the construction workforce will peak at around 1,350 individuals in mid-2026 and again in 2030.

6.1.3 The collaboration between GAL and its contractors will be crucial to develop and implement an effective CWTP. GAL and the relevant contractors will work together to ensure that the arrangements and measures outlined in this OCWTP can be progressed and implemented in a detailed CWTP to realise the potential for significant mode shifts from private vehicles to alternative forms of transportation, promoting sustainability and decreasing the environmental impact of the Project.

7 Travel Plan Measures

7.1 Commitment to Sustainable Commuting

- GAL is committed to encouraging sustainable commuting practices among the construction workforce and outlines the following measures to achieve this goal. These initiatives focus on sufficient but not excessive car parking provision as well as measures to support active travel, public transport use and car sharing. These strategic measures aim to reduce the environmental footprint of the Project, enhance employee welfare and contribute to the broader environmental goals set by the Airport.

7.2 Car Parking

- GAL's modelling adopts a conservative estimate that 90% of the construction workforce will drive to the Airport (either alone or with others), before accounting for the measures outlined in this OCWTP. Sufficient car parking will therefore be provided in the construction compounds, with preliminary numbers tabulated below, to mitigate the risk of unlawful and/or inconvenient parking in local residential or industrial areas and thus reduce the resultant impact on local communities. A dedicated periodic shuttle bus service will transport the workforce to the relevant site locations from the contractor compounds and back to the compounds at the end of their shifts.
- The number of temporary parking spaces required has been assessed quantitively based on the workforce profile. Assumptions in the assessment include:
    - a peak workforce of approximately 1,350 in a day;
    - a conservative estimate of an average of 1.5 construction workers per vehicle;
    - a typical profile of management, civil engineers, construction and M&E within the workforce and their respective likelihoods of driving to the contractor compounds; and
    - that the maximum parking demand will occur at shift changeover, where parking is required for the arriving workforce and also for those of the previous shift yet to leave.
- Table 1 below shows the number of car parking spaces allocated to each contractor compound and represents in total an average of 65% of the total maximum workforce for each working shift for the Project. These figures account for spaces provided for disabled drivers, as well as areas that will be designated for construction workers to be dropped off and picked up.

Table 1: Parking spaces allocated to compounds

Contractor Compound	Number of Parking Spaces
MA1 Main Contractor Compound	500
Airfield Satellite Compound	200
Car Park Z compound	10
Car Park Y Compound	10
South Terminal Roundabout Compound	150

Longbridge Welfare Facility	10
Car Park B Welfare Facility	10

7.3 Reducing Congestion

- To mitigate the effect of the majority of the construction workforce travelling to and from the site by private vehicle at the same times of day, and particularly where those times of day intersect with generally busy commuting times, shift start and finish times will be staggered where practicable to reduce pressure on local transport services, roads and construction site infrastructure. Additionally, shift start and finish times will be structured, where possible, to avoid construction workers having to travel within the traditional AM and PM peak hours of 8am till 9am and 5pm till 6pm and within Gatwick Station peak times.

Commented [SS14]: Can the Applicant provide a clear commitment as to the minimum time period that shift start and finish times would be staggered by?

7.4 Initiatives to Support Active Travel

- GAL aims to promote active travel modes (i.e. walking and cycling) where reasonably practicable in order to reduce traffic congestion, road casualties, carbon emissions and improve local air quality.

- Several active travel initiatives have been considered to support walking and cycling as transportation modes to the various contractor compounds for those members of the construction workforce that live within a suitably close distance of the site. As part of any new employees or contractors' induction relevant information will be provided to all staff to ensure that they are aware of all the relevant travel options and incentives available to them. This may be provided in the form of an induction pack and will include the offer to access personalised travel planning advice. This would provide personalised travel advice to those staff that are interested and would highlight potential travel options from their home address and potential financial, environmental, time and health benefits of using active travel. The personalised travel advice would also highlight the potential financial incentives on offer to employees and contractors'. The following will be explored and those that will be implemented will be detailed in the subsequent CWTP:

Safe Cycle Routes

- Design consideration is being given to safe access routes for walking and cycling as part of the Project (including as part of surface access improvements). These surface access improvements should be constructed as early in the programme as possible to maximise take up by staff/construction workers.

Cycle Stands

- Provision of convenient, secure and weatherproof cycle parking facilities in the contractor compounds. Provision of cycle repair stations (stands featuring basic bike maintenance tools) and track pumps will be provided at all cycle parking facilities in contractor compounds. This will ensure that basic maintenance of bikes can be undertaken by staff.

Incentives

- Provision of a 'cycle to work bundle' including discounts on bike and equipment purchases and free bike servicing. Incentives to encourage cycling will include:

- The payment of a fixed sum per worker trip to work by active travel means (a sum of say £10 per day)

    - A discount for cycles and cycle equipment will be negotiated/provided for employees/contractors at either local or national cycle shops.

    - Various cycle to work days will be run with rewards for those who cycle to work on those days. These could align with national events such as National Cycle to Work Day or Bike Week. Typical cycle to work days have included the provision of free breakfasts for those who cycle to work on that day.

    - Consideration will be given to running competitions between teams or contractors. These could be run where teams are competing to have the highest number of staff cycling into work over a period of time or by the mileage different teams have travelled via bike to work. The emphasis of these events will be to encourage cycling to work and prizes or rewards will be provided for the teams that win such competitions.

    - Cycle training for those who would like to cycle to work but lack confidence will be offered. This could be provided through West Sussex County Council's one on one cycle training https://www.westsussex.gov.uk/roads-and-travel/road-safety/one-to-one-cycle-training/.

    - Consideration will be given to providing regular Dr Bike on-site cycle maintenance sessions.

    - Consideration will be to the need and benefits in creating an internal user group for cyclists where issues can be discussed, or problems raised to seek to remove barriers for people cycling.

Showering And Locker Facilities

- Equipping welfare facilities at the contractor compounds with changing rooms, showering and locker facilities, which would enable cyclists to freshen up upon arrival at works, promoting a comfortable transition from cycling to the work environment.

Walking Infrastructure

- Providing infrastructure to support walking as a mode of transportation, including the installation of pedestrian signage, directional indicators and information boards to guide and inform workers about walking routes, distance, and estimated travel times.

Workforce Engagement

- Engagement with the workforce to promote the benefits of walking and encourage its adoption, potentially involving organising walking campaigns, providing information on the health, environmental and financial advantages of walking and highlighting the walking routes available to the workforce. As with incentives to cycle to work, similar measures will be adopted to encourage waking to work, for staff that live within a reasonable walking distance of the site. This will include walk to work days, to encourage staff and contractors to walk to work on given days. For any staff who are working shift work and live within walking distance of the airport but are concerned about personal safety, especially at night, the provision of personal safety alarms could be made available to staff.

7.5 Initiatives to Support Public Transport

- GAL aims to introduce and endorse initiatives to encourage the use of public transport modes, providing the construction workforce with affordable and convenient commuting options by rail and bus. These initiatives are intended to reduce congestion and contribute to the environmental goals set by the Airport. The following will be explored and those that will be implemented will be detailed in the subsequent CWTP:

Site Shuttle Buses

- The organising of regular shuttle bus services from designated pick-up points, including the Airport bus stops and railway station, and local communities such as Horley, Redhill, Reigate, Crawley and Horsham to transport members of the construction workforce directly to the compounds and construction sites. This would facilitate arrival by public transport and thus reduce reliance on private vehicles and thereby alleviate traffic congestion.

- The regular shuttle bus services would be in operation throughout working hours to cater for shift changeovers and individuals that need to arrive and depart at irregular intervals. Passenger waiting facilities such as real time passenger information signs, bus time information and covered waiting areas with seats will be provided at bus stop locations within the contractor compounds.

Commented [MG15]: Does this mean that local bus services will be diverted into these compounds? Have local providers signed up to commit to this?

Collaborating with Local Authorities

- Ongoing collaboration with local authorities to improve public transit routes to the construction site, potentially involving GAL funding the increase in the frequency or the capacity of buses, ensuring that public transportation is easily accessible and efficient for the workforce.

Incentives and Subsidies

- Potentially offering incentives or subsidies to contractors and/or workers where workers choose to commute to the construction site using public transportation, to encourage its use.

Commented [SS16]: For clarity further detail as to what incentives and subsidies will be considered here would be useful. Would these be financial incentives such as contributions towards bus season tickets? Could financial incentives be offered to contractors if they achieve a certain percentage of trips via sustainable modes?

Commented [MG17R16]: As suggested above, SCC would propose a fixed sum per journey such as £10.00 to really incentive travel by these modes.

Dedicated Workforce Bus Services

- Provision for a dedicated bus services between the Airport and local areas, which would be fully funded by GAL, if there are areas with a sufficiently high concentration of construction workers. This would be subject to planning, procurement of a supplier and space for operation at the Airport's bus stops to pick up and drop off the workforce.

Park and Ride Workforce Stations

- The possibility of developing one or more 'Park and Ride' workforce stations outside of the Airport and creating a dedicated workforce bus connection from these locations to contractor compounds. This would support maintaining business as usual for Airport passengers and reduce the potential impact of construction workers using the railway station, local roads and local bus services serving the Airport.

Commented [MG18]: Where would these be?

Lift Share Schemes

Opportunities to implement Demand Responsive Transit (DRT), Demand Responsive Service (DRS), Dial-a-Ride Transit (DART) or Flexible Transport Services (FTS), which are forms of transport where vehicles alter their routes based on particular transport demand rather than using a fixed route or timetable. These vehicles typically pick up and drop off passengers in locations according to passenger needs and can include taxis, buses or other vehicles.

7.6 Initiatives to Support Car Sharing

- In respect of members of the construction workforce who cannot or choose not to use public transport or active travel modes, GAL will encourage car sharing in order to reduce the overall number of vehicles on the road and thereby reduce the social, economic and environmental impacts associated with individual workers travelling in their own private vehicles. The following will be explored and those that will be implemented will be detailed in the subsequent CWTP:

Dedicated Car Share Bays

- The designation of specific parking areas closer to the welfare buildings specifically for car sharers. By providing these dedicated car share bays, car sharing would be more convenient and attractive for the workforce.

Incentives and rewards

- Potentially offering participants financial incentives, which would reward those choosing to car share and help to foster a positive attitude towards sustainable commuting practices.
- Promotion and education about potential individual savings from the sharing of fuel expenses. When workers choose to car share, the cost of fuel can be divided among the participants, resulting in individual savings. This financial benefit provides an extra incentive for workers to opt for car sharing instead of driving alone. A ride matching database will be established to match people from similar origins who want to car share, to maximise the take up of car sharing amongst contractors.

7.7 Low Emission Bus Fleet Vehicles

- Air pollution can be reduced by replacing vehicles on our roads with cleaner alternatives such as electric, hybrid, hydrogen, LPG, Euro 6 & 5 engines or by fitting emissions reduction equipment. Low emission vehicles would be encouraged and used where practicable for all contractor workforce bus services accessing the Airport to minimise any potential air quality effects.

Commented [SS19]: For clarity it would be useful to provide further details as to what these financial incentives may be. Also, if financial incentives are being offered for car sharing should they be not done for those who choose to walk and cycle? It is noted that similar provision is made for those using public transport, paragraph 7.5.5.

Commented [MG20R19]: SCC would support this - see comments above.

Commented [SS21]: Additional measures that have not been referred to within the document but should be, are:

- The provision of EV charging infrastructure in contractor compounds. A percentage of the car parking spaces could be provided with EV charging.
- The EV charging car parking spaces could be provided closer to the welfare buildings, similar to the car share bays.
- No specific provision is made for powered two wheelers within the compounds. Secure and covered motorcycle parking should be provided such as ground anchors or rails or post which allow the vehicle to be secured.

8 Delivering the CWTP

8.1 Roles and Responsibilities

- The CWTP is a comprehensive plan that aims to promote sustainable travel behaviour among the construction workforces. A detailed CWTP will be subsequently prepared in respect of the Project generally in accordance with this OCWTP in collaboration between GAL and its contractors.

Commented [MG22]: This suggests that it is already formulated. If it is, can we please see it?

8.2 Construction Travel Plan Coordinators (CTPCs)

- To ensure the successful implementation of the CWTP, a Construction Travel Plan Coordinator (CTPC) will be appointed prior to the commencement of the Project. This CTPC will have responsibility for overseeing the day-to-day activities of the CWTP, including communication, monitoring and updating as necessary.
- The responsibilities of the CTPC will include:
    - communicating the CWTP across the site, including promoting the benefits of travel planning, acting as a point of contact for the workforce requiring information, and updating communications as required;
    - undertaking monitoring consistent with the agreed framework and ensuring that the results are communicated to GAL and the contractors. This will include evaluation of the monitoring against targets, review of targets where appropriate and agreeing appropriate mitigation measures where necessary;
    - periodically reviewing the CWTP and updating as necessary; and
    - working closely with GAL to ensure that all the construction workforce receive information regarding sustainable travel.

Commented [MG23]: Clarification needs to be given that these travel behaviours will not be included in the SAC's which cover Airport Workers (ie Construction Travel is outside of the SAC targets).

9 Travel Plan Communication Strategy

9.1 Travel Plan Website

- GAL or its contractors will set up and regularly update a Travel Plan website for the Project. This will be an interactive tool available to the workforce to provide up-to-date information on measures and incentives. All survey results, initiatives, local transport information and proposed meetings will be made available.

9.2 Travel Plan Information Boards

- Located in public areas, information boards will provide up-to-date information for the workforce on the following:
    - the CWTP, highlighting its aims and objectives;
    - any CWTP measures or initiatives;
    - public transport links, including bus timetables and service destinations and details of safe pedestrian and cycle routes between the bus stops and the train station;
    - telephone numbers for local taxi firms;
    - contact details for the CTPC;
    - details of CWTP meetings, events or workshops and information from previous events; and
    - a ride matching database to match people who want to car share from similar locations

9.3 Workforce Welcome Pack

- An online 'welcome pack' for the workforce will be produced prior to the commencement of construction and provided to all new arrivals. The welcome pack will be introduced as part of the induction process. It will draw attention to the CWTP measures and include up-to-date travel information, including public transport timetables, maps of walking and cycling routes, details of car share schemes and included all information in relation to the incentives available to staff and contractors. The welcome pack will also offer all staff and contractors the option to access personalised travel planning advice. This would highlight potential travel options from their home address to the airport and potential financial environmental, time and health benefits of using active and sustainable travel.

10 Monitoring Framework

10.1.1 The CWTP will incorporate a comprehensive monitoring framework that will indicate how well it is performing at meeting any target mode shares Wor any other targets that are set throughout the life of the plan. Monitoring will also assist in refining CWTP measures and establishing future targets.

10.1.2 A CWTP is a continuous and on-going process of monitoring and review, rather than a one-off event. The CTPC will be responsible for encouraging participation of the workforce in the monitoring process, as well as coordinating the monitoring strategy and reporting the results to GAL and the relevant planning authority and highway authorities (as required). This fosters transparency, accountability and compliance with local regulations and sustainability objectives.

10.1.3 By integrating a continuous monitoring and review process, the CWTP remains dynamic and responsive to changing circumstances. It allows for the refinement of measures and the establishment of targets that align with the wider goals of the Project and the needs of the local community.

Commented [MG24]: What will these mode share targets be? If the OCWTP starts with the premise that 90% of construction workers will drive in private vehicles, (see paragraph 7.2) they're not going to be very stretching.

APPENDIX III

York Aviation

Gatwick North Runway Project

Rule 17 Response - Future Baseline Sensitivity Analysis

1. The ExA, in its Rule 17 letter of 9th May 2024, requested that the JLAs should *"confirm their own future baseline figure or the range that they would be content with the Applicant assessing, along with an explanation of which elements of the applicant's case they disagree with"*. As requested by the ExA, the Joint Local Authorities (JLAs) set out their view on the appropriate Baseline Case for assessment in **REP4-049**. This submission, prepared by York Aviation, drew on evidence provided in earlier submissions, notably **REP3-123**, as to why it was not plausible for GAL to rely on being able to increase its passenger throughput to 67.2 mppa as the basis for assessing the impacts of the NRP relative to the Baseline and set out a reasoned alternative view. At the request of the Applicant, **REP4-049** also set out a view on what the application of consistent assumptions regarding the components of growth would mean for the NRP Case.

2. The ExA's Rule 17 letter then asked *"the Applicant to provide a sensitivity analysis based on this JLA future baseline figure (or, if a range, then the minimum and maximum of this range) to test the effects of this alternative future baseline upon the effects stated in the application Environmental Statement"* as well as to respond explicitly to the points made in **REP3-123** (appended also to **REP3-117**) regarding peak spreading and to address the question raised by the ExA regarding the implications on growth of airlines being unable to add capacity in the peak on the ability to grow in the Baseline, without development, Case

3. At D5, the Applicant has helpfully collated a number of airline submissions in **REP5-071** which, whilst supporting the need for additional capacity at Gatwick, make clear the extent to which their ability to grow is already heavily constrained without the NRP development. This is clear in the tabulated responses from:

   - Aurigny
   - Eastern Airways
   - Norse Atlantic Airlines, noting that *"Gatwick's capacity constraints have often resulted in delays and disrupted schedules"*
   - SunExpress Airlines, noting that *"The growth of SunExpress Airlines is currently limited due to the lack of slot and constrained capacity at LGW"*

4. In more detailed letters included in **REP5-071**, a number of airlines elaborated on their views:

   - *Ascend Airways makes clear that shortage of capacity makes it difficult for it to grow at Gatwick: "the existing capacity constraints make it challenging for us to establish our market position and grow our operation."*

- *Ethiopian Airlines, although explaining its desire to grow at Gatwick and make use of available slots, does make clear that the timing of its flights is critical to its ability to grow noting "However, any significant capacity increases will require new capacity at times which enable us to link to our departure and arrival banks at our Addis Ababa hub."*

- *Jet2 makes clear why it cannot grow at Gatwick currently: "Gatwick ..... in the summer, is running at full capacity. Due to this reason, we have therefore not made any application for Summer 2024 slots, as we know that even if a minimal number of slots is awarded, the timings and uncertainty of scheduling would make an operation ineffective given our model, which requires a minimum of two rotations per day."*

- *TUI makes the point that "For example, we often experience congestion around the airfield, particularly at peak times, which can cause unnecessary delays despite careful management."*

- *Turkish Airlines explains the constraints on its scheduling: "However, any significant capacity increases will require new capacity at times which enable us to link to our departure and arrival banks in our Istanbul hub."*

- *Wizz Air states that "The primary limitation today is the runway capacity" in the context of its inability to grow.*

5. Overall, these airline statements corroborate the concern already expressed by the JLAs about the realism of the Applicant's original claim for its Baseline Case that it could credibly increase its single runway throughput by 20 million passengers a year, requiring an increase of 15% in annual aircraft movements and an increase of 44% above the level of passengers handled in 2019.

The Applicant's Analysis of the Sensitivity Test Cases

6. The Applicant sets out its response to the Rule 17 request in **REP5-081**. A substantial part of the submission is taken up with critiquing the implications of the JLA's alternative Baseline and NRP Cases, with a focus particularly on the latter. It is important to note that it was the Applicant that requested a view from the JLAs on the future NRP Case <u>on a consistent basis</u> with the Baseline Case, which was what was provided in **REP4-049**. Although not part of the ExA's original Rule 17 request, additional information was also requested by the Applicant in terms of intermediate years along with some details of the traffic composition in terms of long and short haul operations and this was provided separately.

Applicant's Alternative Sensitivity Test

7. At paragraph 4.1.2 of **REP5-081**, the Applicant sets out that it started from a position that the throughput in the NRP Case would need to be reduced by the same amount as in the Baseline Case, i.e. 7 mppa, resulting in the difference between the two cases remaining c.13 mppa. This arises because the Applicant contends that each of the growth factors, namely peak growth, peak spreading, aircraft size and load factor would be equally impacted in both cases. However, the evidence, as explained in paragraphs 6 and 7 of **REP3-123,** suggests that this does not follow as historic peak spreading has been associated with increases in peak period runway capacity such that peak growth demonstrably facilitates greater peak spreading, i.e. there is a compounding effect to growth the more that capacity is added in the peak.

8. The Applicant's original position on the alternative NRP Case scaled back not only peak spreading but the amount of peak growth assumed based on information shared informally with us. It is not entirely clear why the Applicant made this downward adjustment to the peak

capacity to be added by the NRP in its original position on an appropriate basis for the sensitivity test, but it corrects for this by adding back movements equating to 2 mppa in its proposed alternative sensitivity test at paragraph 4.1.4 and 4.1.5 of **REP5-081**, resulting in a difference in passenger throughput at the Airport of 15 mppa in 2047 in its alternative sensitivity test. Despite this adjustment, the derivation of both the Applicant's alternative Baseline and NRP Cases, that underpin its alternative sensitivity test, is not clear and appears somewhat arbitrary.

9. Furthermore, whilst the Applicant's alternative sensitivity test assumptions are closer to our reasoned analysis, the Applicant makes clear that it believes that its original Baseline and NRP Cases remain robust. We do not agree.

YAL Baseline Case

10. We now set out to clarify aspects of how we derived the appropriate range for the Baseline Case and then applied the assumptions consistently to the NRP Case. From the Applicant's commentary in **REP5-081**, it would appear that it has misunderstood the approach adopted as explained in **REP4-049**.

11. It is important to emphasise that it is not YAL's position that there can be no peak spreading at all in the Baseline Case, as stated by the Applicant at paragraph 2.1.18 of **REP5-081**, rather that the ability to spread the peak over the year is related to the ability to add services during the busy summer period that can also operate year round, for the reasons set out in **REP3-123**. It is clear from our reading of airline responses that there is very limited likelihood of airlines adding services solely outside of the peak summer period. Recognising, however, that there are still slots available in the summer within the current declared capacity, albeit at less attractive times of the day, we assumed that there could be some growth outside of the peak hours within the day and tested the implications of an additional 12 daily aircraft movements each day in the busiest summer month or an additional 24 daily aircraft movements. This is, of itself, diurnal peak spreading.

12. As a consequence, the ratio of the average day in the busiest month to the average day in the average month at Gatwick would fall from around 1.17 in 2019[1] to around 1.16 as more of the remaining available capacity on the runway during the summer is taken up, limited by the times commercially attractive to the airlines, and new services assumed to operate year round. To the extent that any new services are only viable in the peak, this would increase rather than decrease the busy day to average day ratio. To the extent that there are some services which may be able to operate only in the less busy times of the year, when passenger demand levels are lower, or the operating periods of current summer only services extended, this would counterbalance this effect to some degree. Overall, we believe that our assumptions appropriately balance these two factors and present a realistic Baseline scenario.

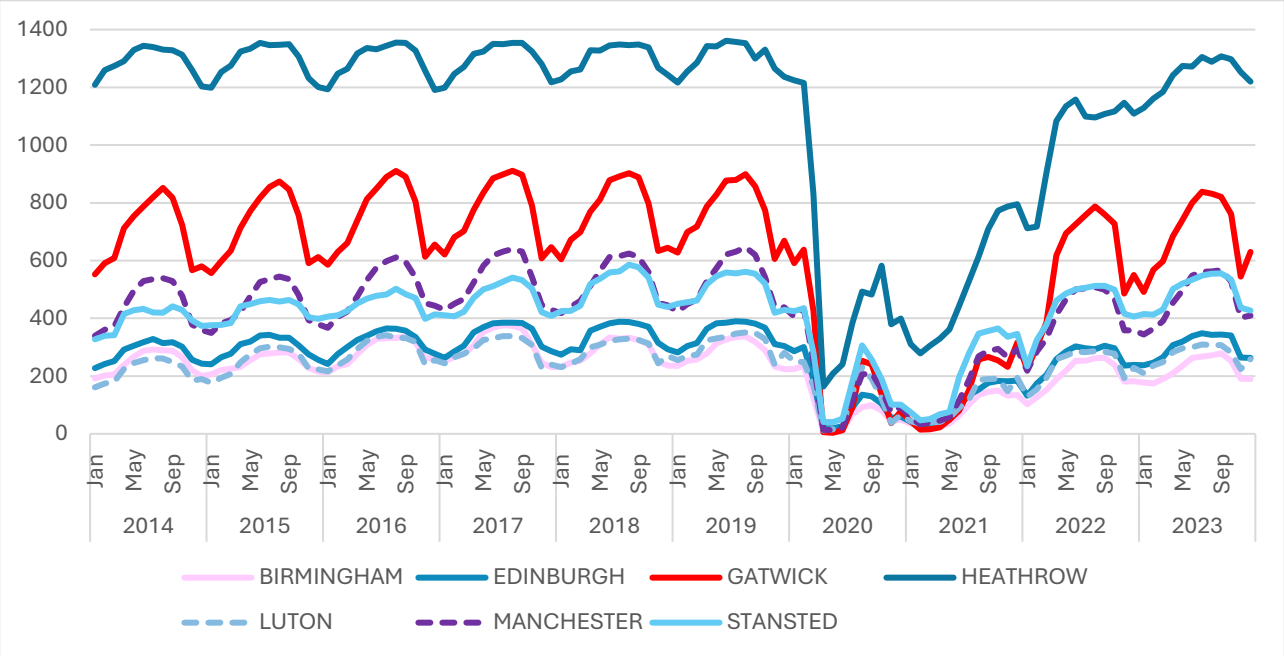
13. We note that, in 2023, the actual busy to average day ratio attained at Gatwick was 1.21, reflecting changes in its traffic composition post pandemic that have increased the dependence on the peak period. To some degree, this is likely to be a reflection of the faster recovery of leisure travel, compared to business travel, with a greater dependence on travel in the summer peak. Leisure travel is also expected to continue to be the faster growing market across the UK, suggesting that greater reliance on the summer peak is likely to continue into the future. Using data on the number of aircraft movements scheduled for 2024[2], it would appear that the equivalent ratio will still be in excess of 1.2 in terms of the busy day to average day movements, which is significantly higher than the trajectory indicated in in Figure 4.4.1 of **REP5-081** that suggested a peak to average ratio of 1.15 for 2024 falling to 1.13 in the Applicant's alternative

[1] Using CAA monthly Airport Statistics for Air Transport Movements.
[2] Using the Online Airline Guide.

sensitivity test. From our analysis of the airlines' plans for the rest of this year, it would seem that the Applicant has started from too high a base position in considering what may be attainable in the Baseline, indicating the potential pitfalls of relying mainly in short term airline expectations as a basis for forecasting outcomes as these expectations in terms of winter season growth do not appear to have materialised in 2024.

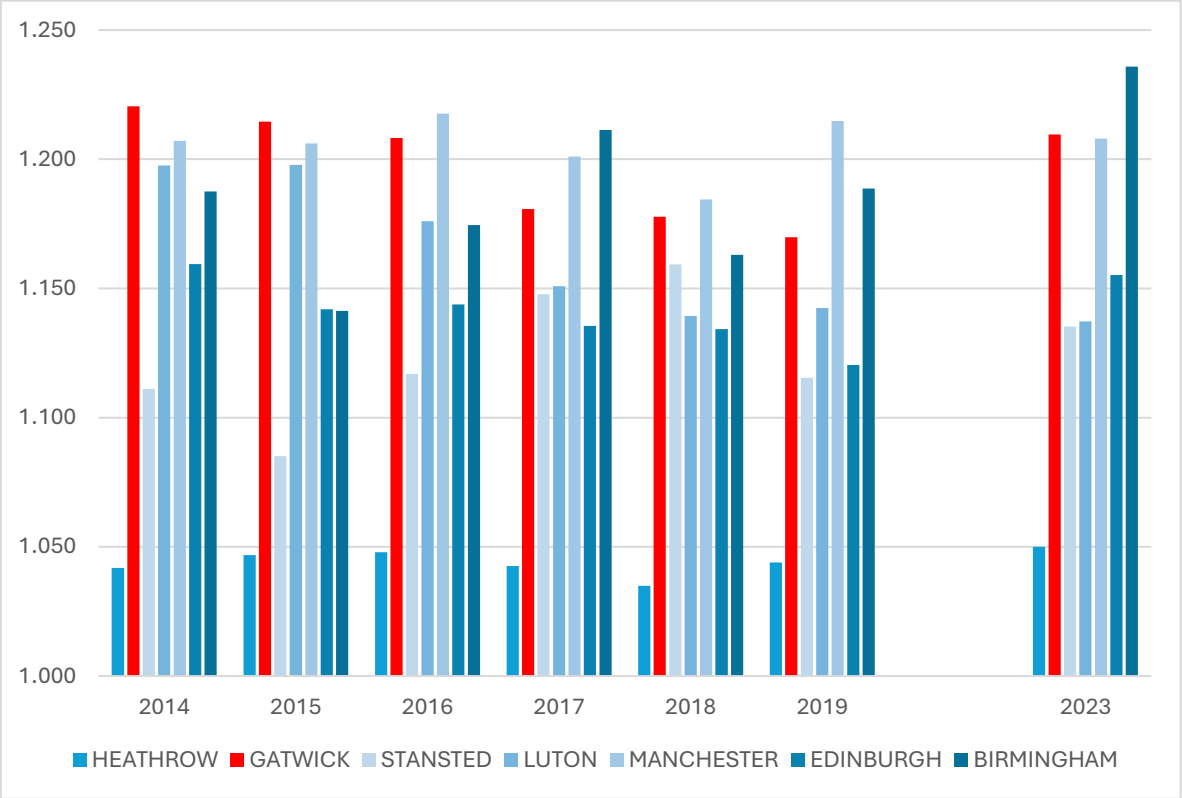
14. Our view as to the appropriate assumptions about expected seasonal patterns of demand at Gatwick is corroborated by considering how its profile of demand compares to the other larger UK airports. **Figure 1** shows the pattern of average daily aircraft movements by month at the UK's Top 7 airports from 2014 to 2023. **Figure 2** shows the ratio of the average day in the busiest month to the average day for the same airports, excluding the pandemic affected years 2020-2022. It is evident that Gatwick's profile is more in line with the other larger UK airports, other than Heathrow, in terms of its seasonal profile and, in many ways exhibits more extreme peaks and troughs of demand based on its traffic mix. The difference to the flatter profile exhibited at Heathrow can be explained in large part by Heathrow's hub role which enables it to smooth its annual profile of demand as the airlines fill available capacity with connecting passengers in periods of the year when there is less local point to point demand.

Figure 1: Average Daily Aircraft Movements by Month 2014-2023 at the UK's largest airports



Source: CAA Airport Statistics

Figure 2: Ratio of the Average Day Movements in the Busiest Month to the Average Day 2014-2023 at the UK's largest airports



15. The Applicant's position, in its original cases, is that it can spread its seasonal peak of demand such that it attains a ratio of 1.07 in terms of the average day in the busy month to the average day in the year (Figure 25 of **REP1-052**), although we note that it states a ratio of 1.06 as applicable at 4.4.3 of **REP5-081**. This would mean that Gatwick has smoothed its profile over the year to match Heathrow and this assumption is applied by the Applicant to both the Baseline Case and the NRP Case. As is evident from Figure 36 of **REP1-052**, all of the peak spreading is expected to occur in the Baseline Case, with no further spreading of the peak in the NRP Case. This does not seem logical or plausible as the more the growth in capacity enables new year round services, the greater the likelihood of flattening the peak in relative terms. Taking into account all relevant factors, including the current profile, in the Baseline Case it would seem plausible that Gatwick might regain the profile of demand that it exhibited pre-pandemic when its runway was effectively fully used, i.e. a busy day to average day ratio of 1.17, with our projections showing this declining further to 1.16 to reflect some spreading of the peak. This is the outcome in our Baseline Case with the lower bound set based on 12 additional daily movements and more cautious aircraft size and load factor assumptions and the upper bound set based on 24 additional daily movements and more optimistic aircraft size and load factor assumptions (Table of **REP4-049**).

16. **Based on our assessment of the expected aircraft size and load factor, it seems likely that the most realistic Baseline throughput would be of the order of 57 mppa, with around 292,000 annual aircraft movements, an increase of 3% in annual commercial aircraft movements and 22% in passengers above the peak levels handled in 2019.**

YAL NRP Case

17. Having reviewed the components of the Baseline Case, in particular the relationship between capacity available on the busy day and the traffic over a busy month and over the year, we then

applied consistent assumptions to the NRP Case but with significantly more movements added on the busy days to match the number of daily slots on the runway modelled by the Applicant, less an allowance for slots still not taken up. This resulted in an assessed annual movement capacity of 366,000 annual aircraft movements achievable with the NRP based on the hourly and daily capacity increase put forward by the Applicant.

18. On this basis, the NRP Case passenger total would be in the range 74.8-76.5 mppa, dependent on whether YAL's or the Applicant's load factor assumption is adopted. This represents our assessment of the throughput attainable with the NRP capacity as planned. In other words, the throughput achievable with the NRP would not be 80.2 mppa based on the capacity assessments as presented but of the order of 75-76 mppa with 366,000 annual commercial aircraft movements. In other words, the difference between the with and without development cases for the purpose of environmental assessment would be 18-19 mppa and 74,000 additional commercial aircraft movements, with a higher proportion of the incremental growth being long haul and driving up average aircraft size.

19. Under these assumptions, the demand profile at Gatwick, with the NRP, would become less peaky and the ratio of the average day in the peak month to the average day falls to 1.127 as growth in the peak allows more new year round services to operate. This follows the pattern seen through the pre-pandemic period when peak growth drove a decline in seasonality through more year round services. Just because the Applicant projects that Gatwick could become as large, in passenger throughput terms, as Heathrow today, it does not follow that it could see such a fundamental change in the pattern of its demand as to achieve a flatter seasonal profile such as implied by a peak to average ratio of 1.06 as used in the Applicant's forecasts. We consider our assumptions regarding the extent to which there would be a flattening of the seasonal profile of demand at Gatwick to be reasonable as it would result in the airport attaining a seasonal profile equivalent to that at Paris Charles de Gaulle and Munich Airports today[3], both of which performing a hub role for their national airlines.

20. As the Applicant has been so adamant that it can attain 80.2 mppa from the NRP, we thought it appropriate, in **REP4-049**, to acknowledge that as a potential upper bound throughput for environmental assessment purposes, even if the Baseline throughput was lower. The slower rate of passenger build up to 80.2 mppa was taken from the Applicant's own top down demand projections as set out in **REP1-052**, which are to be preferred over the original projections for the reasons set out in **REP3-123**, albeit these still do not reflect the implications for demand growth should additional capacity be brought forward across the London airports over period to 2047.

21. A further consideration is that, if the achievable throughput in the Baseline is lower than originally claimed by the Applicant, this would have implications for the achievable traffic levels in the early years NRP operations, regardless of underlying demand, due to the need to ramp up operations from the Baseline position. This is illustrated in the graphs set out by the Applicant in Appendix B of **REP5-081**. The Applicant's original assumption as to the throughput of the NRP was based on a Baseline Case that it could handle 311,000 annual commercial movements (Table 10.1-2 of **APP-075**). If it is constrained below this level to 290,000 annual commercial movements, the postulated NRP throughput of commercial movements 378,000 in 2032 does not seem plausible.

22. Much of the Applicant's commentary in Section 3 of **REP5-081** is spent seeking to rebut the plausibility of achieving our higher throughput scenario based on its passenger forecast as, based on the more realistic profile of demand over the year adopted as set out above, the level of traffic on the peak day would be higher that can be accommodated on the NRP based on the

[3] Online Airline Guide schedules for 2024.

simulation modelling outputs illustrated in Figure 3.6.1 of **REP5-081**. There are two points to note:

- *It was made clear at paragraph 32 of **REP4-049** that achieving 386,000 annual movements would require additional hourly and daily capacity to be achieved with the NRP over and above that modelled to date by the Applicant. This was based on the apparent headroom within the delay results presented in **REP1-054**, albeit we are still awaiting further information to validate those outputs; and*

- *The Applicant's modelling of a relatively small increment of additional movements on a busy day (c.5%) is sufficient to give rise to substantial additional delays, highlighting the sensitivity of the assessed capacity of the NRP to small changes in demand.*

23. Overall, rather than undermining the validity of our more cautious forecasts for the Baseline and NRP Cases, the Applicant's analysis in **REP5-081** confirms our previous caution as to whether 80.2 mppa can actually be achieved with the NRP. **On the basis of a more realistic profile of demand over the year, the maximum throughput attainable with the NRP would be 75-76 mppa with 366,000 annual aircraft movements**.

Implications

24. Ultimately, the reason that ensuring that the demand forecasts underpinning the Baseline Case and the NRP Case are realistic matters for two reasons:

- *To ensure that the planning balance is properly assessed having regard to positive and negative impacts; and*

- *ensuring that the mitigations proposed are appropriate.*

25. *In general, the JLAs are content with the Applicant's consideration of the environmental implications of adopting a lower Baseline throughput set out in the remainder of **REP5-081** but there are consequences for the setting of some environmental parameters and targets, particularly those associated with the Noise Envelope and/or within an Environmentally Managed Growth Approach if this is adopted:*

- *To the extent that the Baseline impacts are lower, this would adjust any judgement as to the appropriate sharing of the benefits in both the short and the longer term.*

- *To the extent that the throughput achievable with the NRP is lower or growth slower, this would impact on the Noise Envelope limits, which could otherwise be set too high and allow noisier aircraft to operate without the benefits of growth being realised, subject to seasonality considerations in the setting of the contour limit for the conventional 92 day summer period.*

26. *However, it is not possible to comment further on this at this stage as the outputs in **REP5-081** are based on the original Slow Transition Case fleet mix and not the revised Fleet Mix now proposed by the Applicant at ISH8. It will be essential to revisit the Noise Envelope (EMG) limits in the light of this revised fleet mix and having regard to realistic Baseline and NRP cases.*

27. *In relation to the National Economic Assessment update set out in Section 6 of **REP5-081**, this appears to assume that the slower growth trajectory in the early years in the NRP case derives from projections of demand produced by YAL independently of those by the Applicant. As is made clear in the e-mail exchange at Appendix A to **REP5-081**, we adopted*

the Applicant's own top down passenger forecasts to define the rate at which demand would build up in both NRP cases. This top down modelling used updated national air passenger demand forecasts from the Department for Transport, which showed lower levels of overall demand at the national level. This is explained in ***REP3-123****. Hence, this reassessment of the National Economic impact incorrectly asserts, at paragraph 6.1.3 of* ***REP5-081****, that the benefits would be greater because of increased levels of unmet demand. Coupled with the other flaws in the National Economic assessment already identified at paragraphs 52-56 of* ***REP4-042*** *and not addressed by the Applicant, little weight can be attached to the national level impact as presented.*

YAL/25.6.24

APPENDIX IV

Gatwick North Runway Project

Response to the Applicant's REP5-077

1. This submission responds to **REP5-077** submitted by the Applicant in response to **REP4-052**, although we note that not all matters were responded to, in particular those relating to the economic case. The headings used in **REP5-077** are used below.

2. This submission also summarises current points of disagreement on Need/Forecasting and Capacity to assist the ExA as these specific sections of the Statements of Common Ground with the JLAs were omitted by the Applicant in the D5 submissions.

Policy

3. At the outset, we do not accept the Applicant's assertion at paragraph 2.1.6 of **REP5-077** that we have not engaged with or responded to its interpretation of aviation policy. Simply because we do not agree with the Applicant's construction of policy does not mean that we have not engaged with the matter. We continue to believe that policy sets out clear tests which this Application should address.

4. In relation to the policy set out in the MBU statement *Beyond the Horizon: making best use of existing runways*, the support for airports seeking to apply to make best use of their existing runways is caveated by the clear requirement for *"any proposals should be judged by the relevant planning authority, taking careful account of all relevant considerations, particularly economic and environmental impacts and proposed mitigations. This policy statement does not prejudge the decision of those authorities who will be required to give proper consideration to such applications. It instead leaves it up to local, rather than national government, to consider each case on its merits."*[4]

5. Whilst policy does not limit how many such applications can come forward, it remains vital that the implications are assessed by reference to robust projections of demand. This is made clear in the decision on the Manston Airport DCO where it is stated that:

> *"The Secretary of State notes, however, that the MBU policy states that a decision-maker, in taking a decision on an application, must take careful account of all relevant considerations, particularly economic and environmental impacts and proposed mitigations (MBU paragraph 1.29). The Secretary of State considers that the benefits expected from a proposed development would materialise if there is a need for that development. Therefore, in order to assess whether the expected economic benefits*

[4] Department for Transport, Beyond the Horizon: making best use of existing runways, 2018, paragraph 1,29.

will outweigh the expected environmental and other impacts from this Development, the Secretary of State has considered need in the context of identifying the likely usage of the Development"[5]

6. We are clear that, whilst supportive of the principle of airports making best use of runways, policy is also clear that there should be proper assessment of the impacts by reference to their likely usage. This is the key point that we have been seeking to make, namely that the in principle policy support does not exempt the Applicant from the requirement to present robust projections of likely usage. It is in this regard that submissions have highlighted these aspects of policy, including the policy reference in the *Airports National Policy Statement*[6] to demonstrating a need different from that which can or is expected to be met by development at Heathrow in support of its national hub role.

7. The Applicant goes onto suggest, at paragraph 2.1.5 of **REP5-077** that the Airports National Policy Statement (ANPS) and MBU provide *"unequivocal support"* for airports seeking to make best use of their runways. We do not agree. As noted above, there is still a requirement for airports seeking to make best use to set out robust forecasts of demand so as to demonstrate both the economic effects and environmental impacts.

8. In this regard, we agree with the submissions made by Heathrow Airport Ltd **[REP4-118]** that policy requires that the Applicant must demonstrate that it is seeking to meet a need (demand to use the Airport) that is different from the demand that would be expected to be met by the provision of additional capacity at Heathrow. Hence, the core demand forecasts on which the decision in relation to the current application should be taken are those that make allowance for development to come forward at Heathrow. We note that, in **REP5-076** responding to Heathrow Airport Ltd, the Applicant again seeks to deflect this requirement. We do not agree with the Applicant (paragraph 3.1.20 of **REP5-077**) that the prospects for capacity being added at Heathrow and, indeed, other airports for which decisions are pending, can be completely ignored. It is particularly important to understand whether the claimed benefits of the NRP are robust to the potential for other developments to come forward. Otherwise, there is a risk of harms arising that are not balanced by the benefits that the NRP is realistically capable of delivering.

Demand Forecasts

9. The Applicant has addressed demand forecast points at section 3 of **REP5-077**. We do not agree that its original bottom-up forecasts are *"evidenced"* (paragraph 3.1.3 of **REP5-077**) nor that they can be relied on other than as an assessment of short term airline interests that may, or may not, come to fruition or be sustained (see paragraphs 20-22 of **REP3-123**, paragraphs 30-37 of **REP4-052** in particular the high rate of 'churn' in the long haul market at Gatwick).

10. While it is accepted that the Applicant has always made clear that it did not expect Gatwick to become a major hub airport, so replicating Heathrow's role (paragraph 3.1.2 of **REP5-077**), for the reasons set out in paragraphs 23-28 of **REP3-123**, the Applicant's original demand forecasts, upon which it still bases its case, were derived based on an overall market size that incorrectly included transfer passenger demand projected for

[5] Department for Transport, Application for the Proposed Manston Airport Development Consent Order, Decision, 18th August 2022.

[6] Department for Transport, Airports National Policy Statement, 2018, paragraph

Heathrow with a third runway. It is helpful that the Applicant now concedes (paragraph 3.1.5 of **REP5-077**) that it accepts that there are elements of the demand that would be met by expansion at Heathrow that are simply not available to Gatwick. This reinforces our view that the demand forecasts used to assess the implications of the NRP should properly allow for this, which the Applicant's original forecasts upon which it bases its case (Forecast Databook **APP-075**) do not.

11. We do not suggest, as the Applicant contends (paragraph 3.1.6 of **REP5-077**) that there would not be growth in long haul traffic at Gatwick, rather that cognisance has to be taken of a) its local market and b) the extent to which routes to some long haul destinations are only viable if airlines can avail of transfer traffic to bolster local demand and that this is only likely to be realistic at Heathrow. It was consideration of local demand that resulted in the forecasts for Luton including a small amount of long haul, mainly leisure, traffic by the late 2030s. It remains unclear how the Applicant took the relevant local market factors into account in setting out its growth targets in the Markets and Pipelines Report appended to the Forecast Databook **[APP-075]**.

12. Nor did we suggest that development of the NRP would of itself directly threaten the development of the hub at Heathrow, as proposals for its expansion are brought forward, as the Applicant seeks to assert at 3.1.11 of **REP5-077**. At paragraph 11 of **REP4-052**, we made clear that the more likely outcome is that demand for the NRP will be lower than assessed in the Applicant's core case demand forecasts. This is confirmed by the Applicant at paragraph 3.1.13 of **REP5-077**, albeit our assessment of the potential implications for the demand at Gatwick is somewhat higher than that of the Applicant (paragraph 10 of **REP4-052**).

13. It was only in the revised top-down forecasts presented in **REP1-052** that the Applicant took account of the requirement to discount such transfer passenger demand, as explained in paragraph 26-28 of **REP3-123**. This was then carried through to updated top-down demand forecasts that showed a materially slower build up of demand at Gatwick impacting particularly on 2029 and 2032. These forecasts were further reduced when assumptions were made about the potential addition of capacity at other airports over the period to 2047, including at Heathrow (Table 1 of **REP3-123**). It is for this reason that the Applicant's top-down passenger forecasts, including sensitivity tests, are strongly to be preferred as the basis for considering the benefits and impacts of the NRP. This is also particularly important, alongside the setting of a realistic Baseline, in ensuring that any controls on the impact of growth are appropriately calibrated to the demand and benefits likely to be realised.

14. Although the Applicant appears to take a very black and white view of the policy support provided by MBU, our position remains that it is important that the effects, positive and negative, are properly understood so that appropriate controls and mitigations can be in place at all stages of the development.

15. To be clear, we are not suggesting that there would be no demand to use the NRP should it be consented, as the Applicant has sought to imply in places within REP5-077. The key point is that, in making its recommendation to the Secretary of State, the ExA should have available to it robust forecasts of the demand to use Gatwick in order to ensure that the positive and negative impacts are properly assessed and appropriate controls put in place.

Capacity for Growth

16. Points regarding the Baseline, as referred to in section 4 of **REP5-077** are addressed in a separate submission at D6.

Summary of Outstanding Areas of Disagreement on Need/Forecasting and Capacity

17. To assist the ExA, we thought it helpful to summarise key points of the current position:

Capacity and Operations

- *It is considered that the physical capacity in the Baseline and with the NRP should be assessed based on proven air traffic control procedures as the improvement attainable with proposed new procedures and tools is unproven.*

- *In broad terms, the physical capacity of the existing runway to handle up to 55 movements an hour is agreed, subject to consideration of the total number of movements over the day in line with that assessed by the Applicant in its capacity modelling (**REP1-054**), to ensure that delays do not accumulate to excessive levels.*

- *Further consideration, by way of sensitivity testing, should be given to the extent to which delays to the implementation of FASI-S might give rise to changes in the use of SIDs, including WIZAD.*

- *In terms of the NRP capacity, it is noted that the updated model suggests that delays could be lower than in the Baseline with the NRP in place. Further information has been requested regarding the calibration of the model so as to be able to confirm that the hourly movement rate and total number of daily movements attainable with the NRP can be confirmed.*

Forecasting and Need

- *Although the ability of the existing runway to handle the number and profile of aircraft movements over a busy day as currently assessed by the Applicant is broadly agreed, the ability of that capacity to deliver the demand claimed by the Applicant in the Baseline is not agreed (see **REP4-049** and separate submission at D6). A realistic assumption for Baseline throughput is a ceiling of 57 mppa.*

- *Similarly, it is now clear from **REP5-081** that the NRP may not be able to accommodate 80.2 mppa based on a realistic profile of demand over the day and over the year, with a more realistic ceiling on throughput being 75-76 mppa (see separate submission at D6).*

- *Within the capacities attainable in the Baseline and NRP Cases, the rate of growth is likely to be slower than claimed and assessed by the Applicant, having regard to updated demand forecasts produced by the Department for Transport for the UK as a whole and based on the Applicant's top down forecasting of Gatwick's share of the market, including consideration of the potential impact of growth being attained at other airports over the period to 2047.*

- *The Applicant's Central Case fleet transition is considered the most likely outcome over the short to medium term, accepting that in the longer term there will be a further next generation of aircraft that may have noise and carbon benefits. The Applicant's proposed*

revised Central Case is considered to be in effect a reasonable Slow Transition Case, a position that we understand the Applicant has now accepted (ISH8).

- *The assessment of wider economic benefits is not robust and the UK level economic assessment needs to take into account the extent to which demand to use Gatwick is not substitutable for demand that would otherwise use Heathrow.*

- *The assessment of local catalytic impacts is not robust as it does not address the realities of competition within the UK airport sector and uses a theoretical approach rather than using actual UK data to calibrate the model.*

YAL/25.6.24