



# Gatwick Airport Northern Runway Project

## Appendix D – Response on Construction

### Book 10

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## 1 Introduction

1.1.1 This document provides a response to the comments relating to construction made available at Deadline 8 to the Applicant’s submissions at Deadline 7 from the following Interested Parties:

- Joint Local Authorities;
- Joint Surrey Councils; and
- The Legal Partnership Authorities

## 2 Joint Local Authorities

2.1.1 **Table 1** sets out the Applicant’s response matters relating to construction-related documents raised by the Joint Local Authorities (JLAs) in its **Response to the Applicant’s Deadline 7 Submissions** [[REP8-126](#)] submitted at Deadline 8.

Table 1: Applicant's Response to Matters Raised by JLAs on Construction at Deadline 8

Matter Raised	The Applicant’s Response
<b>Outline Construction Workforce Travel Plan</b>	
In section 7.3, entitled Reducing Congestion, in the OCWTP [REP7- 025] the Applicant has committed to, where practicable, shift start and finish times being staggered. This is to reduce pressure on local transport network. The Joint Local Authorities asked whether the Applicant could provide a minimum time	Shift patterns and minimum time periods for staggering of shifts cannot be confirmed at this stage, as will be developed by GAL and its contactors post-DCO consent. However in response to the JLA’s comment, paragraph 7.3.1 of the <b>Outline Construction Workforce Traffic Plan</b>

<p>period that the shift start and finish times would be staggered by. The concern being that a 5-minute stagger time between shift start and end times would be staggered, but would have no meaningful positive impact on the transport network and would still result in workers travelling to and from the site at the same time of day. The Applicant has responded and stated that the controls on working hours for construction are set out in Section 4.2 of the Code of Construction Practice [REP7-022]. The working hours are indeed set out in this section of the Code of Construction Practice, however no specific details of the staggering of shift times are provided within this section. The times included are more in relation to amenity issues about hours of operation and core hours of construction works.</p> <p>Therefore, the Applicant has not answered the specific question as to whether they can commit to a minimum time period that shift patterns would be staggered by, to ensure that the workers arriving and departing from compounds are not having to travel at the same time. The Highway Authority would ideally look for the Applicant to provide this commitment in the OCWTP.</p>	<p>(‘OCWTP’) (Doc Ref. 5.3) has been expanded to confirm that the future CTMPs will confirm the shift patterns, including minimum time periods for staggering of shift times, and has been submitted at Deadline 9.</p>
<p>At 7.3.3 the Applicant has stated that it will develop an access and egress strategy for construction and construction workforce</p>	<p>The JLAs’ position is noted. The CWTP will be subject to approval by CBC, in consultation with WSCC, SCC and</p>

<p>vehicles from car parks, satellite compounds, park and ride, and worker bus service pick up points to ensure an efficient distribution of construction traffic which minimises movement conflicts and known queuing hotspots, as far as is practicable. Such a strategy needs to be agreed with the Highway Authorities and included in the full CWTP.</p>	<p>National Highways, in accordance with DCO Requirement 13. This aligns with the JLAs’ request and therefore no further response is required.</p>
<p>Under Initiatives to Support Public Transport, in section 7.5 of the OCWTP [REP7-025] the Joint Local Authorities sought clarification as to what incentives and subsidies the Applicant was offering. The Joint Local Authorities queried whether they would be financial incentives towards bus season tickets and whether financial incentives would be offered to contractors, if they achieved a certain percentage of trips via sustainable modes. The Applicant has responded in The Applicant’s Response to Deadline 6 Submissions [REP7-095] that both measures would be considered within the full CWTP. The Applicant has gone on to state, “The precise nature of the incentives and subsidies will be agreed with the contractors to: align with the scale and nature of their activities for the Project’s construction; any existing incentives and subsidies that they operate; the number of workers required physically on site under that contract; and taking account of the nature of their</p>	<p>The Applicant cannot confirm financial incentives at this stage, as these will be developed between GAL and its Contractors post-DCO consent. Such incentives will be confirmed in the future CWTP and subject to approval in line with DCO Requirement 13.</p>



<p>attendance at site (e.g. if the contractor’s involvement is only for a short period of time, a contribution to a season ticket would not be appropriate).”</p> <p>The Highway Authority remain of the view that further clarity could be provided and the Applicant could specifically state in the OCWTP that measures could include financial incentives towards bus season tickets or financial incentives to contractors, but that the precise nature of the subsidies and incentives would be agreed as part of the full CWTP.</p>	
<p>Similar to the point about initiatives to Support Public Transport, the Highway Authority considers it would be useful to provide further details as to what these financial incentives may be provided to support car sharing. Section 7.6 of the OCWTP [REP7- 025] could be amended, under the heading of Incentives and 8 Rewards, to include potential measures that could be included in the full CWTP.</p>	<p>As noted above, details on any financial incentives cannot be provided at this stage. Such details will be included in the CWTP and submitted for approval pursuant to DCO Requirement 13.</p>
<p>The Applicant identifies in Para 7.7.1 [REP7-024/25] that air pollution can be reduced by replacing vehicles with cleaner alternatives such as electric, hybrid, hydrogen, LPG, etc. The</p>	<p>The Applicant considers that paragraph 7.7.1 of the <b>OCWTP</b> provides a clear commitment that low emission vehicles will be encouraged and used where practicable for contractor workforce bus services. This wording is also</p>

<p>Applicant states that low emission vehicles would be encouraged where practicable for the workforce bus services.</p> <p>However, the Applicant should go further by making a commitment that GAL or contractor workforce bus services and shuttle buses are ultra-low emission or zero emission vehicles. This would reduce the negative effects on air quality associated with the construction phase in line with ANPS Policy (e.g. paragraph 5.29). In particular paragraph 5.40, bullet point 2 of the ANPS which identifies low emission plant as a mitigation measure:</p> <ul style="list-style-type: none"> <li>• The use of low emission construction plant / fleet, fitting of diesel particulate filters, and use of cleaner engines</li> </ul>	<p>considered to be consistent with the ANPS (paragraph 5.40) in encouraging the use of low emission vehicles.</p>
<p><b>Outline Construction Traffic Management Plan</b></p>	
<p>The Highway Authority have reviewed the Applicant’s Deadline 7 submission of the Outline Construction Traffic Management Plan Version 3 (Tracked) [REP7-027]. The majority of the tracked changes to the Outline Construction Traffic Management Plan, that were included in the Joint Local Authorities Deadline 6 submission, entitled, Comments on any further information/submissions received by Deadline 5 [REP6-</p>	<p>This document provides the Applicant’s response to points raised by the Highways Authorities in its Deadline 8 submission.</p>

<p>099], have not been included by the Applicant. The Applicant appears to have commented on the comments made in the document but may not have reviewed and considered any of the tracked changes to the document. The tracked changes are in green coloured text and set out in the Joint Local Authorities Deadline 6 9 submission, entitled, Comments on any further information/submissions received by Deadline 5 [REP6-099].</p>	
<p>Under paragraph 5.1.2 in their Deadline 6 Submission, entitled, Comments on any further information/submissions received by Deadline 5 [REP6-099], the Highway Authority queried as to whether the Reed Bed Water Treatment Compound should be included in the list of contractor compounds, as a result of Project Change 3. In the Applicant’s Response to Deadline 6 Submissions [REP7-095], they state that, the OCTMP shows the location of the main temporary construction compounds which are anticipated to be operational for a number of years, as set out in the Indicative Construction Sequencing [REP2-016]. Given that the temporary construction compound for the water treatment works (reed beds) would only be operational for a short period of time (from 2025 to 2026), it has not been listed in the OCTMP. The Highway Authority are of the view that this should be made clear in paragraph 5.1.2 of the OCTMP that</p>	<p>The use of temporary construction compounds is controlled by the <b>Code of Construction Practice</b> (‘CoCP’) (Doc Ref. 5.3), secured under DCO Requirement 7.</p> <p>The Applicant does not consider it necessary to repeat provisions relating to the construction compounds within the <b>OCTMP</b>, given they are sufficiently explained and secured through the <b>CoCP</b>.</p>



<p>these are just the main construction compounds and that others may be required. Presently that is not the case, as it is in the Code of Construction Practice Version 4 (Tracked) [REP7-023]. Paragraph 4.5.8 of REP7-023 states, “In addition, a number of temporary compounds may be erected to support specific construction activities.” A similar statement should be made in Section 5 of the OCTMP.</p>	
<p>In relation to Contingency Routes, in paragraph 6.3.2 of the OCTMP the Applicant has stated that further information on the situations in which it is envisaged that construction traffic would be authorised to use a contingency access will be provided in the full CTMP(s). The Joint Local Authorities have subsequently requested that for the purpose of clarity, as has been done with the Local Roads (Restricted Access) (see paragraph 6.4.1), it would assist if the situations the Contingency Access routes may be used were provided in the OCTMP, most recently see REP7- 103. The Applicant has simply responded, in their Response to Deadline 6 Submissions [REP7-095], that paragraph 6.3.1 of the OCTMP explains that the contingency route may be used “... in the event that the primary access is impaired.” This is not sufficiently clear and may lead to inadequately controlled access along restricted routes. This is of</p>	<p>The JLA position is noted. Details on when the potential contingency routes would be used will be developed by GAL and its contractors post-DCO consent and included in the CTMP(s) submitted for approval pursuant to DCO Requirement 12.</p>

<p>particular concern to Crawley Borough Council, since the J10 M23 contingency route would result in significantly increased traffic volumes passing through its AQMA.</p> <p>The Applicant states (para 6.3.2) that further information on situations where the contingency access routes would be used will be set out in detailed CTMP. However, the JLA request that a framework of defined thresholds for the authorised use of a contingency access, including how it will be monitored and regulated, are provided in the examination and secured through the OCTMP, within the DCO.</p>	
<p>The Joint Local Authorities requested that additional wording be added to the end of paragraph 6.4.2 in relation to Local Roads (Restricted Access). The wording was, “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.” The Applicant has not included this wording and it is not apparent as to why they not done this. This is considered to be standard practice to make contractors and haulage companies aware of potential sensitive sites along construction routes, such as schools. The</p>	<p>Paragraph 6.4.2 of the <b>OCTMP</b> (Doc Ref. 5.3) has been amended in line with the JLAs’ request and is submitted at Deadline 9.</p>

<p>Highway Authority therefore consider that this should be included as a key road safety consideration.</p>	
<p>The Joint Local Authorities requested that additional wording be included at the end of paragraph 7.8.2 in relation to the scheduling of deliveries. The requested wording was, “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.” The Applicant has not included this wording and it is not apparent as to why not. Again, this is considered to be standard practice within a CTMP and therefore it should be included within this project to deal with the potential early arrival of vehicles.</p>	<p>Section 7.8 of the <b>OCTMP</b> explains that the Delivery Management System will plan and schedule deliveries to avoid, where possible, construction deliveries using routes past local schools at peak times, e.g. during school drop-up and pick-up times. This wording addresses the same point that the JLAs are requesting, in ensuring vehicles avoid peak school periods. The Applicant is therefore unclear by the JLAs request and does not consider it necessary to repeat this commitment again within the <b>OCTMP</b>.</p>
<p>In paragraph 8.2.1 of the OCTMP [REP7-027] the Applicant has agreed to arrange training events for local residents and business, particularly around the proposed construction routes. These events will focus on road safety education for other road users. The Joint Local Authorities simply requested that this also included local schools. The Applicant has not included schools</p>	<p>NB - This is now paragraph 8.3.1.</p> <p>In response to the JLA’s request, paragraph 8.3.1 of the <b>OCTMP</b> has been updated to include local schools and is submitted at Deadline 9.</p>

in the latest revision of the OCTMP [REP7-027] and therefore the Joint Local Authorities make this request again.

### 3 Joint Surrey Councils

3.1.1 Table 2 sets out the Applicant’s response to matters relating to construction raised by the Joint Surrey Councils (JSCs) in its **Deadline 8 Submission** [REP8-127].

Table 2: Applicant's Response to Matters Raised by JSCs on Construction at Deadline 8

Matter Raised	The Applicant’s Response
<b>GAL response to D6 submissions [REP7-095]</b>	
<p><u>Summary (i.e. the comment or question)</u></p> <p>The JSCs are not prepared to accept a construction compound access onto Balcombe Road other than for active travel.</p> <p>Applicant Response: Details of how accesses to the construction compounds will be laid out and any required</p>	<p>The JSC position is noted. As previously stated, access arrangements to the construction compounds will be prepared in consultation with the relevant authorities and submitted for approval pursuant to DCO Requirement 12.</p>

<p>parking restrictions will be included in the CTMPs submitted for approval pursuant to DCO Requirement 12.</p> <p><u>JSC comment on GAL response:</u></p> <p>SCC notes that details will be included in the CTMPs submitted for approval pursuant to DCO Requirement 12. This will need to be developed in conjunction with SCC. As per our concerns set out previously, SCC position remains the same.</p>	
<p><u>Summary (i.e. the comment or question)</u></p> <p>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 U-turns being undertaken at the two roundabouts either side of the access.</p> <p><u>JSC comment on GAL response:</u></p> <p>SCC notes that details will be included in the CTMPs submitted for approval pursuant to DCO Requirement 12. This will need to</p>	<p>SCC’s concerns are understood by GAL. As previously stated, the CTMP will be developed in conjunction with the relevant highway authorities (including SCC) and subject to approval pursuant to DCO Requirement 12.</p>

be developed in conjunction with SCC. As per our concerns set out previously, SCC position remains the same.

**GAL Third Change Application Report (REP7-097)**

As the proposals involve the creation of a new temporary vehicular access to the A217, a heavily trafficked A road, SCC would like to understand if it has been explored whether the hotel could instead utilise its current exit onto Povey Cross Road in the event that the existing entrance from the A217 might have to temporarily be closed during the Longbridge roundabout works. The existing exit (which does not appear to be controlled through TRO's) could be widened if necessary to allow for simultaneous entry and exit during those rare occasions that the main access might not be useable.

As the creation of a temporary access directly from the A217 would involve TRO's and construction work on that road (including along the central markings to prevent right turning into the access from the west), this alternative option would be worth exploring.

GAL, in consultation with the hotel operator, have considered a number of options to ensure that suitable access can be maintained to the hotel during the construction of the Project. The new, temporary access from the A217 has been concluded as the best solution for the hotel.

GAL, in consultation with the highway authorities, will prepare details for the new access arrangements and which will be subject to approval through the CTMP pursuant to DCO Requirement 12.



<p>If the temporary access onto the A217 is required, SCC as Highway Authority would require that:</p> <ul style="list-style-type: none"> <li>• It is time bound and temporary.</li> <li>• The works are included in the Section 278 works for the Longbridge Roundabout.</li> <li>• Temporary signage, marking and central barriers on the A217 to prevent right turning into the site from the West are included in the Section 278 (the plans as submitted do not show how this will be achieved).</li> <li>• All fees for the extended Section 278, and Temporary Traffic Regulation Orders are paid in accordance with the intended Section 278.</li> <li>• All works associated with the temporary access are fully removed upon completion of the Longbridge Roundabout works with all verges reinstated and maintained for at least a year afterwards.</li> </ul>	<p>The JSC’s response is noted. As explained above, GAL will prepare the CTMP in consultation with the highway authorities and therefore include consideration of these requests.</p>
<p><b>Outline Construction Traffic Management Plan</b></p>	
<p><u>Summary (i.e. the comment or question)</u></p> <p>South Terminal Compound access from Balcombe Road</p>	<p>The Applicant can confirm that access to the ST Roundabout from Balcombe Road for construction workforce privately owned vehicles will be restricted and</p>

<p><u>JSC comment on GAL response:</u></p> <p>SCC notes that this access will be restricted to the public. However, SCC remains concerned that construction workers can still access from Balcombe Road with associated impact on SCC's Local Road Network. As per our concerns set out previously, SCC request that all access is from the South Terminal Roundabout, with Balcombe Road access restricted to active travel for local construction employees only, with associated parking restrictions added on Balcombe Road.</p>	<p>associated parking restrictions on Balcombe Road will be implementation. To confirm this, paragraph 5.6.2 of the <b>OCTMP</b> has been updated to reflect this and is submitted at Deadline 9.</p>
<p><u>Summary (i.e. the comment or question)</u></p> <p>Construction sites or temporary compounds that can only be accessed by local roads.</p> <p><u>JSC comment on GAL response:</u></p> <p>Please can it be confirmed if any routes are affected in Surrey?</p>	<p>Balcombe Road in Surrey County would be affected whilst construction activities are happening on / above the road - new bridge works to the M23 Spur as detailed in paragraph 6.4.1 of the <b>OCTMP</b>.</p>
<p><u>Summary (i.e. the comment or question)</u></p> <p>Restrictions</p>	<p>The JSC's request is noted, however the Applicant cannot provide any further details on the accesses onto the Restricted Use Access roads at this stage. Such details will be informed by input from GAL's contractors post-DCO</p>

<p><u>JSC comment on GAL response:</u></p> <p>We note the restricted use access of Povey Cross Road/Charlwood Road/Horley Road/The Street as well as Balcombe Road – please provide details of accesses to be used onto these roads and associated activities planned.</p>	<p>consent and included in the CTMP submitted for approval pursuant to DCO Requirement 12.</p>
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## 4 Legal Partnership Authorities

4.1.1 Table 3 sets out the Applicant’s response to matters relating to construction raised by the **Legal Partnership Authorities’ Post Hearing Submission ISH9: Mitigation [REP8-165]** submitted at Deadline 8.

Table 3: Applicant's Response to Matters Raised by Legal Partnership Authorities on Construction at Deadline 8

Matter Raised	The Applicant’s Response
<b>Outline Construction Traffic Management Plan</b>	
<p>The Authorities consider that contingency access through Crawley’s Air Quality Management Area (AQMA) at J10 M23 needs to be tightly controlled to protect air quality. Currently insufficient information has been provided by the Applicant on the situations and frequency of use of the contingency route, on</p>	<p>The points raised by the Legal Partnership Authorities repeat the content of the Deadline 8 submissions made by Joint Local Authorities [REP8-126] and the Joint Surrey Councils [REP8-127], and which the Applicant has responded to above.</p>

how this route would be monitored and managed in practice to minimize the use of the route. The Local Authorities consider that changes are needed to para 6.3.1-6.3.2 oCTMP to provide this information.

The majority of the tracked changes to the Outline Construction Traffic Management Plan, that were included in the Joint Local Authorities Deadline 6 submission, entitled, Comments on any further information/submissions received by Deadline 5 [REP6-099], have not been included by the Applicant.

These include:

- Need to clarify that other construction compounds may be provided to those listed in paragraph 5.12
- The Applicant should commit to providing measures to avoid/mitigate the early arrival of delivery and construction vehicles, paragraph 7.8.2.
- Road Safety training events should be extended to include local schools, paragraph 8.2.1.
- Access arrangements for construction compounds within Surrey

### Outline Construction Workforce Travel Plan

The Applicant states that low emission vehicles would be encouraged where practicable for the workforce bus services in the construction phase. However, the Applicant should go further by making a firm commitment that GAL or contractors workforce bus services and shuttle buses will be ultra-low emission or zero emission vehicles. This is proposed to help reduce the negative impacts of the Proposed Scheme.

The majority of the tracked changes submitted by the Joint Local Authorities in, Comments on any further information/submissions received by Deadline 5 [REP6- 099], have been accepted by the Applicant and are now included in the revised OCWTP [REP7- 025].

However, outstanding matters, which will be highlighted at Deadline 8, include:

- Clarify the minimum time period shift times will be staggered to avoid workers ending and starting the shift travelling at the same time.
- Clarification as to what measures are to be provided to encourage PT use, in Section 7.5.

The points raised by the Legal Partnership Authorities repeat the content of the Deadline 8 submissions made by Joint Local Authorities [REP8-126] and the Joint Surrey Councils [REP8-127], and which the Applicant has responded to above.

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| <ul style="list-style-type: none"><li>• Clarification as to what measures are to be provided to encourage car sharing, in Section 7.6.</li></ul> |  |
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