



Gatwick Airport Northern Runway Project

Environmental Statement

Appendix 11.3.1: Summary of Stakeholder Scoping Responses – Water Environment

Book 5

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1 Introduction

1.1 General

1.1.1 This document forms **Appendix 11.3.1** of the **Environmental Statement (ES)** (Doc Ref. 5.3) prepared on behalf of Gatwick Airport Limited (GAL) for the proposal to make best use of London Gatwick Airport's existing runways and infrastructure (referred to within this report as 'the Project').

1.1.2 This document provides the summary of stakeholder scoping responses for the water environment for the Project. Table 1.1.1 summarises responses to the 2019 scoping opinion.

Table 1.1.1: Scoping Opinion Responses

Consultee	Details	How/where addressed in ES
Crawley Borough Council	The Environmental Statement (ES) should be clear on the clear synergies between drainage and ecology impacts	See paragraph 11.1.3 in ES Chapter 11: Water Environment (Doc Ref. 5.1).
Crawley Borough Council	Paras 7.5.17 /18 in the Environmental Impact Assessment Scoping Report (EIASR) suggest that there is existing under capacity in pollution storage lagoons and the pumping system	See Planning Inspectorate (PINS) comment ID 4.5.2, responded to in Table 11.3.1 in ES Chapter 11: Water Environment (Doc Ref. 5.1).
Crawley Borough Council	CBC would welcome engagement with GAL to agree appropriate modelling scenarios to address climate change	The potential impacts of climate change have been taken into account within in ES Appendix 11.9.6: Flood Risk Assessment (FRA) (Doc Ref. 5.3). The latest Environment Agency guidance on climate change has been adopted for this assessment which is based on UKCP18.
Crawley Borough Council	In para 7.5.25 there appears to be an error in the water quality baseline data as the 2017 target has been passed?	Surface water bodies generally have a deadline of up to 2021. Where it is deemed that the water body cannot achieve that, particularly if some of the status elements are at 'Bad', then the deadline shifts to 2027.
Crawley Borough Council	Are the drainage patterns described in para 7.5.45 [of the scoping report] correct?	The description is correct.
Crawley Borough Council	The surface water drainage strategy should be based on sustainable principles (SuDS) except where it can be proven that this cannot be achieved because of airport safety considerations	The outline drainage strategy is summarised in ES Appendix 11.9.6: Flood Risk Assessment (Doc Ref. 5.3).
Crawley Borough Council	CBC would also wish to ensure that any drainage strategy for the Project can demonstrate through the ES that there is no likelihood of increased flooding occurring upstream (south) of Gatwick	The potential increase in flows due to changes in hardstanding/impermeable areas is considered in ES Appendix 11.9.6: Flood Risk Assessment (Doc Ref. 5.3). An assessment of the impact on water quality is provided in Section 11.9 (ES Chapter 11: Water Environment (Doc Ref. 5.1))
Crawley Borough Council	It is essential to understand how pluvial and fluvial flows will be managed during the construction phase of the development	Construction phase flood risk is considered within ES Appendix 11.9.6: Flood Risk Assessment (Doc Ref. 5.3) and in Section 11.9 (ES Chapter 11: Water Environment (Doc Ref. 5.1)).
Crawley Borough Council	The ES should highlight and needs to carefully consider the environmental impacts of increased flows on watercourses especially the increase in sediment loading to surface water and water quality /pollutants as a result in of the significant increase in impermeable area	The potential increase in flows due to an increase in hardstanding/impermeable areas is considered in ES Appendix 11.9.6: Flood Risk Assessment (Doc Ref. 5.3). An assessment of the impact on water quality is given in Section 11.9 (ES Chapter 11: Water Environment (Doc Ref. 5.1)).
Crawley Borough Council	CBC consider that there could be an increase in sediment loading and pollutant deposition due to increase in aircraft and ground vehicle operation. This should be assessed in the ES.	The potential increase in flows due to an increase in hardstanding/impermeable areas is considered in ES Appendix 11.9.6: Flood Risk Assessment (Doc Ref. 5.3). An assessment of the impact on water quality is given in Section 11.9 (ES Chapter 11: Water Environment (Doc Ref. 5.1)).
Crawley Borough Council	The approach taken to water supply in respect of mitigation, enhancement and monitoring paragraph 7.5.87 is not considered robust	In the 'Gatwick Sub-region' Joint Water Cycle Study (2010), Sutton and East Surrey Water (SESW) expressed concerns about the 'over-abstraction' of catchments and a deficit to meet

Consultee	Details	How/where addressed in ES
		peak water supply demands during dry years. However, at a meeting with GAL on 3/10/19 SESW stated that this would be unlikely as a result of the proposed works at Gatwick.
Environment Agency	Reference is also made to the possible extension of the existing culvert that carries the River Mole/Crawter's Brook beneath the runway, this is an aspect of particular interest as further information to demonstrate that flood risk will not be increased will be necessary	The existing culvert and syphon that convey the River Mole beneath the Gatwick runways would need to be extended by circa 26m to accommodate the new northern runway. However, it is considered that the 300m realignment (including renaturalisation) of the River Mole slightly further downstream from the culvert would offset a culvert extension. To avoid extending a closed culvert, the Project will convey the River Mole under the relocated Juliet Taxiway via an extended daylighted channel from the exit to the existing culvert. The channel will have a gridded roof to permit light to reach the water surface. The extended section will include planting to soften the sides and a resting pool for fish at the downstream face. A weir will also be included at the upstream face of the easterly culvert bore to divert low flows into the westerly bore, and hence increase depth of flows in low flow conditions. The syphon does not carry River flows except in flood conditions and will simply be extended.
Environment Agency	The FRA should incorporate the latest guidance on climate change, this aspect is referenced as part of section 7.5.15. The FRA should clearly demonstrate how the risk to flooding from both fluvial and surface water will not be increased as a result of any development on the site	The potential impacts of climate change have been taken into account within ES Appendix 11.9.6: Flood Risk Assessment (Doc Ref. 5.3). The latest Environment Agency guidance on climate change has been used for this assessment, which is based on UKCP18. The FRA also sets out the impact of the Project to all sources of flood risk, demonstrating it would not increase risk to other parties.
Environment Agency	It would be prudent to understand how the flood storage area owned and operated by GAL situated on the Gatwick Stream close to Crawley Sewage Treatment Works is viewed in relation to the risk to flooding from reservoirs	Flood risk from reservoirs is addressed in ES Appendix 11.9.6: Flood Risk Assessment (Doc Ref. 5.3). The Environment Agency has confirmed that their Risk of Flooding from Reservoirs mapping includes the result of a potential breach of the Gatwick Stream Flood Storage Area.
Environment Agency	We would like to see stronger links and references made between the sections on ecology and water environment	See paragraph 11.1.3 of the ES Chapter 11: Water Environment (Doc Ref. 5.1). ES Appendix 11.9.2: Water Framework Directive Compliance Assessment (Doc Ref. 5.3) considers the impact of the Project on the chemical and biological aspects of receiving WFD watercourses.
Forestry Commission	It is essential that the ancient woodland identified is considered appropriately to avoid changes to the water table affecting ancient woodland	Potential changes to the water table are addressed in Section 11.4 of ES Chapter 11: Water Environment (Doc Ref. 5.1).
Mid Sussex District Council	Flood risk from sewers should be reviewed in more detail and reported in the ES	Flood risk from sewers is addressed in ES Appendix 11.9.6: Flood Risk Assessment (Doc Ref. 5.3). The assessment of flood risk from sewers has been informed by the development of surface water drainage, integrated drainage and fluvial, and wastewater hydraulic models.
Mid Sussex District Council	A review of existing on-site ground investigations should be included in the ES	Land quality issues are addressed in ES Chapter 10: Geology and Ground Conditions (Doc Ref. 5.1).
Mid Sussex District Council	The assessment should consider the effect of sediment from construction on surface water drainage in terms of blockage and reduced capacity.	The assessment of construction effects is included in Section 11.9 of ES Chapter 11: Water Environment (Doc Ref. 5.1).
Mole Valley District Council	Following review of the 2000 Local Plan in 2007, Policies ENV64 and ENV66 were not saved and are therefore not applicable.	Noted and reference is made to Local Planning Policies relevant to the Water Environment in Table 11.2.3 of ES Chapter 11: Water Environment (Doc Ref. 5.1).
Mole Valley District Council	The suggested under-capacity in the pumping system and pollution storage lagoons in times of heavy rainfall must be addressed	There is no baseline under-capacity in the pumping system nor the storage lagoons as summarised in ES Chapter 11: Water Environment (Doc Ref. 5.1). An assessment of the impact on water quality is provided in Section 11.9 in ES Chapter 11: Water Environment (Doc Ref. 5.1) that includes an explanation of the mitigation included in the Project to address increased use of deicer due to the Project.

Consultee	Details	How/where addressed in ES
Mole Valley District Council	The cumulative effects on water supply from the Project and other known development in the area are considered through the EIA	Cumulative effects are considered in Section 11.11 of the ES Chapter 11: Water Environment (Doc Ref. 5.1) and within ES Chapter 20: Cumulative Effects and Inter-Relationships (Doc Ref. 5.1).
Reigate and Banstead Borough Council	We question whether there is enough evidence/ justification at this stage to screen out changes in water quality at European designated sites	This is addressed in ES Appendix 11.9.2: Water Framework Directive Compliance Assessment (Doc Ref. 5.3).
Reigate and Banstead Borough Council	We would however welcome additional clarity as to whether consideration of potential for increased run-off during the operational phase is proposed to be assessed as part of potential contamination impacts	The potential increase in flows due to an increase in hardstanding/impermeable areas is considered in ES Appendix 11.9.6: Flood Risk Assessment (Doc Ref. 5.3). An assessment of the impact on water quality is given in Section 11.9 and 11.11 (ES Chapter 11: Water Environment (Doc Ref. 5.1))
Reigate and Banstead Borough Council	References to saved Borough Local Plan policies Ut4 “Flooding” and Ut3 “Foul and Surface Water” should be removed	Noted and reference is made to local planning policies relevant to the Water Environment in ES Appendix 11.2.1: Summary of Local Planning Policy – Water Environment (Doc Ref. 5.3).
Reigate and Banstead Borough Council	The Burstow Stream and Burstow Stream Tributary are incorrectly labelled as ‘non-main river’ when they are actually identified by the Environment Agency as main rivers	Burstow Stream is a Main River and Burstow Stream Tributary is an ordinary watercourse until it crosses under A23, this figure has been updated as ES Figure 11.6.1 (Doc Ref. 5.2).
Reigate and Banstead Borough Council	With regards to the proposed study area, the Council notes that Paragraph 7.5.72 [of the scoping report] states that “ <i>the study area will generally be defined by a 2km radius beyond the Project site boundary</i> ”. The Council considers that it is unclear what the justification is for the delineation of this study area	Additional information has been provided in this ES on the definition of the study area in paragraphs 11.4.5 to 11.4.11 (ES Chapter 11: Water Environment (Doc Ref. 5.1)). Burstow Stream is a Main River, Burstow Stream Tributary is an ordinary watercourse until it crosses under A23.
Reigate and Banstead Borough Council	It is unclear from the information provided in the EIA as to whether this [Upper Mole] model has been prepared in consultation with the Environment Agency and whether it has the agreement of the Environment Agency with regards to its robustness/ methodology	The Upper Mole hydraulic model has been developed collaboratively by GAL and the Environment Agency. The additional modelling undertaken by GAL to assess the impact of the Project will be reviewed by the Environment Agency as part of their review of the FRA. This approach is stated in ES Appendix 11.9.6: Flood Risk Assessment (Doc Ref. 5.3).
Reigate and Banstead Borough Council	We expect this evidence document [Reigate & Banstead SFRA] to be acknowledged and given due regard in the EIA	The sources of information pertinent to the Project and potential receptors are set out in ES Appendix 11.9.6: Flood Risk Assessment (Doc Ref. 5.3).
Reigate and Banstead Borough Council	Crawley Borough Council, Reigate & Banstead Borough Council and Mid Sussex District Council are in the process of undertaking a water cycle study, that could inform the ES	The Water Cycle Study dated August 2020 and January 2021 addendum have informed the ES assessment, see Table 11.3.1 (ES Chapter 11: Water Environment (Doc Ref. 5.1)).
West Sussex County Council	Reference should be made to the West Sussex LLFA Policy for the Management of Surface Water.	Refer to ES Appendix 11.9.6: Flood Risk Assessment (Doc Ref. 5.3).
West Sussex County Council	LLFAs do not hold data regarding unlicensed groundwater and surface water abstractions.	Noted.

2 Glossary

2.1 Glossary of terms

Table 2.1.1: Glossary of Terms

Term	Description
AEP	Annual Exceedance Probability
CBC	Crawley Borough Council
CIRIA	Construction Industry Research and Information Association
DCO	Development Consent Order
EIA	Environmental Impact Assessment
EIASR	Environmental Impact Assessment Scoping Report
ES	Environmental Statement
FCA	Flood Compensation Area
FRA	Flood Risk Assessment
GAL	Gatwick Airport Limited
HDC	Horsham District Council
LLFA	Lead Local Flood Authority
MSDC	Mid Sussex District Council
NPPF	National Planning Policy Framework
NPS	National Policy Statement
NRP	Northern Runway Project
PEIR	Preliminary Environmental Information Report
PINS	Planning Inspectorate
RoFSW	Risk of Flooding: Surface Water
SCC	Surrey County Council
SESW	Sutton and East Surrey Water
SRN	Strategic Road Network
STW	Sewage Treatment Works
SuDS	Sustainable Drainage Systems
TW	Thames Water
TWG	Topic Working Group
UKCP09	UK Climate Projections 2009
UKCP18	UK Climate Projections 2018
WFD	Water Framework Directive
WwTW	Wastewater Treatment Works