

The Planning Inspectorate
Major Applications and Plans
Temple Quay House
Temple Quay
Bristol
BS1 6PN

Our ref: 20044454
Your ref: TR020005
Date: 5 June 2024

Dear Planning Inspectorate Team

Gatwick Airport Northern Runway Development Consent Order Application - Environment Agency comment on Change 4: Provision of an on-airport Wastewater Treatment Works. Deadline 5, 6 June 2024

We have reviewed the submission of the proposed Project Change 4 relating to the provision of an on-airport Wastewater Treatment Works (WWTW) and have the following comments to make.

The new treatment facility would require a bespoke environmental permit with a full assessment and review by our Permitting team and would likely be a matter of significant public interest. It would introduce another discharge into the Mole of material previously discharged via Crawley Sewage Treatment Works (STW) to the Gatwick Stream. We are unsure whether this could be granted in an area which is served by an established sewerage network.

From www.gov.uk
Discharges to surface water:

Planning new developments

If you're planning a new development, plan your foul sewerage at an early stage and consult with the local council and sewerage undertaker. If you got planning permission on the basis that the development will be connected to the public foul sewer, this indicates it's likely to be reasonable to do so.

We will not normally give you a permit for use of a private sewage treatment system based on the nearest public foul sewer not having enough capacity. If necessary, you should agree improvements to the sewerage network with the sewerage undertaker so you can connect to it. These improvements must be put in place before the development is occupied. This reflects planning practice guidance and building regulations.

It was apparent at the Hearing (ISH7) on 1 May 2024 there was some work to be done on overall modelling before Thames Water were comfortable with the proposal.

Environment Agency
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There is potential for a permit application to be considered if there is no capacity in the network or sufficient treatment capacity and Thames Water have no plans to make treatment capacity available to cover the development.

The non-attendance of Sutton and East Surrey Water at the hearing created some concern regarding clean water provision to the development – We have asked the applicant to update the current situation regarding this element since there is a potential environmental impact should the increased requirement cause supply issues.

The information supplied regarding the potential new facility lacks detail. For example, flows, population equivalent. We have asked the applicant to confirm how has the planned layout been sized.

The flow profile for an international airport with near 24-hour operation would differ from a normal domestic STW.

We have also requested confirmation of the following:

- If this would be foul sewage only or whether there would be other contributory sources (trade effluent).
- What is the specific treatment process?
- Would chemical dosing be required as part of the process?

If a permit application was successful, options include the inclusion of an improvement condition stating that connection to the sewerage network would be required at the point at which capacity became available or if Thames Water adopt the facility in the future.

Flood Implications

We will ask the applicant to confirm whether:

- The proposed WWTW facility is located outside of areas considered to be at risk to flooding
- The proposed WWTW facility would not lead to a loss of floodplain storage capacity or impact on flood flow routes
- The proposed WWTW would be designed to carry on functioning during a flood event? What Flood Risk Vulnerability Classification has been given to the proposed WWTW in line with Annex 3 of the National Planning Policy Framework, considering Table 2 of the Flood Risk & Coastal Change Planning Practice Guidance
- The temporary construction compounds will be located outside of areas considered to be at risk to flooding

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- The movement of flows from the catchment of Horley WWTW to Crawley WWTW will have any impact on onwards flows to the river catchment(s) and if the volume of flows be likely to have any impact on flood peaks in different rivers.

The document states that they propose to use a directional drilling technique to install a new outfall into the River Mole to have a lesser impact on the flood defence. It should be noted that any works in, over, under or within 8 metres of the top of the bank of a main river, or within 8 metres of the landward toe of a flood defence would require assessment under the Environmental Permitting Regulations 2016 to understand whether a Flood Risk Activity Permit(s) would be required for the proposed WWTW.

Within the 'Second Notification of a Proposed Project Change' document (Book 10), it appears that the WWTW will be located outside of the fluvial flood risk areas according to modelling provided by Gatwick Airport Limited, but it would be helpful to see confirmation of this since it does appear the site is located within our Flood Map for Planning.

If you have any questions, please do not hesitate to contact me.

Yours sincerely

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