



Gatwick Airport Northern Runway Project

Statement of Common Ground Between Gatwick Airport Limited and Thames Water – Tracked Version

Book 10

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1 Introduction

- 1.1.1 This Statement of Common Ground (SoCG) has been prepared in support of the examination phase for the proposed Gatwick Northern Runway Project (NRP). The Application was made by Gatwick Airport Limited (the Applicant) to the Secretary of State for the Department for Transport (the Secretary of State) pursuant to Section 37 of the Planning Act 2008 (PA 2008).
- 1.1.2 The Application comprises alterations to the existing northern runway which, together with the lifting of the current restrictions on its use, would enable dual runway operations. It also includes the development of a range of infrastructure and facilities which, with the alterations to the northern runway, would enable an increase in the airport's passenger throughput capacity. This includes substantial upgrade works to certain surface access routes which lead to the airport. A full description of the Proposed Development is included in **ES Chapter 5: Project Description** (Doc Ref. 5.1).
- 1.1.3 SoCGs are an established means in the planning process of allowing all parties to identify and focus on specific issues that may need to be considered during the Examination. The purpose and possible content of SoCG is detailed in the Department for Communities and Local Government's guidance entitled 'Planning Act 2008: examination of applications for development consent' (2015), stating:
- "A statement of common ground is a written statement prepared jointly by the applicant and another party or parties, setting out any matters on which they agree. As well as identifying matters which are not in real dispute, it is also useful if a statement identifies those areas where agreement has not been reached. The statement should include references to show where those matters are dealt with in the written representations or other documentary evidence."*
- 1.1.4 The SoCGs between the Applicant and the local authorities comprises several documents, to which this document is one. The Statement of Commonality provides details of the structure and status of the SoCG between all the relevant Interested Parties, including the local authorities. Naturally, the level of detail across the suite of SoCG varies to reflect the nature and complexity of the matter, as well as the position between the parties.
- 1.1.5 This document solely relates to matters between the Applicant and Thames Water. A summary of the meetings and correspondence that has taken place between the parties is detailed in **Appendix 1** of this document.
- 1.1.6 The engagement between the parties across the breadth of matters is ongoing. Therefore, the SoCG is an evolving document and the detailed wording within it is still being discussed in detail between the parties. Future iterations will be submitted at each deadline; and both parties reserve the right to supplement the matters identified discussions progress, to ensure it is comprehensive and up to date.
- 1.1.7 This SoCG has been produced to confirm to the Examining Authority (ExA) where agreement has been reached between the parties, and where agreement has not (yet) been reached, and is presented in a tabular form. This SoCG does not seek to replicate information that is available elsewhere, either within the Application and/or Examination documents, referring out where

appropriate. The terminology used within the SoCG to reflect the status between the parties is either:

- “Agreed” to indicate where a matter has been resolved to the satisfaction of the parties.
- “Not Agreed” to indicate a final position where parties cannot agree.
- “Under discussion” to indicate where matters are subject of on-going discussion with the aim to either resolve or refine the extent of disagreement between the parties.

1.1.8 It can be assumed that any matters not specifically referred to in Section 2 of this SoCG are not of material interest or relevance to Thames Water; and therefore, have not been the subject of any discussions between the parties. As such, those matters should be assumed to be agreed, unless otherwise raised in due course by any of the parties.

2 Current Position

2.1. Agricultural Land Use and Recreation

2.1.1 **Table 2.1** sets out the position of both parties in relation to agricultural land use and recreation matters.

Table 2.1 Statement of Common Ground – Agricultural Land Use and Recreation Matters

Reference	Matter	Stakeholder Position	Gatwick Airport Limited Position	Signposting	Status
<i>There are no issues relating to Agricultural Land Use and Recreation within this Statement of Common Ground.</i>					

2.2. Air Quality

2.2.1 Table 2.2 sets out the position of both parties in relation to air quality matters.

Table 2.2 Statement of Common Ground – Air Quality Matters

Reference	Matter	Stakeholder Position	Gatwick Airport Limited Position	Signposting	Status
<i>There are no issues relating to Air Quality within this Statement of Common Ground.</i>					

2.3. Capacity and Operations

2.3.1 Table 2.3 sets out the position of both parties in relation to capacity and operations matters.

Table 2.3 Statement of Common Ground – Capacity and Operations Matters

Reference	Matter	Stakeholder Position	Gatwick Airport Limited Position	Signposting	Status
<i>There are no issues relating to Capacity and Operations within this Statement of Common Ground.</i>					

2.4. Climate Change

2.4.1 **Table 2.4** sets out the position of both parties in relation to climate change matters.

Table 2.4 Statement of Common Ground – Climate Change Matters

Reference	Matter	Stakeholder Position	Gatwick Airport Limited Position	Signposting	Status
<i>There are no issues relating to Climate Change within this Statement of Common Ground.</i>					

2.5. Construction

2.5.1 Table 2.5 sets out the position of both parties in relation to construction matters.

Table 2.5 Statement of Common Ground – Construction Matters

Reference	Matter	Stakeholder Position	Gatwick Airport Limited Position	Signposting	Status
<i>There are no issues relating to Construction within this Statement of Common Ground.</i>					

2.6. Cumulative Effects and Interrelationships

2.6.1 Table 2.6 sets out the position of both parties in relation to cumulative effects and interrelationships matters.

Table 2.6 Statement of Common Ground – Cumulative Effects and Interrelationships Matters

Reference	Matter	Stakeholder Position	Gatwick Airport Limited Position	Signposting	Status
<i>There are no issues relating to Cumulative Effects and Interrelationships within this Statement of Common Ground.</i>					

2.7. Draft DCO and Explanatory Memorandum

2.7.1 **Table 2.7** sets out the position of both parties in relation to Draft DCO and Explanatory Memorandum matters.

Table 2.7 Statement of Common Ground – Draft DCO and Explanatory Memorandum Matters

Reference	Matter	Stakeholder Position	Gatwick Airport Limited Position	Signposting	Status
	Thames Water has made several comments on the DCO drafting relating to protective provisions for their assets. GAL has responded to these comments to explain how the DCO deals with the matters raised. Discussions are now ongoing between GAL and Thames, and an update will be provided by the time of the Compulsory Acquisition Hearing.				

2.8. Ecology and Nature Conservation

2.8.1 Table 2.8 sets out the position of both parties in relation to ecology and nature conservation matters.

Table 2.8 Statement of Common Ground Matters

Reference	Matter	Stakeholder Position	Gatwick Airport Limited Position	Signposting	Status
<i>There are no issues relating to Forecasting and Need within this Statement of Common Ground.</i>					

2.9. Forecasting and Need

2.9.1 Table 2.9 sets out the position of both parties in relation to forecasting and need matters.

Table 2.9 Statement of Common Ground – Forecasting and Need Matters

Reference	Matter	Stakeholder Position	Gatwick Airport Limited Position	Signposting	Status
<i>There are no issues relating to Forecasting and Need within this Statement of Common Ground.</i>					

2.10. Geology and Ground Conditions

2.10.1 **Table 2.10** sets out the position of both parties in relation to geology and ground conditions matters.

Table 2.10 Statement of Common Ground – Geology and Ground Conditions Matters

Reference	Matter	Stakeholder Position	Gatwick Airport Limited Position	Signposting	Status
<i>There are no issues relating to Geology and Ground Conditions within this Statement of Common Ground.</i>					

2.11. Greenhouse Gases

2.11.1 Table 2.11 sets out the position of both parties in relation to greenhouse gases matters.

Table 2.11 Statement of Common Ground – Greenhouse Gases Matters

Reference	Matter	Stakeholder Position	Gatwick Airport Limited Position	Signposting	Status
<i>There are no issues relating to Greenhouse Gases within this Statement of Common Ground.</i>					

2.12. Health and Wellbeing

2.12.1 Table 2.12 sets out the position of both parties in relation to health and wellbeing matters.

Table 2.12 Statement of Common Ground – Health and Wellbeing Matters

Reference	Matter	Stakeholder Position	Gatwick Airport Limited Position	Signposting	Status
<i>There are no issues relating to Health and Wellbeing within this Statement of Common Ground.</i>					

2.13. Historic Environment

2.13.1 **Table 2.13** sets out the position of both parties in relation to historic environment matters.

Table 2.13 Statement of Common Ground – Historic Environment Matters

Reference	Matter	Stakeholder Position	Gatwick Airport Limited Position	Signposting	Status
<i>There are no issues relating to Historic Environment in this Statement of Common Ground.</i>					

2.14. Landscape, Townscape and Visual

2.14.1 Table 2.14 sets out the position of both parties in relation to landscape, townscape and visual matters.

Table 2.14 Statement of Common Ground – Landscape, Townscape and Visual Matters

Reference	Matter	Stakeholder Position	Gatwick Airport Limited Position	Signposting	Status
<i>There are no issues relating to Health and Wellbeing within this Statement of Common Ground.</i>					

2.15. Major Accidents and Disasters

2.15.1 Table 2.15 sets out the position of both parties in relation to major accidents and disasters matters.

Table 2.15 Statement of Common Ground – Major Accidents and Disasters Matters

Reference	Matter	Stakeholder Position	Gatwick Airport Limited Position	Signposting	Status
<i>There are no issues relating to Major Accidents and Disasters within this Statement of Common Ground.</i>					

2.16. Noise and Vibration

2.16.1 **Table 2.16** sets out the position of both parties in relation to noise and vibration matters.

Table 2.16 Statement of Common Ground – Noise and Vibration Matters

Reference	Matter	Stakeholder Position	Gatwick Airport Limited Position	Signposting	Status
<i>There are no issues relating to Noise and Vibration within this Statement of Common Ground.</i>					

2.17. Planning and Policy

2.17.1 **Table 2.17** sets out the position of both parties in relation to planning and policy matters.

Table 2.17 Statement of Common Ground – Planning and Policy Matters

Reference	Matter	Stakeholder Position	Gatwick Airport Limited Position	Signposting	Status
<i>There are no issues relating to Planning and Policy within this Statement of Common Ground.</i>					

2.18. Project Elements and Approach to Mitigation

2.18.1 **Table 2.18** sets out the position of both parties in relation to project elements and approach to mitigation matters.

Table 2.18 Statement of Common Ground – Project Elements and Approach to Mitigation Matters

Reference	Matter	Stakeholder Position	Gatwick Airport Limited Position	Signposting	Status
<i>There are no issues relating to Project Elements and Approach to Mitigation within this Statement of Common Ground.</i>					

2.19. Socio-Economics and Economics

2.19.1 Table 2.19 sets out the position of both parties in relation to socio-economics and economics matters.

Table 2.19 Statement of Common Ground – Socio-Economics and Economics Matters

Reference	Matter	Stakeholder Position	Gatwick Airport Limited Position	Signposting	Status
<i>There are no issues relating to Socio-Economics and Economics within this Statement of Common Ground.</i>					

2.20. Traffic and Transport

2.20.1 Table 2.20 sets out the position of both parties in relation to traffic and transport matters.

Table 2.20 Statement of Common Ground – Traffic and Transport Matters

Reference	Matter	Stakeholder Position	Gatwick Airport Limited Position	Signposting	Status
<i>There are no issues relating to Traffic and Transport within this Statement of Common Ground.</i>					

2.21. Waste and Materials

2.21.1 Table 2.21 sets out the position of both parties in relation to waste and materials matters.

Table 2.21 Statement of Common Ground – Waste and Materials Matters

Reference	Matter	Stakeholder Position	Gatwick Airport Limited Position	Signposting	Status
<i>There are no issues relating to Waste and Materials in this Statement of Common Ground.</i>					

2.22. Water Environment

2.22.1 Table 2.22 sets out the position of both parties in relation to water environment matters.

Table 2.22 Statement of Common Ground – Water Environment Matters

Reference	Matter	Stakeholder Position	Gatwick Airport Limited Position	Signposting	Status
Baseline					
<i>There are no issues relating to the baseline for this topic within this Statement of Common Ground.</i>					
Assessment Methodology					
2.22.2.1	Foul Water Discharge TWUL require the Applicants calibrated and verified wastewater hydraulic model to understand the potential impacts on their infrastructure (network and treatment works)	Foul Water Discharge: TWUL needs to be provided with the Applicant’s modelled foul water flows and needs to understand the impact of the change in these (as a result of the development) on TWUL’s network. The Applicant’s hydraulic model should be calibrated and verified by Gatwick Airport to WaPUG/TWUL standards prior to using it to understand the foul flows. The programme for delivering the likely strategic upgrade works as a result of the Applicant’s proposal should not be underestimated and will be significant (in the order of 3-5 years from when the appropriate information is supplied). TWUL therefore requests the above modelled flows in accordance with these timeframes as a minimum, but ideally much before this. TWUL will request a requirement on the outcome of the DCO outlining that no additional foul water flows from the development can be discharged until the modelled flows are agreed and the network upgrades implemented.	<p>GAL and TWUL agree that the modelling undertaken for the DCO meets the CIWEM Urban Drainage Group Code of Practice for the Hydraulic Modelling of Urban Drainage Systems sufficiently to provide a good representation of flows from Gatwick into Thames’ receiving infrastructure, so as to inform the assessment of effects from the Project as reported in the ES Chapter 11. Nevertheless, it is agreed that a verified model should be created so that the capacities of the receiving infrastructure (process and network) can be assessed and verified to Thames’ internal modelling standards.</p> <p>GAL has agreed with Thames to fund a two-Phase modelling exercise to be undertaken in 2024.</p> <p>Phase 1 of the modelling study will provide an interim assessment of the “headroom” available at Crawley and Horley Sewage Treatment Works (STW) using baseline and with-project flows, by end of March 2024. The results of the study will be submitted into the DCO examination process.</p> <p>Phase 2 of the modelling study will involve flow surveys, drop tests, load surveys and other information to allow validation of the models and confirm the results of the Phase 1 work. It is hoped it will be able to report initial findings in August 2024 before the conclusion of the examination process.</p> <p>Updated position (Deadline 5) An update on progress with the studies is set out at item 2.22.5.1.</p>	ES Chapter 11: Water Environment [APP-036]	Under discussion
Assessment					
2.22.3.1	Surface Water Discharge TWUL needs confirmation that any surface water discharge as a result of the	Surface Water Discharge: TWUL needs confirmation that any surface water discharge as a result of the development will not be contaminated and will adhere to the sequential approach of the discharge of surface water as noted in the “National Standards For Sustainable Drainage Systems” document published by DEFRA. If there is any proposed increase in surface water runoff TWUL will need to know this in advance	All surfaces treated with glycol have drainage directed to the Airport’s pollution storage lagoons. There are some small catchments (a section of road and runoff from roofs) which connect into the foul network. The component projects of the NRP will reduce such flows. The NRP includes a proposal for the airport	n/a	Under discussion Response awaited from Thames Water.

Reference	Matter	Stakeholder Position	Gatwick Airport Limited Position	Signposting	Status
	development will not be contaminated.	(with the same timescales as for the foul flows). There are particular concerns as to how glycol-contaminated surface water will be managed if it exceeds permissible discharge levels.	to install infrastructure to increase surface water runoff storage to ensure no increase in flood risk to other parties and treatment. Updated position (Deadline 5): GAL coordinated a presentation to Thames Water personnel on surface water management, the operation of the proposed engineered wetland treatment system, and overall drainage strategies for NRP on 28 March 2024. A response to the above is now awaited from Thames Water.		
2.22.3.2	Drainage Strategies TWUL requires an integrated water and drainage strategy (including details of points of connection to the existing sewer network).	Drainage Strategies: TWUL requires an integrated water and drainage strategy (including details of points of connection to the existing sewer network) detailing how the Applicant intends to deal with all water and wastewater generated on the site. TWUL will request a requirement be added to any potential DCO outcome that these strategies are provided and agreed to by TWUL prior to the modelling noted above.	Information on the foul and surface water drainage proposals for the Project are included in the DCO application, see: <ul style="list-style-type: none"> ES Chapter 11: Water Environment Flood Risk Assessment ES Appendix 11.9.7 Wastewater Assessment <p>A series of meetings are taking place between the parties to assist Thames with understanding the surface water and foul water drainage strategies.</p> <p>Updated position (Deadline 5): GAL coordinated a presentation and site visit for Thames Water personnel on existing and proposed surface water management, the operation of the proposed engineered wetland treatment system, and overall drainage strategies for NRP on 28 March 2024. A response to the above is now waited from Thames Water.</p>	ES Chapter 11: Water Environment [APP-036] Flood Risk Assessment [AS-078] ES Appendix 11.9.7: Wastewater Assessment [APP-150]	Under discussion Response awaited from Thames Water.
Mitigation and Compensation					
2.22.4.1	Trade Effluent Discharge Prior to the development, TWUL will need to fully understand how the Applicant's on-site plant to treat contaminated surface water will function	Prior to the development, TWUL will need to fully understand how the Applicant's on-site plant to treat contaminated surface water will function. TWUL will also need to understand what the change will be in peak volumes and concentrations of the effluent from the glycol treatment process to TWUL's network. Further clarity must also be provided on, what happens to the discharge in the event of certain conditions such as where the proposed treatment plant fails or is hydraulically overloaded.	The DCO application included provision for a new MBBR treatment facility located at the pollution lagoons adjacent to the Thames Crawley STW to treat surface water runoff potentially contaminated with de-icer. A Change Application to employ a reed bed treatment system as a more sustainable alternative to MBBR technology, has now been submitted to the Planning Inspectorate. Either system will completely remove the need to send glycol contaminated waters to Thames CSTW. Updated position (Deadline 1): The change to the water treatment works has since been accepted by the Examining Authority in its Rule 8 Letter.	Rule 8 Letter [PD-011]	Response awaited from Thames Water. Under discussion

Reference	Matter	Stakeholder Position	Gatwick Airport Limited Position	Signposting	Status
			<p>Updated position (Deadline 5): GAL coordinated a presentation to Thames Water personnel on surface water management, the operation of the proposed engineered wetland treatment system, and overall drainage strategies for NRP on 28 March 2024. A response to the above is now waited from Thames Water.</p>		
Other					
2.22.5.1	<p>Asset Review</p> <p>TWUL will require an asset review prior to any works within 5 metres of existing TWUL assets</p>	<p>TWUL will require an asset review prior to any works within 5 metres of existing TWUL assets.</p>	<p>Will be progressed via discussions on protective provisions.</p> <p>Updated position (Deadline 5): GAL and Thames' legal advisors have been in discussion to progress completion of Thames Water's "Rainbow document" in relation to protected provisions for Thames' assets and the drafting of the DCO. GAL provided comments to Thames on 17 May 2024, and received the updated response on 4 June 2024. This has closed out several points and GAL will now review and respond to the comments on remaining items and provide a further update at Deadline 6.</p>	n/a	<p>Under discussion Under discussion.</p>
2.22.5.2	<p>Future TWUL Infrastructure Capacity</p> <p>TWUL to confirm to GAL whether their network and Horley and Crawley sewage treatment works will have sufficient capacity to convey and treat the wastewater flows forecast by the NRP in the next five years to AMP8 2030.</p>	<p>In progress and to be updated in due course.</p>	<p>Updated position (Deadline 5): The Applicant has attempted to engage with Thames Water to understand the effects of the Gatwick project on the Thames network and Sewage Treatment Works process capacity over some years.</p> <p>This engagement and the information that GAL has provided to Thames Water has thus far failed to yield a coherent and holistic assessment from Thames Water and consequently no report from Thames Water on the likely scale and feasibility of any upgrades required which would enable either the Applicant or the Examining Authority to understand this.</p> <p>The Applicant acknowledges that TW have conducted an appropriate Network (pipework) detriment study to show the effects of the project and the headline outputs have been shared with the Applicant – the results of this are outlined below.</p> <p>But TW have yet to produce a study of the processing facilities (treatment plants) that clearly identifies the impacts of the project disaggregated from all other background growth assumptions and distinguishing between the future baseline growth of the airport and the with-project (NRP) case (as has been done in the Network Study). This is urgently required from TW.</p>	n/a	<p>Under discussion</p>

Reference	Matter	Stakeholder Position	Gatwick Airport Limited Position	Signposting	Status
			<p><u>In the absence of any assessment from Thames Water the Applicant has summarised the results of the Phase 1 Arcadis Network study and used Thames Water’s own process/hydraulic calculation spreadsheet (which was provided as an embedded worksheet within a summary presentation) to provide some indicative conclusions. What follows is, therefore, the Applicant’s own interpretation of the information provided to it by Thames Water. This will need to be discussed further with them and it is acknowledged that the conclusions will need to be confirmed in due course with reference to the flow and load studies the Applicant has commissioned from Thames Water but which have thus far been delayed from being undertaken, again by Thames Water.</u></p> <p><u>Phase 1 Network Study (by Arcadis for Thames).</u> <u>Thames presented the results of its Phase 1 Network capacity assessment to Gatwick on 22 May 2024 and provided an Executive Summary on 4 June 2024. The work appears to have been progressed professionally to a high standard. It assumes the same split of flows to each receiving network as modelled by Gatwick. Its summary conclusions are that there is no detriment to the Horley Network caused by the project, and relatively minor works would be necessary to upgrade the Crawley network and provide storage at Crawley STW, to cater for the additional flows from the Project.</u></p> <p><u>The Thames (Arcadis) hydraulic modelling has used 2047 flows as a worst case.</u></p> <p><u>For the Crawley network</u> the Thames (Arcadis) Phase 1 Network Study indicates that extra capacity will be required in the network downstream of the connection point between the airport and the Thames’ sewer to Crawley STW, and extra storage located at the STW itself, in both future baseline and with the Project.</p> <p><u>For the “with Project” scenario the Thames (Arcadis) modelling indicates the Crawley network detriment could be resolved by upsizing around 100m of the pipe east of the connection point from 750mm to 900mm and providing additional storage of 1500m³ at the Crawley STW. An alternative option to the above will be to explore the possibility of creating the storage within Gatwick’s own network, and this possibility will be examined within Phase 2 of the study.</u></p>		

Reference	Matter	Stakeholder Position	Gatwick Airport Limited Position	Signposting	Status
			<p><u>For the Horley network the Phase 1 Thames (Arcadis) network modelling study shows no network detriment as a result of the Project. For note, the study also looked at an alternative option where flows from the catchment east of the airport were not diverted towards Crawley (as they are proposed to be for the Project). This showed that there would be no issues with the network to Crawley STW, but this scenario would result in more significant issues to the network to Horley STW (which would also occur in the future baseline case). Overall, therefore, the current NRP strategy to divert flows east of the railway towards Horley is favoured from the network capacity point of view.</u></p> <p><u>Assessment of Sewage Treatment Process and Hydraulic Capacity, Horley and Crawley – Phase 1</u> <u>Thames Water’s assessment of treatment process and hydraulic capacity is being progressed in-house and is less advanced than for the Arcadis Network study.</u></p> <p><u>Thames had supplied a range of flow splits to the Applicant but not those aligned with the Phase 1 (Arcadis) network study and had not provided information on the baseline (ie without NRP) capacity.</u></p> <p><u>GAL has therefore used Thames Water’s own calculation spreadsheet to undertake a high-level assessment of the effects of the Northern Runway Project alone with no other catchment growth assumed for future baseline and assessment cases, and for the same split of flows assumed in the Phase 1 (Arcadis) network study (53% Crawley / 47% Horley for the future baseline and 70% to Crawley STW, 30% to Horley STW).</u></p> <p><u>Process capacity</u></p> <ul style="list-style-type: none"> <u>For the future baseline case (i.e. no NRP), calculations based on the Thames spreadsheet show that process capacity at Horley will be exceeded in approximately 2024 if both catchment growth and increases in airport passenger numbers are taken into account;</u> <u>For the with-NRP case that includes the diversion of East of Railway flows from Horley to Crawley, calculations based on the Thames spreadsheet show that process</u> 		

Reference	Matter	Stakeholder Position	Gatwick Airport Limited Position	Signposting	Status
			<p><u>capacity at Horley would be exceeded in approximately 2030;</u></p> <ul style="list-style-type: none"> • <u>For the future baseline case (i.e. no NRP), calculations based on the Thames spreadsheet show that process capacity at Crawley (including upgrades in progress) will be exceeded in approximately 2044</u> • <u>For the NRP case that includes the diversion of East of Railway flows from Horley to Crawley, calculations based on the Thames spreadsheet show that process capacity at Crawley (including upgrades in progress) will be exceeded in approximately 2037;</u> <p><u>Hydraulic capacity</u> <u>GAL has reviewed Thames' assumptions on the hydraulic capacities of the works and will engage on these with Thames in due course. The following is a summary of the position using calculations based on the methodology used in the- Thames spreadsheet:</u></p> <ul style="list-style-type: none"> • <u>For the future baseline case (i.e. no NRP), the Thames spreadsheet shows that there is hydraulic capacity at Horley until at least 2046 even if both catchment growth and increases in airport passenger numbers are taken into account.</u> • <u>For the future baseline case (i.e. no NRP) the Thames spreadsheet shows that there is hydraulic capacity at Crawley until approximately 2045 if the observed peaking factor is used. However, calculations using the standard peaking factor indicate that the hydraulic capacity (even allowing for the upgrades in progress) is already exceeded;</u> • <u>For the NRP case that includes the diversion of East of Railway flows from Horley to Crawley, the Thames spreadsheet shows that there is hydraulic capacity at Horley until at least 2046 even if both catchment growth and increases in airport passenger numbers are taken into account.</u> • <u>For the NRP case that includes the diversion of East of Railway flows from Horley to Crawley, the Thames spreadsheet shows that there is hydraulic capacity at Crawley until approximately 2044 if the observed peaking factor is used. This is one year earlier than for the without-NRP case. However, calculations using the standard peaking factor indicate that the hydraulic capacity (even</u> 		

Reference	Matter	Stakeholder Position	Gatwick Airport Limited Position	Signposting	Status
			<p>allowing for the upgrades in progress) is already exceeded.</p> <p>GAL will review the above with Thames and provide a further update at Deadline 7.</p>		
2.22.5.3	<p>Future TWUL Infrastructure Capacity</p> <p>TWUL to confirm to GAL whether their network and Horley and Crawley sewage treatment works will have sufficient capacity to convey and treat the wastewater flows forecast by the NRP in the next five years to AMP9 2035.</p>	In progress and to be updated in due course.	<p>Updated position (Deadline 5): This remains under discussionIn progress and to be updated in due course. – see 2.22.5.2</p>	n/a	Under discussion
2.22.5.4	<p>Future TWUL Infrastructure Capacity</p> <p>TWUL to confirm to GAL whether their network and Horley and Crawley sewage treatment works will have sufficient capacity to convey and treat the wastewater flows forecast by the NRP in the next five years to AMP10 2039.</p>	In progress and to be updated in due course.	<p>Updated position (Deadline 5): This remains under discussion – see 2.22.5.2In progress and to be updated in due course.</p>	n/a	Under discussion
2.22.5.5	<p>Future TWUL Infrastructure Capacity</p> <p>TWUL to confirm to GAL whether their network and Horley and Crawley sewage treatment works will have sufficient capacity to convey and treat the wastewater flows forecast by the NRP in the next five years to AMP11 2044</p>	In progress and to be updated in due course.	<p>Updated position (Deadline 5): This remains under discussion – see 2.22.5.2In progress and to be updated in due course.</p>	n/a	Under discussion
2.22.5.6	<p>Future TWUL Infrastructure Capacity</p>	In progress and to be updated in due course.	<p>Updated position (Deadline 5):</p>	n/a	Under discussion

Reference	Matter	Stakeholder Position	Gatwick Airport Limited Position	Signposting	Status
	TWUL to confirm to GAL whether their network and Horley and Crawley sewage treatment works will have sufficient capacity to convey and treat the wastewater flows forecast by the NRP in the next five years to AMP12 2049		This remains under discussion – see 2.22.5.2 In-progress and to be updated in due course.		

3 Signatures

3.1.1 The above SoCG is agreed between the following:

Duly authorised for and on behalf of Gatwick Airport Limited, The Applicant	Name
	Job Title
	Date
	Signature
Duly authorised for and on behalf of Thames Water	Name
	Job Title
	Date
	Signature

Appendix 1: Record of Engagement Undertaken

Date of communication, and those attending.	Form of Contact (meeting or correspondence)	Overview of the Matters Discussed and Key Outcomes
29 March 2019	Meeting	Meeting was held upon request of Gatwick Airport Ltd (GAL) in relation to the draft Masterplan for Gatwick.
18 December 2019	Meeting	Meeting objective was to understand available capacity at Horley WTW and Crawley WTW and understand how growth would be accommodated, to share current assumptions and understand TWUL assumptions for future. GAL would limit increase flow to Horley treatment works, aim for no additional load from the pollution lagoons to Crawley WwTW, and decouple storm water from the foul network where possible.
25 February 2020	Meeting	This meeting discussed respective views of GAL's consultants and Thames regarding the level of analysis that is needed for Thames to understand GAL's inputs to its infrastructure.
13 March 2020	GAL Northern Runway Project paused due to Covid 19 pandemic.	
December – March 2020,	Thames undertake surveys of GAL's assets to input into their own model.	
17 June 2021	Meeting	GAL shared expected peak dry and wet flows at both STWs in the future, noting that NR would reduce wet flows due to drainage improvements. Thames were looking to increase the capacity of the Crawley STW to meet local housing growth. GAL requested Thames share the results of its analysis of Gatwick flows to understand Thames' views on the future capacities of Horley and Crawley STWs.
16 July 2021	Meeting	Discussions on process modelling.
28 January 2022	Meeting	GAL confirmed there would be no increase in trade-effluent flows from the pollution lagoons.

Date of communication, and those attending.	Form of Contact (meeting or correspondence)	Overview of the Matters Discussed and Key Outcomes
27 May 2022	Meeting	GAL introduced a proposal for a new water treatment works, located on the site of Rolls Farm to the east of the Crawley Sewage Treatment works. It would treat water from the pollution lagoons so as to lower their level and effectively increase their capacity. Thames updated GAL on its progress with a catchment study and planned works at the Crawley Wastewater Treatment Works. Thames would confirm whether the present planned upgrades to the CSTW would accommodate Gatwick's needs, or whether further upgrades would be required in the next AMP cycle.
22 November 2022	Meeting	Meeting discussed that modelling on the inlet works at Crawley STW had completed. The key issue for Thames was from potential housing developments being promoted by Homes England.
4 April 2023	Meeting	Discussions regarding modelling.
5 July 2023	Gatwick submits DCO for its Northern Runway Project to the Planning Inspectorate.	
21 November 23	Meeting	This meeting reviewed Thames' general objections to the DCO. GAL agreed to fund the necessary work for Thames to review the effects of the NRP Project.
28 November 23	Meeting	This meeting reviewed the modelling undertaken to support the Northern Runway Project. Agreement to work together to develop a scope to review the effects of the NRP on Thames' infrastructure.
15 December 23	Meeting	This meeting discussed the availability of data from Gatwick's model and how it could be used, and also the assumptions that Thames had made in relation to Gatwick in its responses to the Local Plan process and OFWAT.
15 January 24	Meeting	This meeting reviewed Thames draft scope for undertaking a network capacity study over two phases, to inform on the NRP's effects to the networks feeding Crawley and Horley. It was agreed that the first phase of the Study would report by 1 March 23, and Phase 2 by 1 August 2023. Phase 1 would provide for a high level analysis of the headroom capacity of Horley and Crawley network and works, and phase 2 would entail validating

Date of communication, and those attending.	Form of Contact (meeting or correspondence)	Overview of the Matters Discussed and Key Outcomes
		the modelling using survey data on the Gatwick network to Crawley, and on the Horley network downstream of Gatwick. Modelling data from Gatwick's NRP modelling would be used to inform the assumed flows into the receiving networks.
28 March 2024	Presentation and site visit	GAL provided a presentation to explain the drainage strategies for the development and proposal for the Engineered Wetland Treatment System. A site visit to Pond D and to the existing Pollution Storage Lagoons and site of the proposed Engineered Wetland.
20 May 2024	Letter (attached as Annex).	Letter from GAL to Thames placing on record that Thames had not provided Gatwick with an initial assessment of the impact of the development as the analysis undertaken did not use the forecast future passenger throughput for Gatwick's NRP or assess the proposal to redirect flows from the catchment to the east of the railway line, from Horley STW, to the Crawley STW.
22 May 2024	Meeting	This meeting reviewed the results from the Phase 1 study to establish effects of the NRP to Thames' network. It also discussed Thames' internal modelling of process capacity headroom at the Crawley and Horley Sewage Treatment Works.
30 May 2024	Provision of process modelling presentation	Provision of presentation used at meeting of 22 May 24
3 June 2024	Provision of network modelling presentation	Provision of presentation used at meeting of 22 May 24; Executive Summary of Arcadis modelling report followed on 4 June 24.

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20 MAY 2024

Mr. Robert Ashiley
Thames Water - Major Projects
Clearwater Court
Vastern Road
Reading
RG1 8DB

By email;
cc: Martin Perrin, Director of Wastewater Asset Strategy and Planning (TWUL).

Dear Robert,

Gatwick Airport Northern Runway Project DCO

We've been trying to establish from Thames for some time now what the effects of the Northern Runway Project (NRP) are on the receiving Sewage Treatment Works (STWs) at Crawley and Horley, which will provide the other half of the picture to the network modelling currently underway with your consultants Arcadis.

We have now seen Thames' written response to Examining Authority question WE1.8 (REP3-149) which states:

"Process Modelling and Future Upgrades

An initial assessment of the impact of the development on both Horley and Crawley STWs has been completed and was provided to GAL on 8th April 2024. To complete a detailed assessment, more field data is being collected".

We wish to place on record that Thames have not provided Gatwick with an initial assessment of the impact of the development: specifically, since the analysis undertaken by [REDACTED] does not use the forecast future passenger throughput for Gatwick's Northern Runway Project and nor does it assess the proposal to redirect flows from the catchment to the east of the railway line, from Horley STW, to the Crawley STW.

We have been trying to engage with you on these matters for some time without a substantive response. Our desire is to understand the baseline and with-scheme assessment for future years, whether these flows can be accommodated in the current network and plants, what if any upgrades may be required and how these may correlate with Thames' OFWAT regulatory periods.

We request again that Thames undertakes the analysis we have repeatedly asked for, which is to provide us with an interim assessment of process capacity headroom using Thames' standard Airport PE/Passenger assumption for the "with" and "without the Northern Runway Project" scenarios in future years, taking account of realistic catchment growth. In order to match with the network assessment this should also consider the impact of not adopting the proposed strategy of diverting some airport flows



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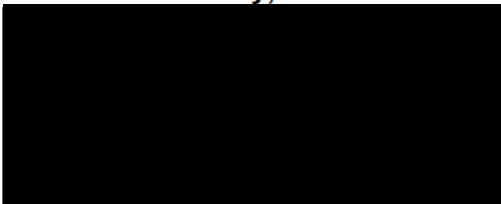
from Horley to Crawley (this was your own suggestion for the network study scope).

We have made available experienced modellers to assist Thames as necessary with any questions regarding the NRP proposals. We do not understand the apparent reluctance to do this analysis, particularly given that we have already committed to funding the flow and load surveys which will validate it.

We have also been advised on 14 May 2024 that the Phase 1 network study has been completed but your consultants, Arcadis, will not release it to you until in receipt of a Purchase Order from Thames. We would hope there is no further delay in doing this as we have made full payment in good faith upfront for this element of work on 15 May 2024. We would also hope that Thames is able to commence the flow and load confirmation surveys as soon as possible thereafter, given that a purchase order has been in place to do this since February 2024.

Can you please respond as soon as possible and advise if the requested analyses will be available this week so that we can discuss them together and move forward constructively?

Yours Sincerely,



Jonathan Deegan,
Planning & Environment Lead
Gatwick Northern Runway Project



Jonathan Deegan
Planning & Environment Lead

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