



Gatwick Airport Northern Runway Project

Response to Rule 17 Letter – Waste Management Assessment

Book 10

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1 Introduction

1.1. Purpose of this Document

1.1.1 The purpose of this document is to respond to the Examining Authority's request for further information as set out in question R17b.2 relating to the waste management assessment [[PD-018](#)].

1.1.2 In Question R17b.2 the Applicant is asked:

1. To demonstrate compliance with the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 (hereafter referred to as the EIA Regulations) Schedule 4 Paragraph 5(c), the Applicant is asked to either:
 - provide a description of the likely significant effects resulting from the creation, disposal and recovery of waste; or
 - justify why an assessment of likely significant effects for waste has not been undertaken for waste impacts, other than those agreed to be scoped out, by demonstrating that the Proposed Development would result in no likely significant effects
2. To confirm whether there are any other waste arisings (for example metal, plastic and packaging as noted from the Scoping Report) that should have a type and quantity listed in the ES project description in order to meet the EIA Regulations.

2 Assessment of Waste

2.1. Demonstrate Compliance with the EIA Regulations

Background

2.1.1 The Applicant agrees with the ExA's comments that waste arisings from the construction processes required for the Proposed Development or waste arisings from the operational phase were not scoped out of the environmental impact assessment under the **Scoping Opinion**. This response demonstrates compliance with the EIA Regulations by explaining that a description of the likely significant effects resulting from the creation, disposal and recovery of waste is included across the Environmental Impact Assessment (satisfying limb (a) of the ExA's request) and confirming that any potential residual impacts would be mitigated by the waste management plans so as to result in no likely significant effects and therefore do not require an individual assessment (satisfying limb (b) of the ExA's request). A detailed sign-posting document to the various areas of the Environmental Statement will be submitted at Deadline 6 to provide the ExA with an extra level of detail on this point.

2.1.2 The Applicant's proposed approach to assessing waste was set out in section 7.13 of the **Scoping Report** [[APP-092](#)]. The Scoping Report stated that a waste management strategy, including a Site Waste Management Plan, would be produced and included as a technical appendix to the Environmental Statement (ES) and that a separate waste chapter was not proposed in the Preliminary Environmental Information Report (PEIR) or the ES. The Scoping Report explained the Application would include a description of the revised published data and project design information, a review of the National and regional waste management policies and

objectives and a search of the waste management facilities in the vicinity of Gatwick Airport should waste be exported from the site. It gives an indicative view of the types of waste likely to be generated in construction and operation of the Project. Critically, in paragraph 7.13.10 it explains that there are other environmental topics (specifically air quality and traffic) which will be aligned with the waste assumptions.

- 2.1.3 In the **Scoping Opinion** [APP-095] the Inspectorate did not disagree with the proposed approach to the waste assessment (as set out in the **Scoping Report** [APP-092] i.e. that a separate waste chapter would not be included in the PEIR or ES). The Inspectorate agreed with scoping out waste arising from the extraction, processing and manufacture of the construction materials and components (ID 4.13.1). In addition, the Inspectorate recognised the importance of the interaction with the assessment of specific environmental topics in ID 4.13.3. Further comments were focused on what information the Applicant should include in describing the baseline waste generation and how waste is managed at the airport; how the Applicant should consider impacts from the relocation of the CARE facility; and specifying that the Applicant should set out how any mitigation measures would be secured.

References to the waste assessment

- 2.1.4 The following section describes how the Applicant has complied with the specific aspects of the EIA Regulations.

Provide a description of the likely significant effects resulting from the creation, disposal and recovery of waste

Construction waste

- 2.1.5 The generation of waste from the construction of the Project is principally reported in the Construction Resources and Waste Management Plan (**ES Appendix 5.3.2: Code of Construction Practice Annex 5** [REP4-009]). The Plan explains the key activities that will generate waste (e.g. from the demolition of buildings and structures, from earthwork activities and the construction of new buildings and structures). Further information on how construction activities will be undertaken is provided in the **ES Chapter 5: Project Description** [APP-030] and **ES Appendix 5.3.1 Buildability Report** [APP-079 to 081]. The design of the new buildings and structures is not at the detailed stage to provide specific waste types and quantities, however the likely types of key wastes to be generated from the Project are included in **ES Appendix 5.3.2: CoCP Annex 5 Construction Resources and Waste Management Plan** [REP4-009]. This list of wastes has also been informed by other construction projects at the Airport.
- 2.1.6 The likely significant effects of construction waste generated by the Project are not reported within a distinct waste chapter of the ES (as explained in paragraphs 2.1.2 and 2.1.3 of this document). However, information and assumptions from **ES Appendix 5.3.2: CoCP Annex 5 Construction Resources and Waste Management Plan** [REP4-009] and other construction projects at the Airport have been incorporated into the assessments of other environmental topics within the ES. The potential impacts associated with construction waste that have been assessed by other environmental topics in the ES include:
- construction traffic on the highway network associated with the Project (including the transport of waste from the site) **ES Chapter 12: Traffic and Transport** [APP-037];
 - increase in air emissions from the Project construction traffic **ES Chapter 13: Air Quality** [APP-038];

- increase in road traffic noise **ES Chapter 14: Noise and Vibration** [[APP-039](#)];
- dust emissions from the on-site management of waste (e.g concrete crushing) **ES Chapter 13: Air Quality** [[APP-038](#)];
- construction noise impacts including on-site waste management activities **ES Chapter 14: Noise and Vibration** [[APP-039](#)];
- visual impacts of temporary construction compounds including the stockpiles of crushed materials **ES Chapter 8: Landscape, Townscape and Visual Receptors** [[APP-033](#)].

2.1.7 With regards to construction traffic, the assessment of construction scenarios for are covered within the **Transport Assessment** [[REP3-058](#)] and the **ES Chapter 12: Traffic and Transport** [[REP3-106](#)]. The effects of vehicles transporting waste are not considered independently from other construction vehicles, with many of the heavy goods vehicles used for moving materials onto the airport, expected to then be used for the movement of waste from the airport. GAL estimates that around 60% of these heavy goods vehicles leaving the site, would be transporting construction waste. This would equate to circa 15 vehicles per hour leaving the airport via the strategic road network. This represents a very small number of HGV movements when considered in the context of both the airport operations and the volume of vehicles on the strategic road network. These assumptions have been used to inform the assessments of air quality (**ES Chapter 13 – Air Quality** [[APP-038](#)]) and noise (**ES Chapter 14- Noise and Vibration** [[APP-039](#)]).

2.1.8 The Applicant confirms that the impacts of construction waste have been assessed in the EIA process. A signposting document will be prepared for Deadline 6 to provide further details of how potential impacts from construction waste have been included in the assessments of environmental topics within the ES and the conclusion of the assessments in relation to waste.

Operational waste

2.1.9 The Airport currently generates waste from its operations as an airport. This waste is managed at the CARE facility: traffic movements, air emissions and noise from the CARE facility form part of the baseline assessments within **ES Chapter 4: Existing Site and Operation** [[APP-029](#)]. Operational waste from the Project will be managed alongside the existing levels of operational waste from the Airport; both through the replacement CARE facility.

2.1.10 When the DCO Application was submitted a description of the replacement CARE facility was provided in **ES Chapter 5: Project Description** [[APP-030](#)]. The parameters and use of the replacement CARE facility were assessed and reported in topic chapters in the ES. The potential impacts associated with operational waste that were assessed by other environmental topics in the ES at the time of submission of the DCO Application include:

- visual impacts from the proposed biomass boiler stack **ES Chapter 8: Landscape, Townscape and Visual Receptors** [[APP-033](#)];
- air emissions from the biomass boiler **ES Chapter 13: Air Quality** [[APP-038](#)];
- operational traffic (including the movement of waste) **ES Chapter 12: Traffic and Transport** [[APP-037](#)].

2.1.11 Since the submission of the DCO Application, the design of the replacement CARE facility has changed (e.g. the removal of the biomass boiler stack). The changes to the design were set out in the **Change Application Report** [[AS-139](#)] which also includes a description of any implications to the assessment conclusions within the ES as a result of this design change. It confirmed that

there were no changes to the ES conclusions. The change to the design of the replacement CARE facility has been accepted into the examination (**Rule 8 letter- Notification of timetable for the Examination** [\[PD-011\]](#)).

- 2.1.12 An **Operational Waste Management Strategy** [\[REP3-070\]](#) has also been prepared. The strategy provides information on the types and quantities of operational waste in the baseline, future baseline and with the Project scenario.
- 2.1.13 In terms of operational waste vehicles, Table 4 of the **Change Application Report** [\[AS-139\]](#) explained that there would be fewer than six vehicle trips a day associated with the replacement Central Area Recycling Enclosure (CARE) facility when in operation. This level of traffic is not expected to be perceptible on the highway network, regardless of the location of processing sites or the routes taken between those and the Airport, and would have no material impact on the outcomes of the assessment presented in **ES Chapter 12: Traffic and Transport** [\[REP3-016\]](#).
- 2.1.14 The Applicant confirms that the impacts of operational waste from the Project have been assessed in the EIA process. A signposting document will be prepared for Deadline 6 to provide further details of how potential impacts from operational waste have been included in the assessments of environmental topics within the ES and updated assessments submitted in response to design change, together with the conclusion of the assessments in relation to waste.

Justify why an assessment of likely significant effects has not been undertaken for waste impacts, other than those agreed to be scoped out, by demonstrating that the Proposed Development would result in no likely significant effects

- 2.1.15 Any residual scope for significant environmental effects of waste would be mitigated through the implementation of measures set out in the **Construction Resources and Waste Management Plan** [\[REP4-009\]](#) and the **Operation Waste Management Strategy** [\[REP-030\]](#). The Construction Resources and Waste Management Plan is secured by DCO Requirement 7 and the Operational Waste Management Strategy is secured by DCO Requirement 25.
- 2.1.16 The scope of these documents is in accordance with Scoping Report [\[APP-092\]](#) and the Scoping Opinion [\[APP-095\]](#). The Construction Resources and Waste Management Plan [\[REP4-009\]](#) sets out measures for managing waste and resources during construction to meet legislative and policy requirements. The measures in the Construction Resources and Waste Management Plan [\[REP4-009\]](#) will be implemented through Site Waste Management Plans which will record decisions made in the detailed design stage to avoid/minimise waste and how waste is being managed during the construction process. A template of the Site Waste Management Plan is included as an annex to Construction Resources and Waste Management Plan [\[REP4-009\]](#).
- 2.1.17 The Operational Waste Management Strategy [\[REP3-070\]](#) explains how operational waste is currently managed, how waste volumes are predicted to change as a result of the Project and how the future operational waste will be managed. The measures in the Operational Waste Management Strategy will be implemented through an Operational Waste Management Plan which will be approved by West Sussex County Council as the relevant waste authority for operation pursuant to DCO Requirement 25.
- 2.1.18 Therefore, an assessment of the residual scope for significant environmental effects of waste has not been undertaken for waste impacts, other than those agreed to be scoped out, because the Proposed Development would result in no likely significant effects on the basis of the measures secured through two waste management plans which are secured by DCO Requirement.

2.2. Waste estimates

- 2.2.1 The Applicant confirms that other waste arisings will be generated during the construction process other than those listed in **ES Chapter 5: Project Description** [\[APP-030\]](#). A cross-reference to **ES Appendix 5.3.2: CoCP Annex 5: Construction Resources and Waste Management Plan** [\[REP4-009\]](#) is included in the **ES Chapter 5: Project Description** [\[APP-030\]](#) where further information on wastes is provided.
- 2.2.2 **ES Appendix 5.3.2: CoCP Annex 5: Construction Resources and Waste Management Plan** [\[REP4-009\]](#) provides a schedule of buildings/structures to be demolished, a schedule of building/structures to be constructed and other works all of which will generate waste. At a strategic level, the waste types from the construction and demolition wastes will be classified as inert, non-hazardous and hazardous wastes.
- 2.2.3 An initial list of wastes that will be generated from these activities has been included in the SWMP template of **ES Appendix 5.3.2: CoCP Annex 5: Construction Resources and Waste Management Plan** [\[REP4-009\]](#). The type and quantity of wastes will be refined during detailed design and will be reported in the Waste Forecasts sheets of the Site Waste Management Plans (SWMPs).
- 2.2.4 Estimates of the types and quantities of waste during the operation phase of the Project are set out in the **Operational Waste Management Strategy** [\[REP3-070\]](#).