

Communities Against Gatwick Noise Emissions (CAGNE)
Gatwick Airport Northern Runway project DCO application
PINS Reference Number: TR020005

CONSULTATION RESPONSE
PROJECT CHANGE 4

INTRODUCTION

1. This is CAGNE’s response to the Applicant’s consultation in relation to proposed Project Change 4. Project Change 4 proposes provision of an on airport Wastewater Treatment Works facility. It is proposed due to ongoing uncertainty over the timescale for Thames Water’s (“TW”) upgrade works at its treatment plants to accommodate additional waste water flows from the Northern Runway Project (“NRP”).
2. While CAGNE is supportive of the principle of provision of on airport Wastewater Treatment Works, the material provided by the Applicant does not adequately demonstrate that the facility proposed will operate effectively and fulfil its important function. Furthermore, the environmental effects require proper assessment.
3. This consultation response summarises CAGNE’s concerns under the following headings:
 - a. Uncertainty as to the Applicant’s intentions;
 - b. Lack of detail provided; and
 - c. Unassessed environmental effects.

UNCERTAINTY

4. First, the Applicant’s intentions as to Project Change 4 remain unclear. The key document outlining the Applicant’s proposals, Second Notification of a Proposed

Project Change (AS-146), starts by setting out that the on airport facility is proposed “to provide an alternative solution for wastewater treatment, should it be required for the Project.”¹

5. Accordingly, it remains unclear as to whether the Applicant’s first choice remains for the NRP to go ahead without this facility. Further, it is unclear whether the on airport facility is only proposed as an interim plant until TW has capacity to take water from a two-runway airport.²
6. The Applicant must not be able to resile from providing the on airport facility, as the ExA has not been able to assess the alternative option of using TW infrastructure due to a lack of survey data. This matter requires clarification.
7. Indeed, without an adequate on airport wastewater treatment plant, the NRP’s impacts would clearly be unacceptable, such that the development consent order (“DCO”) should not be granted. This is because the Applicant refuses to accept TW’s request for a phasing requirement in the DCO, which has been sought so that necessary upgrades can be carried out to TW’s infrastructure before further airport growth occurs. CAGNE’s detailed submissions as to why, as a matter of law, either a strict phasing requirement, or an on site wastewater facility, are necessary and appropriate are set out in its deadline 4 submissions (REP4-094).

LACK OF DETAIL

8. Secondly, while it is accepted that the Applicant will provide some further information on the proposed facility in due course, at this stage the proposals for Project Change 4 remain high-level and lacking in detail, such that proper assessment of their suitability cannot be carried out. In particular:
 - a. It remains unclear to CAGNE whether the proposed facility would only treat waste from the two terminals; or whether it would also treat waste from the additional buildings included within the NRP, such as hotels, car parks and offices.

¹ AS-146 at §1.2.2

² See e.g. AS-146 at §2.2.8

- b. The Applicant has provided no details or alternative plans to substantiate its suggestion that the removal of car parking (1,162 spaces) would be capable of accommodation in long stay car parks. Local residents are particularly concerned about the potential for more on-road parking if not adequately resolved.
 - c. The Applicant's materials do not provide any consideration of the proximity of the proposed facility to Pond M, the kennels, or the biodiversity areas.³
 - d. No information has been provided as regards the impact of high ground water levels on the proposed facility.
 - e. The Applicant proposes that the "cake" will be transported to TW's treatment plans. However, TW have not yet agreed this.⁴
 - f. The Applicant has not explained how nitrate reduction as regards discharge into the River Mole would be achieved. While the detail may not have been resolved at this stage, as a matter of principle the facility should be required to include anoxic and aerobic ("AA") or anoxic, anaerobic, and aerobic ("AAA") secondary treatment.
9. Even more fundamentally, the Applicant has yet to provide data on how much sewage the facility would treat and the flows it would discharge.
- a. The Applicant has not made clear how much sewage the on airport facility would need to accommodate. CAGNE has carried out some very basic calculations using available online resources and finds that doubling the number of passengers to 80 million a year could potentially lead to an additional average sewage provision of 375 million litres of sewage a year – equivalent to a small settlement. There would be further impacts from the additional facilities proposed, such as restaurants and hotels.
10. Furthermore, the Applicant has not made clear the expected flow of the discharge from the on-airport sewage works to the River Mole. The only reference to water quality in the Project Change 4 materials is very vague.⁵

³ See ES Figure 4.2.1c Rep1-019

⁴ AS-146 at §2.1.11

⁵ See AS-146 at §3.1.7

11. The lack of detail provided in the consultation materials also limits the utility of the consultation process itself. When the Applicant has provided no detail of the amount of waste or the throughput resulting release into the River Mole, in particular, there is limited scope for stakeholders to assess properly what is proposed.

ENVIRONMENTAL EFFECTS

12. Thirdly, linked to the lack of provision of adequate detail, the Applicant has not yet substantiated the suggestion that Project Change 4 would not give “*rise to any materially new or materially different adverse environmental effects in comparison to those assessed and reported in the Environmental Statement*”, such that The Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 (“EIA Regulations”) are not invoked.⁶

13. While CAGNE does not go so far as to say that Project Change 4 proposes an amendment that would result in an entirely new project such that it should not be allowed to proceed under the terms of Advice Note 16, it is CAGNE’s view that provision of a new on airport sewage treatment facility of the size and scale proposed is likely to have new material environmental effects, which should be properly assessed with an addendum to the Environmental Statement (“ES”).

14. In particular, it seems possible that the treated effluent would have a significant and as yet unassessed impact on the quality of the River Mole, depending on the flow and dilution capacity of the river. The potential for sewage overflow in the event of heavy rainfall and surges needs to be assessed. As do the impacts of the plant on nearby sensitive receptors, such as the biodiversity areas.

15. In addition, the on site facility, which is proposed to be operated 24/7, would have operational impacts, including additional lorry movements, and light, noise and odour pollution.⁷ While the Applicant states that the construction impacts would not be material, the supporting detail behind those assertions has not been provided.

⁶ AS-146 at §1.2.4

⁷ See AS-146 at §2.1.4, §§2.2.12-2.2.13.

16. While it is appreciated that the Applicant will provide more information in due course upon formal submission of the Project Change, it is imperative that the ES is properly updated to deal with potential impacts.

CONCLUSION

17. CAGNE does not disagree with the principle of an on airport Wastewater Treatment Works. Indeed, such a facility is necessary for the DCO to go ahead. Sufficient treatment capacity could be engineered if additional funding was made available and full scoping reports carried out. However, at present, the Applicant has not provided a clear proposal with sufficient detail to enable an understanding of whether the facility would be capable of resolving an important material consideration in deciding the acceptability of the NRP; effective treatment of waste waster resulting from passenger growth.

11th June 2024