



Gatwick Airport Northern Runway Project

The Applicant's Response to Actions
ISH8: Ecology

Book 10

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1 Introduction

1.1.1 This document provides the Applicant's response to the actions arising from Issue Specific Hearing (ISH) 8 in relation to Agenda Item 7: Ecology. The actions relevant to the Applicant are as follows:

Action No.	Action	Deadline
18	Provide BNG calculation for all land within the order limits.	Deadline 6
19	Provide update on the work to consider emissions that would be associated with the York Aviation scenarios in the context of specific ecological receptors.	Deadline 6
20	Provide update of BNG statement in relation to Crawley policy. Also to update Annex 3 of the BNG statement to provide the following columns as requested by the Local Authorities: <ul style="list-style-type: none"> • area of habitat lost • area of habitat retained • area of net gain. 	Deadline 6
21	Respond to the recommendation from Natural England that the target increase in BNG is secured in a suitably worded requirement in the DCO. Noting that the wording in the oLEMP does not currently refer to a specific percentage of BNG.	Deadline 6
22	Provide details on the impact on the River Mole arising from the change request to provide a new wastewater treatment works both in terms of flood risk and water quality.	Deadline 6

- 1.1.2 The below sections provide the Applicant's response. For actions which require a more detailed response, a reference to the appropriate document is included.

2 Action Point 18

- 2.1.1 **The Examining Authority has asked the Applicant to provide BNG calculation for all land within the order limits. The following response is provided.**

2.1.2 The order limit metric shows that the total baseline units of the order limits is circa 1,029 units with a post development score of 1,100 units – i.e. a gain of circa 70 units. This equates to a net gain around 7%.

2.1.3 A BNG Metric for the order limits has been provided at Deadline 6 (ES Appendix 9.9.2 (Doc Ref 5.3)). This does not account for strategic significance nor any delays in planting due to the mechanism by which the GIS system outputs data combining areas such that allocating such detail is not possible at this stage. From experience, these variables tend to more or less balance each other as they act on both sides of the before/after equation more or less equally. This means the overall net gain score would not change significantly should these variables be included.

2.1.4 The metric relating to the order limits therefore provides an indication of the order of magnitude of the gain if the baseline were to be those order limits rather than the area impacted by the project, as set out in ES Appendix 9.9.2 BNG Statement (Doc Ref. 5.3).

3 Action Point 19

- 3.1.1 **The Examining Authority has asked the Applicant to provide update on the work to consider emissions that would be associated with the York Aviation scenarios in the context of specific ecological receptors. The following response is provided.**

3.1.2 The Applicant proposes to submit an update (Version 2) to the **Future Baseline Sensitivity Analysis [REP5-081]** at Deadline 7 to confirm the output of the additional ecological, including HRA, appraisal of the York Low and High scenarios.

4 Action Point 20

4.1.1 **The Examining Authority has asked the Applicant to provide an update of BNG statement in relation to Crawley policy. Also to update Annex 3 of the BNG statement to provide the following columns as requested by the Local Authorities:**

- **area of habitat lost**
- **area of habitat retained**
- **area of net gain.**

The following response is provided.

4.1.2 An updated **BNG Statement** has been provided as **ES Appendix 9.9.2** (Doc Ref. 5.3) and Annex 3 to that document has been updated as requested.

5 Action Point 21

5.1.1 **The Examining Authority has asked the Applicant to respond to the recommendation from Natural England that the target increase in BNG is secured in a suitably worded requirement in the DCO. Noting that the wording in the oLEMP does not currently refer to a specific percentage of BNG. The following response is provided.**

5.1.2 The **Outline Landscape and Ecology Management Plan** (Appendix 8.8.1 to the ES) which is secured by DCO Requirement 8 has been updated to include the specific BNG percentage.

6 Action Point 22

6.1.1 **The Examining Authority has asked the Applicant to provide details on the impact on the River Mole arising from the change request to provide a new wastewater treatment works both in terms of flood risk and water quality. The following response is provided.**

6.1.2 A permit for the operation of the proposed On-airport WWTW would be required under the Environmental Permitting (England and Wales) Regulations 2016. The permit would include the requirements of all other legislation (e.g. Habitats Regulations, Urban Waste Water Treatment Regulations, Water Framework Directive etc). The permit would set chemical and biological requirements of the

discharged effluent to the River Mole to ensure no deterioration in its water quality.

6.1.3 GAL is currently liaising with the Environment Agency to understand their requirements for the quality of the discharged water which will be controlled by a water discharge activities permit.

6.1.4 The design has been based on the following criteria:

Parameter	Unit	Value	Discharge condition
BOD	mg/L	5	95%ile
NH3-N	mg/L	1	95%ile
Orthophosphate	mg/L	0.5	Annual Average

6.1.5 The construction of the outfall to the River Mole from the proposed On-airport WWTW would be subject to a Flood Risk Activity Permit (FRAP) to the Environment Agency, which would assess the flood risk implications of the additional flow. However the modelled discharge from the WWTW during a 3.33% (1 in 30) Annual Exceedance Probability event with a 20% uplift allowance for the impacts of climate change would be approximately 0.12m³/s. Based on modelling undertaken for the Project, the peak flow in the River Mole under such circumstances would be 39.4m³/s, so the proportion of the flow from the new WWTW would be 0.3% and is not considered significant.

6.1.6 The flow that would be discharged from the new WWTW facility currently drain to TWUL's Horley and Crawley Sewage Treatment Works, i.e. the flows drain to the River Mole catchment under the existing circumstances, as they would with the new WWTW.