



Horsham
District
Council



Gatwick Northern Runway Project DCO (Project Reference: TR020005)

Deadline 7 Submission -15 July 2024

**Crawley Borough Council (IP Ref: GATW-AFP107),
West Sussex County Council (IP Ref: 20044715),
Horsham District Council (IP Ref: 20044739) and
Mid Sussex District Council (IP Ref: 20044737)**

Overview

This document provides a response at Deadline 7 (15 July 2024) from the above West Sussex Joint Local Authorities comprising Crawley Borough Council, West Sussex County Council, Mid Sussex District Council and Horsham District Council (hereafter the "Authorities") on the following responses to the Applicant's Deadline 5 Submissions:

- REP6-009 - 4.5 Works Plans - For Approval Version 6 (Clean) / REP6-010 (Tracked)
- REP6-011 - 4.7 Parameter Plans - For Approval Version 4
- REP6-012 - 4.10 North and South Terminal Roundabouts BAU Improvement Scheme Plans
- REP6-013 - 5.1 Environmental Statement Chapter 5 Project Description Version 5 (Clean) / REP6-014 (Tracked)
- REP6-015 - 5.2 Environmental Statement Project Description Figures Version 4 (Clean) / REP6-016 - (Tracked)
- REP6-017 - 5.3 Environmental Statement Appendix 5.2.4 Waste Management Signposting Document
- REP6-052 - 5.3 Environmental Statement Appendix 11.9.6 Flood Risk Assessment Version 3 (Clean) / REP6-053 (Tracked)
- REP6-054 - 5.3 Environmental Statement Appendix 11.9.6 Flood Risk Assessment - Annex 7 - Culvert Assessment

- REP6-070 - 10.43 The Historical Development of Gatwick Airport including a Review of the Extent of Past Ground Disturbance
- REP6-072 - 10.47 Second Change Application Report
- REP6-073 - 10.47 Second Change Application Report - Appendix A
- REP6-074 - 10.47 Second Change Application Report - Appendix B
- REP6-075 - 10.47 Second Change Application Report - Appendix C
- REP6-076 - 10.48 Consultation Report Second Addendum
- REP6-077 - 10.48 Consultation Report Second Addendum – Appendices
- REP6-082 - 10.49.5 The Applicant's Written Summary of Oral Submissions - ISH8 – Ecology
- REP6-098 – Environment Agency – Comments on Information / Submissions received at D5

1. REP6-009 - 4.5 Works Plans - For Approval Version 6 (Clean) / REP6-010 (Tracked)

- 1.1 It is noted the works plans have been amended to include Works 44 the proposed Waste Water Treatment Works (WWTW). The Authorities do not consider that the area shown accurately reflects the extent of works associated with WWTW as the outfall to the River Mole, new rising main and pumping station which are all integral to the Works are not shown. It is considered the works plan should be adjusted to include the location of these elements.
- 1.2 It is also noted that following the review of the information provided at Deadline 6 for the WWTW that the pipeline and pumping station east of the railway is not listed in the Works Schedule in the draft DCO or on the works plans while other new pumping stations are specifically listed for example, Work 4(c) (ii) and Work 19.

2. REP6-011 - 4.7 Parameter Plans - For Approval Version 4

- 2.1 These plans also have been amended to include Works 44 (WWTW). The Authorities comments on suggested amendments to the parameter plans pages 4-7 [REP6-111] are not currently addressed by the latest iteration of parameter plans.

3. REP6-012 - 4.10 North and South Terminal Roundabouts BAU Improvement Scheme Plans

- 3.1 The Highway Authority notes the submission of the North and South Terminal Roundabouts BAU Improvement Scheme Plans [REP6-012] and the inclusion of an additional requirement in the draft Development Consent Order [REP6-007] to secure these works. The works are required to be delivered prior to the first of, the commencement of dual runway operations, commencement of the first of works numbers 35 (South Terminal junction improvements) and works number 36 (North Terminal junction improvements or the third anniversary of the commencement of the authorised development.
- 3.2 The ExA have issued ExQ2, to be responded at Deadline 7, and question TT.2.12 relates to the proposed BAU Improvement Scheme Plans at North and South Terminal Roundabouts. These works are not within WSCC's highway network and are within National Highway's network or within the Applicant's control. The ExA have asked whether there should be controlled pedestrian and cycle crossings on any elements of these design layouts.
- 3.3 Notwithstanding these works are on National Highway's network, WSCC as Highway Authority has the following views on pedestrian and cycle access. Given the nature of the road network at South Terminal Roundabout, and that there are no existing pedestrian or cycle desire lines, there is not considered to be a need for formal crossing points at this location. At North Terminal Roundabout given existing desire lines consideration could be given to pedestrian crossing improvements. These could be at North Terminal Approach, on the pedestrian desire line underneath the structure that carries the Gatwick Airport Shuttle Transit to connect into the footway that leads towards Northway. Secondly, consideration could be given for pedestrian crossing enhancements at Longbridge Way to provide a crossing over Longbridge Way that provides an onwards connection to footpath 346_2Sy. Given the location and likely use of these crossings they may not be signalised controlled crossings but footway enhancements with dropped kerbs, tactile paving and pedestrian refuges may be able to be provided.

4. REP6-013 - 5.1 Environmental Statement Chapter 5 Project Description Version 5 (Clean) / REP6-014 (Tracked)

4.1 There are no specific comments to make on this document which updates the project description in incorporate the WWTW (Works 44).

5. REP6-015 - 5.2 Environmental Statement Project Description Figures Version 4 (Clean) / REP6-016 - (Tracked)

5.1 It is noted that the clean version of these plans [REP6-015] deletes from drawing Figure 5.2.1e. the pumping station and pipeline to the east of the railway. While this infrastructure would not be required in the event the WWTW are constructed, the Authorities note the Applicants preference not to implement these works and therefore this infrastructure would be required in the event the WWTW were not implemented. These works should therefore be retained on Figure 5.2.1e and some annotation considered to denote the delivery of both as an either / or scenario.

6. REP6-017 - 5.3 Environmental Statement Appendix 5.2.4 Waste Management Signposting Document

6.1 The West Sussex Authorities have no further comments on this document, as it merely provides signposting to other Examination documentation. Where the Authorities do have outstanding concerns, these are reflected through each relevant document.

7. REP6-052 - 5.3 Environmental Statement Appendix 11.9.6 Flood Risk Assessment Version 3 (Clean) / REP6-053 (Tracked)

7.1 The Executive Summary has been updated to explain the use of a 60-year design life for the airfield works, with a 25% allowance for climate change. WSCC, as LLFA retains the position from [REP6-116] that a higher allowance of 40% should be applied to the airfield works. Comments on this are included in the Statement of Common Ground [REP5-055, Table 2.21, Reference 2.22.4.4]. This was then raised again at ISH7 [REP4-058].

7.2 The Applicant has accepted the fact that the 100-year design life for the highways elements would extend to 2132, seven years beyond the end of the 2080's epoch of 2125 and has come to a conclusion that

based on current predictions, an additional seven years of climate change beyond 2125 would not impact significantly on the assessment of flood risk for the Project. Furthermore, the Applicant has stated that a Credible Maximum Scenario (CMS) sensitivity test using a 1% AEP and 40%CC has assessed the impact of the Project in the event of climate change impacts and has shown that the additional seven years beyond 2025 would not impact significantly on the assessment of flood risk for the Project. This scenario is only known to the Applicant and there is a difference between mitigating for a 1% AEP + 20%CC and carrying out a sensitivity test using a 40%CC and mitigating using a 1% AEP+ 40%CC. Except the Applicant is trying to postulate that based on the flood map the mitigating features based on 20%CC allowance will be the same as using a 40%CC allowance. If this is not the case and in the absence of any other evidence then the Authorities would prefer the Applicant to use a 1% AEP with 40%CC to design the mitigation features. This is a more practical approach to consider for the time period between 2125 and 2132 in relation to the design of the flood compensation/mitigation strategy.

7.3 While it may be true that using a 40%CC to design the mitigation features might encroach on the available land and impact the proposal to provide additional facilities to cater for the Northern runway that is intended to be brought into operation. The Applicant has agreed that without mitigation the Project would increase flood risk to other parties due to the encroachment into and truncation of the floodplain. Therefore, the Authorities consider that need for a robust mitigation should outweigh the consideration for land take. Furthermore, the Project should not be about just doing the minimum, but the Applicant should use this opportunity to improve and provide robust mitigation features in a mitigation strategy has been developed to address this and ensure flood risk is not increased to other parties and that the development is safe for users for its lifetime.

7.4 The need to consider residual risk as a criteria and guide for the mitigation strategy is highlighted in the Applicant's response as it is stated that both the airfield and the surface access works will increase the impermeable area and that the airfield surface water mitigation demonstrates that there would be increases in flood depths on the airfield compared to the baseline. However, the safety of passengers and staff would be maintained through existing Airport response procedures as set out in the FRS. While from the Applicant's position the peak rates of discharge off-site may not increase, resulting in no increase in flood risk to other parties, this approach clearly shows that residual risk has not been taken into consideration and the Applicant is relying on existing procedure which may have to be updated or changed after the implementation of the Project as it is clearly stated in the Applicant's D6 response that the Project would increase flood risk within the airport due to encroachment and truncation of floodplain. Moreover, the consideration of residual risk is a statutory

requirement as stated in the West Sussex Authorities response at Deadline 6 Section 4, [REP6-116].

7.5 Regarding the adopted lifetime of the airfield works of 40 years, it is understood from desk top studies undertaken by CBC that much of the development that can be classified as airfield structures at Gatwick are approaching forty years in age and are currently in use. Although the Applicant has stated that a joint 100 years mitigation strategy has been developed for both the surface and airfield access works, the Authorities are requesting a categorical statement or further information on these structures will dealt with after 2072.

7.6 At Deadline 6[REP6-116], the Authorities made a case regarding the use of HEWRAT approach for water quality in response to the document produced by the Applicant at deadline 5 [REP5-026]. The Applicant states that the water quality assessment during the operational phase of the proposed Highway works has been assessed using the HEWRAT approach [REP5-026 item 2.1.3, 2.1.4 and 2.1.5], while it has decided to use the SuDS manual simple index approach to carry out the car park surface water quality assessment. It is noted that under 2.1.5 step 3 that the Applicant has proposed the use of SuDS to mitigate the potential pollution from the highway works, but that this is based on the HEWRAT assessment. Ideally, the Applicant should use the SuDS manual approach it is adopting for the car park assessment as the primary assessment tool for the proposed highway works since the mitigation features are SuDS based, but as a minimum the Applicant should use the SuDS manual assessment as a secondary control measure for the operational phase of the Highway works to prove that water quality assessment has been properly covered. This approach will also provide a common assessment tool for all water quality related matters rather than the Applicant cherry picking an assessment tool that suits them on water quality issues.

8. REP6-054 - 5.3 Environmental Statement Appendix 11.9.6 Flood Risk Assessment - Annex 7 - Culvert Assessment

8.1 The Authorities have no comments to make on this document.

9. REP6-070 - 10.43 The Historical Development of Gatwick Airport including a Review of the Extent of Past Ground Disturbance

9.1 The provision of the Historical Development of Gatwick Airport document was appreciated and provides sufficient information to allow the archaeological specialists to make informed decisions on many of

the areas of development that will now not require any further work. A follow-on meeting occurred on 31st May where the report was discussed with the Applicant's archaeological consultants and further information regarding specific areas was requested. This confidential information, largely related to services, was provided. Some development areas where concerns were raised still require limited further investigation to identify the level of survival and record the deposits if they survive. It is hoped these will be identified in the revised West Sussex WSI which the Authorities are still awaiting although this has been promised at deadline 7. This document can be agreed if the changes requested are included.

10. REP6-072 - 10.47 Second Change Application Report

The following related documents were also considered as part of the response below:

- REP6-073 - 10.47 Second Change Application Report - Appendix A
- REP6-074 - 10.47 Second Change Application Report - Appendix B
- REP6-075 - 10.47 Second Change Application Report - Appendix C
- REP6-076 - 10.48 Consultation Report Second Addendum
- REP6-077 - 10.48 Consultation Report Second Addendum – Appendices

10.1 The West Sussex Authorities provided a response to the Applicant as part of its Project Change 4 Consultation on the 11th June 2024 for its proposed provision of an on-airport Wastewater Treatment Works (WWTW). It is noted that this consultation document has been attached in full within the report Appendices [REP6-077] pages 105-117 and provides the overarching position of the Authorities to the proposed project change, these are not repeated again below. It is also noted in the Addendum [REP6-076] in Table 5 (pages 32-71) that the Applicant has sought to summarise and address the Authorities comments.

10.2 The response below **should be considered alongside the original consultation response** provided direct to the Applicant and seeks principally to address the new material that has been provided by the Applicant as part of this Project Change request.

Project Description – Lack of detail

10.3 The extent of the proposed Project Change and relative lack of detail in the consultation was raised as a concern. It is noted in [REP6-072] that a more detailed description of what comprises the Project Change has been set out by the Applicant in Paragraph 2.2.6. This additional detail is welcomed but is not considered to be accurately reflected in

the dDCO description of works [REP6—005] which simply describes the development under Works 44 as "*Works to— (a) remove existing surface car parking and associated structures; (b) construct wastewater treatment works*". This is not considered to reflect the level of development proposed which includes development beyond the Works Area including a new outfall to the River Mole, new network of waste water infrastructure within the airport, a new rising mains and a pumping station located next to the existing Gatwick Airport Police Station (the location of which is not clear on any control document). It is considered that as a minimum this new pumping station and outfall should be included within the description of works and clearly identified on a Works Plan.

Impact on Trees and landscaping

- 10.4 Due to the lack of detail, concerns remain in respect of land take and tree loss in relation to the pumping station and the impacts on the highway and rights-of-way are also unclear. 161 trees are stated as being removed as result of the works however, it is unclear if this is just from the works site or whether it includes any loss from the outfall/ pipe run / new pumping station or the knock on additional coverage of the decked car park area on adjoining area (Works site 32) which is proposed for extended decking. It is also unclear if the tree removal plans need to be updated as a result of the project change.

Lack of design and drainage detail

- 10.5 There is still no information provided on the design and appearance of these WWTW structures and in particular it remains important that clear design principles are established and set out in the Development Principles Document to address both design and drainage principles specific to the site context. These should include for example:
- the relationship to ecologically sensitive woodland and design considerations to protect this (notwithstanding the Applicants conclusion in the ES relating to no new or materially different significant effects),
 - design principles relating to the construction of the outfall and means by which its construction will safeguard the ecology in the River Mole,
 - the means of retaining the acoustic bund and delivering the outfall by trenchless construction to safeguard its acoustic integrity.
- 10.6 It is noted that these issues are not suggested by the Applicant in their Table 3 [REP6-072] for document updates and the Authorities consider these should be included. The Applicant should also consider how the detailed responses it has provided to questions raised such as

modelled discharge assumptions for the WWTW are controlled through its control documents or included within design principles.

Traffic and Transport

- 10.7 In Section 2.5 of the Second Change Application Report [REP6-072], entitled Control Documents, the Applicant sets out that, if the application is accepted by the ExA, they will submit revised versions of various control documents. In addition to those identified, the Highway Authority would query as to whether the Outline Construction Traffic Management Plan [REP5-020] would also be updated, to reflect the additional construction compounds proposed in Self Park North car park, to deliver the Wastewater Treatment Works.
- 10.8 The Applicant has undertaken a review of the proposed project change against relevant topics within the Environmental Impact Assessment, as detailed in the Environmental Statement [APP-026 to APP-217], to assess whether any significant environmental effects would occur as a result of Project Change 4. In relation to traffic and transport the Applicant concludes that Project Change 4 would not result in a material change to the environmental impacts assessed within ES Chapter 12 Traffic and Transport [REP3-016]. During the peak month of construction approximately 225 Heavy Goods Vehicles (HGVs) are expected (450 two-way movements per month). Outside of the peak month period of construction it is anticipated that there would be between 220 and 300 two-way movements a month, for seven months. At other times vehicle movements would be fewer than 80 movements a month. During the operational phase, there would be up to two lorry movements per week related to Project Change 4, meaning one arrival and one departure. The Highway Authority has no specific comments to make in relation to the forecast increase in vehicle movements, associated with Project Change 4, or the conclusions that have been drawn by the Applicant in relation to the environmental impacts of the revised proposals.

Noise

- 10.9 An assessment of construction noise has been provided in the new Appendix C [REP6-075] and this indicates that noise impacts from the construction work would be small. It is noted that the outfall is proposed to be constructed by trenchless techniques to avoid disturbing the bund, and this approach is supported from an acoustic perspective. Additional noise modelling has now been provided although the Authorities raise a number of concerns with the predictions set out in the Appendix of the report which are listed below:

- Paragraph 5.1.5 states that "*Sound power levels are derived from sound pressure specifications based on a presumption that the sound pressure levels refer to the sound level at a distance of 1 m, which are corrected by a factor of +11 dB for an assumed point source using a spherical spreading model*". This assumption of a point source is only valid where the dimensions of the sound source (blower) and significantly smaller than the distance of the measurement (in this case 1m). As this is unlikely to be the case, the true sound power of the blowers could be considerably higher than the values used in the modelling.
- No correction for the character of the sound from the blowers is included. In this case it may be appropriate to add a correction of +3dB based on the statement in BS4142 "*Where the specific sound features characteristics that are neither tonal nor impulsive, nor intermittent, though otherwise are readily distinctive against the residual acoustic environment, a penalty of 3 dB can be applied*"
- As some of the predicted rating sound levels are also within 2dB of the identified background sound levels, it seems likely these would exceed the background sound level once the above items have been considered, and further mitigation may be required to ensure that they remain below background sound levels.

Air Quality

- 10.10 There is a lack of detail in the assessment of the air quality effects of the proposed WWTW. The Applicant relies on conservative assessment for construction traffic impacts already reported in ES Chapter 13 for construction traffic/plant effects.
- 10.11 Furthermore, no odour impact assessment has been provided. The Applicant concludes no significant effects from odour based on measures incorporated into the design, which assumes that all open processes are covered for odour prevention. The Authorities would expect to see an odour impact assessment and odour management plan (to detail operational and control measures for both normal and abnormal conditions) associated with this proposal.

Drainage

- 10.12 The Applicant has stated the following regarding the new WWTW that, based on hydraulic modelling undertaken for the Project the new WWTW will be located outside the 1% (1 in 100) AEP plus 40% Credible Maximum Scenario flood extent and would therefore not remove existing flood plain or affect overland flow route, but it is also stated that the on-airport WWTW facility would require a footprint of approximately 2.2 hectares. This new facility will also displace the current arrangement for proposed car parking area, and the loss of car

parking area will be mitigated by increasing the approximate dimensions for the decked area of the proposed car park. Consequently, the location of the on -airport WWTW and the increase in the size of the car park will lead to an increase in the impermeable area. The Authorities request that the Applicant provides details of how this increase in impermeable area has been mitigated under the Pluvial mitigation plan of the DCO and if this has not been considered can the Applicant include this within the Pluvial mitigation scheme and provide an updated plan.

- 10.13 The Applicant is also requested to clarify if this new WWTW structure is identified as part of the surface access works or the airfield access works. This is important so that the Authorities can identify which life span and Pluvial climate change allowance should be used.
- 10.14 The Applicant identifies that there is a low risk of erosion at the outfall of the new WWTW to the River Mole, however design measures will be introduced to reduce the velocity and mitigate potential impacts. It is also stated in table 4 [REP6-076] that the flow that will be discharged from the new WWTW facility currently drain from TWUL's Horley and Crawley Sewage Treatment Works to the River Mole under the existing circumstances. While this is true, it is also clear that the new way the WWTW would discharge to the River Mole is under a different scenario i.e. when it was draining to TWUL's at Horley and Crawley the flow of the discharge into the River Mole is from two different locations which will most probably not be the same as it will be when discharge from a single point. It is clear that there would be an increase in the flow into the River Mole as a result of this proposal, the Applicant should look at how this increase would affect the hydraulics of the River Mole and the effects of this increase in flow to the geomorphology of the watercourse.
- 10.15 The Applicant states that the outfall structure would include a cascade feature of a series of pools to dissipate hydraulic energy prior to discharge to the River Mole to avoid erosion of the watercourse. The structure would be approximately 11m long (in the direction of the outfall pipe) from the watercourse and 3m wide at the pipe outlet fanning out to approximately 8m wide at its outfall into the watercourse. The Authorities would require a post construction certification for this outfall structure which should certify/confirm that the surface water drainage strategy has been constructed as detailed and should work as anticipated in the design. This certification should be by a third party, which must not be the consultant responsible for the design of any aspect of the outfall structure. The reason for this certification is that this outfall structure is important to the stability of the geomorphology and possible migration and erosion of the River Mole at the location where it discharges into the watercourse and

beyond, and it is important the structure is not only constructed as detailed but certified to work as intended.

Timing and delivery of the Works

10.16 The Authorities note that the Applicant only proposes to deliver these works to prevent its Project from being delayed through the suggested draft requirement from Thames Water requiring network upgrade works to be implemented prior to airport growth and concerns have been expressed in section 5.1 of the 11th June consultation response [REP6-077]. The Authorities would wish to ensure that in the event this infrastructure is required that the works are complete and fully operational in accordance with the provision of the environmental permit prior to the commencement of the dual runway operations. Draft requirement 31 needs strengthening to ensure these measures are in place, the current wording of the requirement suggests construction of the works and permit to be submitted but this doesn't imply the infrastructure is required to be operational which must be key to ensuring there is infrastructure capacity to address the passenger demand.

10.17 It is also noted that if implemented Works 44 have a knock-on effect on the drainage infrastructure elsewhere within the Project boundary (in particular there would be no need for the pumping station and pipe run to the east of the railway line). The Applicant should provide clear information in its control documents about this either /or scenario to ensure that the implications on the wider drainage airport infrastructure are clearly understood. The second change report [REP6-072] makes no reference to the pumping station east of the railway yet in the Project Description [REP6-013] paragraph 5.2.190 states this infrastructure would not be required if the WWTW is implemented. There needs to be clarity on precisely how the drainage infrastructure will operate with and without Works 44. It is noted that the infrastructure east of the railway is not included in the list of Works in Schedule 1, or its location and extent identified on any works plan. It has also been removed from plan 5.2.1 e [REP6-015 and REP6-016].

11. REP6-082 - 10.49.5 The Applicant's Written Summary of Oral Submissions - ISH8 – Ecology

11.1 The Authorities maintain the position that a simple desktop exercise could identify potential opportunities to create new habitats to enhance wildlife corridors in the landscape surrounding the Order limits. The Authorities consider this is required for four reasons:

1.The need to maintain habitat connectivity across the Project Site and wider landscape.

2.The potential for impacts on riparian habitats downstream of the Airport, including the spread of non-native aquatic species, such as Himalayan balsam and signal crayfish.

3.Ecological impacts cannot be fully mitigated within the Project Site due to restrictions on tree planting, woodland and pond creation associated with 'airport safeguarding' constraints. Therefore, off-site compensation is required.

Whilst the habitat creation at Brook Farm, Longbridge Roundabout and elsewhere within the DCO Limits is acknowledged, it provides insufficient compensation for the loss of some habitats. The loss of over 5 ha of mature broadleaved woodland and two ponds is of particular concern.

4.The need for off-site Biodiversity Net Gain (BNG). As ecological impacts on some habitats, including mature broadleaved woodland and ponds, cannot be fully mitigated within the DCO Limits, it follows that a BNG of at least 10% of all habitats is also unattainable without some off-site BNG.

11.2 In summary, habitat creation and enhancement, and improved habitat connectivity, should extend beyond the confines of the Project boundary to strengthen key wildlife corridors, such as the River Mole and Gatwick Stream.

12. REP6-098 – Environment Agency – Comments on Information / Submissions received at D5

12.1 In their review of The Applicant's Response to Deadline 4 Submissions [REP5-072], the Environment Agency have stated that they would support WSCC as LLFA in ensuring that WSCC have enough information to be satisfied with the proposed management of surface water. This is in relation to Water Environment Section 2.16 WE 1.6 of [REP5-072], which refers to the design life of the airfield works and the climate change allowance that has been used. WSCC, as LLFA, retains the position from [REP6-116] that a higher allowance of 40% should be applied to the airfield works. Comments raised on this are included in the Statement of Common Ground [REP5-055], Table 2.21, Reference 2.22.4.4). This was then raised again at ISH7 [REP4-058].