



# Gatwick Airport Northern Runway Project

Response to the Examining Authority's Written Questions  
(ExQ2) – Water Environment

**Book 10**

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## 1 Response to the Examining Authority’s Written Questions – Water Environment

1.1.1 The below table sets out the Applicant’s response to the Examining Authority’s Written Questions relating to Water Environment.

ExQ2 Question to: Question:		
WATER ENVIRONMENT		
WE.2.1	SES Water	<p><b>Water Supply</b></p> <p>The Applicant [REP4-037] submitted a copy of an email of 9 February 2024 setting out that SES Water’s water sources and infrastructure would be able to meet the predicted demands from the Project.</p> <p>The ExA would like direct confirmation from SES Water that it is satisfied the company will be able to meet the water supply requirements of both the possible Future Baseline and the Proposed Development scenarios.</p>
		<p>N/A – this question is not directed at the Applicant.</p>
WE.2.2	Applicant Thames Water	<p><b>Crawley and Horley Wastewater Treatment Works (WTW)</b></p> <p>In the SoCG between the Applicant and Thames Water [REP5-064] at item 2.22.5.2 the Applicant provides an interpretation of the position with respect to the capacity of the Thames Water infrastructure.</p> <p>The ExA wants to understand:</p> <ul style="list-style-type: none"> <li>• When an accurate assessment of the ability of Crawley and Horley WTW to accommodate additional flows from both the Future Baseline and Proposed Development scenarios will be available;</li> <li>• An understanding of any upgrade works that would be required to accommodate both scenarios and the likely timescales for delivery; and</li> </ul>

		<ul style="list-style-type: none"> <li>• How any necessary works would be secured.</li> </ul> <p>The Applicant considers that it is for Thames Water (TW), as the relevant sewerage undertaker and owner of the network assets, to provide a view on the exact nature of any processing plant upgrade works and the likely timescales for delivery, as well as how any necessary works would be secured.</p> <p>However, the following points are intended to be helpful to the ExA in respect of explaining the work being jointly progressed by the Applicant and TW, to help TW understand the effects of the NRP on TW's receiving network and processing infrastructure.</p> <ol style="list-style-type: none"> <li>1. The parties have agreed the scope of a two phase study into network capacity and processing capacity impacts from the Project.</li> <li>2. The studies will determine how both the future baseline growth and the anticipated Project growth affect TW's assets and how the proposed diversion strategy included in the Applicant's proposals (diverting some airport flows currently going to Horley toward Crawley instead) affects the Project case.</li> <li>3. Phase 1 of the study is being conducted on currently available information and delivered within the timescales of the examination to assist an understanding of the likely outcome for how future wastewater flows arising from the airport may be managed by TW.</li> <li>4. Phase 2 of the study will verify the outcomes of the Phase 1 study by conducting further survey work to confirm or amend the inputs used in the Phase 1 study and allow TW to determine conclusively how all assets may need to be upgraded.</li> <li>5. The Applicant has committed to funding both phases of the studies.</li> <li>6. The Phase 1 "network" study (conducted by Arcadis on behalf of TW and funded by the Applicant) is complete and concludes that there is a need for modest upgrades to the Crawley network locally to the airport, and no upgrades being required to the Horley network connections (assuming that the Applicant's</li> </ol>
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		<p>proposed diversion strategy is agreed by TW). The Applicant assumes that TW will make this study available to the examination in answer to ExA’s question WE 2.3.</p> <p>7. The Phase 1 "processing" study is not yet complete and results from the in-house TW team are awaited which align with the agreed scope and scenarios (as have been covered in the network study). Specifically, the analysis undertaken by TW to date has not used the forecast future passenger throughput resulting from the Project and it has also not assessed the proposal to redirect flows from the catchment to the east of the railway line from Horley STW to the Crawley STW. The Applicant assumes that TW will make an updated version of this study available to the examination in answer to this ExA’s question WE 2.2.</p> <p>8. It is GAL's understanding, based on TW's submissions (see the response to first written question WE1.8 <a href="#">[REP3-149]</a>), is that the Phase 2 studies are less developed than the Phase 1 studies, and the results of them are unlikely to be available in the Examination..</p> <p>9. In the interim, TW have requested a DCO requirement which conditions airport growth as a result of the Project coming forward until modelled wastewater flows have been agreed by TW and any necessary upgrade works to TW’s network and processing facilities have been implemented.</p> <p>10. Whilst GAL is happy to work with TW to inform its assessment and any to understand necessary upgrade works required (which will also depend on other planned developments and growth in the local catchment area that is not linked to either the airport or the Project), it is not prepared, and does not consider it to be justifiable or necessary to condition the delivery of the Project on the agreement of a phasing plan and the delivery of any upgrade works. The Applicant considers that this would place an unacceptable constraint and delivery risk on the Project.. The Applicant has already provided Thames with projected ATM and passenger growth for the baseline and for NRP in every year to 2047, as part of the input assumptions to the Phase 1 and 2 studies.</p> <p>11. It is in this context that the Applicant has promoted Project Change 4 – the On-site WWTW. This change is being promoted by the Applicant in response to the ongoing uncertainty regarding the nature of any</p>
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		<p>potential upgrade works, to avoid the unacceptable situation whereby the growth associated with the Project is made conditional on the delivery of any upgrade works by TW (should the Secretary of State be minded to agree with TW that such a requirement is necessary). Section 2.3 of the <b>Change Application Report</b> [<a href="#">REP6-072</a>] sets out in detail the discussions to date between the Applicant and TW, which have driven the need for the Second Change Application to be made. .</p> <p>12. The DCO requirement proposed in respect of the On-airport WWTW currently anticipates it being required to be in place before the commencement of dual runway operations, unless agreement is otherwise reached with TW (see requirement 31(3) in the Draft DCO (Doc Ref. 2.1). That qualification recognises the Applicant’s preference to reach agreement with TW on mutually acceptable terms.</p> <p>13. The Applicant notes that it is open to continued dialogue and working with TW, to identify a solution where the growth of the Airport enabled by the Project can be understood by TW in the context of wider catchment growth and enable them to bring forward in good time any necessary enhancements to their infrastructure in accordance with their statutory obligations under Section 94 of Water Industry Act 1991. If the Applicant and TW reach agreement on a resolution which does not require the delivery of the On-airport WWTW, then GAL will update the examination accordingly.</p>
WE.2.3	Applicant  Thames Water	<p><b>Public Sewer Network Capacity</b></p> <p>In the SoCG between the Applicant and Thames Water [<a href="#">REP5-064</a>] at item 2.22.5.2 the Applicant provides an interpretation of the position with respect to the capacity of the Thames Water infrastructure. The ExA wants to understand;</p> <ul style="list-style-type: none"> <li>• When an accurate assessment of the public sewer network to accommodate additional flows from both the Future Baseline and Proposed Development scenarios will be available?;</li> <li>• An understanding of any upgrade works that would be required to accommodate both scenarios and the likely timescales for delivery; and</li> </ul>

		<ul style="list-style-type: none"> <li>• How any necessary works would be secured?</li> </ul> <p>The Applicant considers that it is for Thames Water, as the relevant sewerage undertaker and owner of the network assets, to provide a view on the exact nature of any network upgrade works and the likely timescales for delivery, as well as how any necessary works would be secured.</p> <p>As noted in the response to WE 2.2 above, the Applicant assumes that TW will make the Arcadis study into network impacts arising from growth at the airport available to the examination in answer to this ExA's question.</p> <p>Also as stated in the response to WE2.2 above, the Applicant notes that it is open to continued dialogue and working with TWUL, to identify a solution where the growth of the Airport enabled by the Project can be understood by Thames Water in the context of wider catchment growth and enable them to bring forward in good time any necessary enhancements to their infrastructure in accordance with their statutory obligations under Section 94 of Water Industry Act 1991.</p>
WE.2.4	Applicant  Environment Agency	<p><b>Change Request – New onsite Wastewater Treatment Works</b></p> <p>The Environment Agency position as set out in the SoCG [REP5-057] in item 2.22.3.13 states that, <i>“The new treatment facility would require a bespoke environmental permit with a full assessment.”</i> It goes on to state that, <i>“The Environment Agency will not normally give you a permit for use of a private sewage treatment system based on the nearest public foul sewer not having enough capacity.”</i></p> <p>Explain whether a permit would be likely to be granted and if so would any restrictions be imposed on the permit relating to the public sewer network being upgraded.</p> <p>The Applicant and the EA are in an ongoing dialogue in relation to the On-airport WWTW being promoted as Project Change 4, including in relation to the permits that would be required to construct and operate the facility. There is no in principle reason why the Applicant would be precluded from applying for (and being granted) a permit for the On-airport WWTW. It is noted that the application and decision making process for</p>

environmental permits sits outside of the DCO Application, with the EA being the decision maker on any permit application and having the ability to place conditions on the grant of any permit. The Applicant has also been exploring the possibility of the On-airport WWTW (if it is brought forward) being constructed and operated by a New Appointments and Variations (NAV) company appointed by Ofwat. The Applicant is happy to consider this further with the EA (and Ofwat).

The Applicant further notes that this change is being requested at this stage as an 'alternative', but not preferred, option in the DCO Application were the Secretary of State to be minded to include a Requirement in the Draft DCO that specifies that no airport growth arising from the Project can be implemented (and wastewater flows discharged) until modelled wastewater flows have been agreed by TWUL and any necessary upgrade works to TW's network and processing facilities have been implemented. Delivery of the facility would remove the need for this Requirement and remove the risk that GAL is unable to commence dual runway operations prior to a third party (TW) delivering upgrades to its own infrastructure and network. This position is set out in further detail in sections 1.2 and 2.3 of the **Change Application Report** [[REP6-072](#)]. It remains the Applicant's preferred position to reach an agreement with TWUL that means that the Applicant would not be responsible for delivering the WWTW. As stated in WE2.2 and WE2.3, the Applicant remains open to continued dialogue and working with TW, to reach a solution where the growth of the Airport enabled by the Project will not have a detrimental impact on TWUL's local sewerage network and wastewater treatment facilities.