

The Planning Inspectorate  
Major Applications and Plans  
Temple Quay House  
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Bristol  
BS1 6PN

**Our ref:** KT/2024/131869/01  
20035862  
**Your ref:** TR020005  
**Date:** 7 August 2024

Dear Planning Inspectorate Team

**Gatwick Airport Northern Runway Application Development Consent Order  
Deadline 8, 7 August 2024 - Environment Agency response**

- **Comments on any further information/submissions received by Deadline 7**
- **Comments on responses to ExQ2**

We have reviewed the submissions and have the following comments to make.

**Design and Access Statement – Appendix 1 - Design Principles July 2024**

DBF62 and DBF63. We note the mention the construction of a 300mm high weir on the southern entrance of the eastern box of the runway culvert, and then the creation of a fish pass on the weir under Work No. 42.

DDP2 has been reworded in this version to our suggested wording from Deadline 5.

DDP4 had been reworded in this version to our suggested wording from Deadline 5.

DDP13 has been updated to highlight the location of the syphons related to the taxiway and noise bund works. In addition, the Works Nos as set out in the draft DCO to which these syphons related are also listed, which is welcomed.

DDP19 has been updated to make specific reference to the syphons beneath the noise mitigation feature in the north-western area (Works No.18).

DLP16 discusses the active travel path culverts and has been updated to state that these will be determined through the detailed design process for the project. Further work will be required on this aspect of the project in the future to understand if these culverts will be needed to ensure floodplain connectivity.

**Applicants Response to Deadline 6 Submissions July 2024**

Section 4.1.2 – We note and welcome the changes to the wording of previous

DBF25 (now DBF58). We also note and welcome the changes to DDP2 and DDP4.

Section 4.1.3 – We note this comments about the information set out in Table 6.3 EA Appendix 11.9.6: Flood Risk Assessment Annex 5: River Mole Fluvial Model Build Report.

Section 4.1.6 – We welcome that the flood conveyance syphons are being considered as an integral part of the design works for several parts of the proposed works. Reference is made within Appendix 1 Response on Design Matters Version 1.0 dated July 2024 to amendments to Schedule 1 Draft DCO to add specific reference to Works No. 4 and 18 to the syphons, which is welcomed.

Amendments have also been made to the Design and Access Statement – Appendix 1 - Design Principles to reflect comments we have previously made on the syphons. DDP13 and 19 now make specific reference to the provision of syphons, which is welcomed.

We note the amendments made to DLP16, this item should be kept under review as the project progresses and further work will be necessary in the future to understand whether the provision of culverts to maintain floodplain connectivity would be required.

Section 4.1.7 – Comment by the applicant is noted. Further discussion and detail on how the works would move forward would form part of the Flood Risk Activity Permit process in due course.

#### **Draft Development Consent Order - Version 9.0 July 2024**

Schedule 1 Work No. 4 – we note and welcome the addition of the reference to flood conveyance syphons under parts (f) and (g).

Schedule 1 Work No.18 – we note and welcome the addition of the reference to flood conveyance syphons under part (c).

#### **Appendix 5.3.2: Code of Construction Practice Version 4 July 2024 and Code of Construction Practice Annex 1 Water Management Plan April 2024**

We welcome the need for Flood Risk Activity Permits for a range of proposed works in, over or under main rivers, or for works within 8m of the channel or on the floodplain has been recognised by the applicant within the Code of Construction Practice (CoCP) and associated CoCP Annex 1 Water Management Plan.

Section 5.4.11 of the CoCP states the aim for the construction of the River Mole fish pass to take place when flows in the river are low, with the suggested timeframe of July to October. We are generally supportive of this approach as this should reduce the associated flood risk, though the applicant should also consider any restriction of working windows associated with fish spawning seasons. We appreciate further

details would be shared and the timing of the works agreed as part of the Flood Risk Activity Permitting process.

Section 5.6.10 of the CoCP discusses works which would involve river realignment, with this also flagged in section 10.7.6 of the CoCP Annex 1. The applicant recognises there should be no increase in flood risk throughout construction with the use of temporary mitigation to guard against this mentioned. The CoCP Annex 1 contains some further information in Section 10, including the delivery of the flood compensation elements prior to any encroachment into the floodplain. We are aware of the development of a Flood Delivery Compensation Plan which should also work alongside the CoCP and works sequencing, as well as the FRAP process.

Section 10.7.10 discusses the use of the 10% (1 in 10) AEP event as a starting point when considering the sizing of temporary watercourse crossing structure that would be present during the construction phase(s). We note and welcome the discussions with ourselves as part of the Flood Risk Activity Permit process to agree on the most appropriate AEP event to size each temporary structure against, as the 10% AEP event may not be suitable in every instance.

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

WE.2.4 The response states that the Wastewater Treatment Works could be installed if connection to Thames Water Utilities Ltd network cannot be accommodated. We would ask if the applicants could confirm if their preferred option is to remain connected to the network or to go with the new treatment works (operated by a NAV).

There is also no mention of the proposed reedbed system to handle de-icer run-off. It should be clarified within the documents whether the de-icer run-off is to be discharged to Thames Water assets or not.

We have referred to the Second Change Application Report. Section 2.2.2 states

- provision of on-airport facilities to treat de-icer contaminated surface water held by the existing long-term storage lagoons (comprised in Project Change 3 explained in the Change Application Report [AS-139]), which would remove the need to send these trade effluent flows from the airport to the Crawley STW, thus reducing the load on this facility

If this involves disconnection from the public foul sewer which has been accepted by Thames Water, they will need to formally state that they cannot take the trade effluent before we could find the proposal acceptable. Having a NAV operate the reed bed system may be acceptable or perhaps the more sewage from the site going to the Thames Water works would compensate for the removal of flows.

We would be keen to understand Thames Waters thoughts on the proposal that an increase in sewage waste could be accommodated by the removal of the trade component to the permissions the applicant already has in place, and we would require more information on the wastewater arrangement to comment further at this stage.

There is nothing, in principle, that would make any application for a permit unacceptable. Details would be finalised during the determination process would be a separate matter to the DCO.

If you require any further information, please do not hesitate to contact me.

Yours sincerely

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