



Thames Water Utilities Ltd.

Clearwater Court,
Vastern Road,
Reading,
RG1 8DB

19th December 2024

**Transport Infrastructure Planning Unit
Department for Transport**

Great Minster House,
33 Horseferry Road,
London,
SW1P 4DR

Response to Request for Comments from Thames Water Utilities Ltd. on the Proposed Gatwick Airport Northern Runway Scheme

Dear Transport Infrastructure Planning Unit,

At the current stage of the project, discussions between Thames Water Utilities Limited ("TWUL") and the Applicant regarding the capacity of TWUL's wastewater treatment works to accept flows are ongoing. To move the project forward, manhole, pumping station, flow and load surveys are required in the wastewater network, which needs to be funded by the Applicant. An agreement confirming this has been drafted and issued to the Applicant, but is not yet signed, although this is expected imminently. Funding will then need to be provided by the Applicant before the surveys can commence. These surveys and subsequent hydraulic modelling need to be completed before the impact on TWUL's wastewater treatment works can be fully understood.

As an agreed position has not been reached, TWUL have reviewed the proposed revised Requirement 31 and would request that the following amended wording be used – additional text is highlighted in red with any text to be removed struck through:

"Construction sequencing

31.—(1) The commencement of dual runway operations must not take place until Work No. 43 (water treatment works) has been completed.

(2) Work No. 39(b) (River Mole culverts and syphons) must not be commenced until Work No. 42(b) (weir and fish pass) has been completed.

(3) Prior to the commencement of the authorised development, the undertaker must prepare and provide to Thames Water Utilities Limited a development phasing plan which includes forecast passenger growth numbers for the period ~~up to the commencement of dual runway operations and ten years after the commencement of dual runway operations~~ from commencement of the authorised development up to and including the point at which dual runway operations have reached full passenger capacity ('the relevant period'). Such a



phasing plan must include detailed forecasts of the wastewater discharge rates and expected connection points for the authorised development throughout the relevant period. This should be based on the hydraulic modelling results validated by Thames Water Utilities Limited and must be submitted to and approved by Thames Water Utilities Limited in writing.

(4) The details in the plan provided pursuant to sub-paragraph (3) must not materially exceed the forecast annual passenger numbers shown for the equivalent time periods for the airport with the authorised development in Table 9.2-1 of the forecast data book.

(5) The commencement of Work No 44 (wastewater treatment works) must not take place until and unless Thames Water Utilities Limited confirm in writing ~~within two years of the making of this Order following review of the development phasing plan its infrastructure will not be able to accommodate the additional foul water flows for the ten-year period after the commencement of dual runway operations.~~ that the submitted development phasing plan is not approved due to the inability of its infrastructure to accommodate the change in wastewater flows proposed by the authorised development during the relevant period.

(6) ~~The commencement of dual runway operations must not take place~~In the event that Thames Water does provide the confirmation in sub-paragraph (5) that the change in wastewater flows cannot be accommodated, additional flows cannot be discharged by the authorised development until—

(a) Work No. 44 (wastewater treatment works) has been completed; and

(b) an application has been submitted for an environmental permit under regulation 12(1)(b) (requirement for an environmental permit) of the Environmental Permitting (England and Wales) Regulations 2016 for the operation of Work No. 44 (wastewater treatment works),

unless otherwise agreed in writing by Thames Water Utilities Limited

(7) In the event that Thames Water approves the development phasing plan and does not provide the confirmation in sub-paragraph (5), no change in wastewater flows is to take place other than in accordance with the approved development phasing plan unless otherwise agreed in writing with Thames Water Utilities Limited.”

Our reasoning for the updated wording is the following:

- In respect of Requirement 31(3), TWUL needs to understand the expected discharge rates which will arise from the growth in passenger numbers due to the authorised development until it reaches full capacity, which may take longer (or less) than 10 years to achieve. As such, the Requirement should refer to the period between commencement of the authorised development and the dual runway operations reaching full capacity to ensure TWUL has the information it requires to decide whether the change in flows can be accommodated. TWUL has also amended the requirements for the development phasing plan to ensure this includes the details it needs to understand the impacts of the development.
- In respect of Requirement 31(5), TWUL has amended the wording of this to accord with its processes. Once it receives the development phasing plan, TWUL will review it and notify the Applicant as to whether it is approved. If the plan is not approved because its network cannot accommodate the forecast flows, TWUL will then provide confirmation of this to the applicant. The modelling required as part of this process is likely to take at least 12 months to complete and will depend on whether the Applicant engages properly in the process. TWUL has therefore requested the removal of the two-year timeframe as it cannot be in a position where the Applicant delays providing the necessary details and TWUL is then forced to accommodate flows in its network because the two-year period has elapsed.



- As above, TWUL has amended Requirement 31(6) to better reflect how TWUL's processes will work in respect of the approval of the development phasing plan.
- In respect of Requirement 31(6)(b), TWUL notes that the drafting does not provide for a situation where the Environment Agency do not grant an environmental permit, but notes that this is a matter for the Environment Agency and therefore does not comment further on this.
- TWUL has requested the addition of Requirement 31(7) to provide for a situation where flows can be accommodated in its network subject to the Applicant being required to comply with the approved phasing plan.

Yours faithfully,
Thames Water Utilities Limited