



YOUR LONDON AIRPORT
Gatwick

Our northern runway: making best use of Gatwick

Preliminary Environmental Information Report

Appendix 11.3.1: Summary of Stakeholder Scoping Responses - Water Environment

September 2021

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1 Introduction

1.1 General

1.1.1 This document forms Appendix 11.3.1 of the Preliminary Environmental Information Report (PEIR) prepared on behalf of Gatwick Airport Limited (GAL). The PEIR presents the preliminary findings of the Environmental Impact Assessment (EIA) process for the proposal to make best use of Gatwick Airport's existing runways (referred to within this report as 'the Project'). The Project proposes alterations to the existing northern runway which, together with the lifting of the current restrictions on its use, would enable dual runway operations. The Project includes the development of a range of infrastructure and facilities which, with the alterations to the northern runway, would enable the airport passenger and aircraft operations to increase. Further details regarding the components of the Project can be found in the Chapter 5: Project Description.

1.1.2 This document provides the summary of stakeholder responses for the water environment for the Project.

Consultee	Details	How/where addressed in PEIR
Crawley Borough Council (CBC)	The Environmental Statement (ES) should be clear on the clear synergies between drainage and ecology impacts	See paragraph 11.1.2 (Chapter 11 of the PEIR)
Crawley Borough Council	Paras 7.5.17 /18 in the Environmental Impact Assessment Scoping Report (EIASR) suggest that there is existing under capacity in pollution storage lagoons and the pumping system	See Planning Inspectorate (PINS) comment 4.5.2, responded to in Table 11.3.1 (Chapter 11 of the PEIR)
Crawley Borough Council	CBC would welcome engagement with GAL to agree appropriate modelling scenarios to address climate change	The potential impacts of climate change have been taken into account within the Flood Risk Assessment (Appendix 11.9.1 of the PEIR). The latest Environment Agency guidance on climate change has been adopted for this assessment. This guidance is based on UKCP09. If the guidance is updated for UKCP18 then the impact of this on the Project will be considered at that time.
Crawley Borough Council	In para 7.5.25 there appears to be an error in the water quality baseline data as the 2017 target has been passed?	Surface water bodies generally have a deadline of up to 2021. Where it is deemed that the water body cannot achieve that, particularly if some of the status elements are at 'Bad', then the deadline shifts to 2027.
Crawley Borough Council	Are the drainage patterns described in para 7.5.45 [of the scoping report] correct?	The description is correct
Crawley Borough Council	The surface water drainage strategy should be based on sustainable principles (SuDS) except where it can be proven that this cannot be achieved because of airport safety considerations	The outline drainage strategy is summarised in the Flood Risk Assessment (Appendix 11.9.1 of the PEIR)
Crawley Borough Council	CBC would also wish to ensure that any drainage strategy for the Project can demonstrate through the ES that there is no likelihood of increased flooding occurring upstream (south) of Gatwick	The potential increase in flows due to changes in hardstanding/impermeable areas is considered in the Flood Risk Assessment (Appendix 11.9.1 of the PEIR). An assessment of the impact on water quality is provided in Section 11.9 (Chapter 11 of the PEIR).
Crawley Borough Council	It is essential to understand how pluvial and fluvial flows will be managed during the construction phase of the development	Construction phase flood risk is considered within the Flood Risk Assessment (Appendix 11.9.1 of the PEIR) and in Section 11.9 (Chapter 11 of the PEIR).
Crawley Borough Council	The ES should highlight and needs to carefully consider the environmental impacts of increased flows on watercourses especially the increase in sediment loading to surface water and water quality /pollutants as a result in of the significant increase in impermeable area	The potential increase in flows due to an increase in hardstanding/impermeable areas is considered in the Flood Risk Assessment (Appendix 11.9.1 of the PEIR). An assessment of the impact on water quality is given in Section 11.9 (Chapter 11 of the PEIR).
Crawley Borough Council	CBC consider that there could be an increase in sediment loading and pollutant deposition due to increase in aircraft and ground vehicle operation. This should be assessed in the ES.	The potential increase in flows due to an increase in hardstanding/impermeable areas is considered in the Flood Risk Assessment (Appendix 11.9.1 of the PEIR). An assessment of the impact on water quality is given in Section 11.9 (Chapter 11 of the PEIR).

Consultee	Details	How/where addressed in PEIR
Crawley Borough Council	The approach taken to water supply in respect of mitigation, enhancement and monitoring paragraph 7.5.87 is not considered robust	In the 'Gatwick Sub-region' Joint Water Cycle Study (2010), Sutton and East Surrey Water (SESW) expressed concerns about the 'over-abstraction' of catchments and a deficit to meet peak water supply demands during dry years. However, at a meeting with Gatwick on 3/10/19 SESW stated that this would be unlikely as a result of the proposed works at the airport.
Environment Agency	Reference is also made to the possible extension of the existing culvert that carries the River Mole/Crawters Brook beneath the runway, this is an aspect of particular interest as further information to demonstrate that flood risk will not be increased will be necessary	The existing culvert and syphon that convey the River Mole beneath the airport runways will need to be extended to accommodate the new Northern Runway. However it is considered that the realignment (including renaturalisation) of the River Mole slightly further downstream from the culvert will offset the culvert extension.
Environment Agency	The FRA should incorporate the latest guidance on climate change, this aspect is referenced as part of section 7.5.15. The Flood Risk Assessment (FRA) should clearly demonstrate how the risk to flooding from both fluvial and surface water will not be increased as a result of any development on the site	The potential impacts of climate change have been taken into account within the Flood Risk Assessment. The latest Environment Agency guidance on climate change has been used for this assessment, which is based on UKCP09. If the guidance is updated for UKCP18 then the impact of this on the Project will be considered at that time.
Environment Agency	It would be prudent to understand how the flood storage area owned and operated by GAL situated on the Gatwick Stream close to Crawley Sewage Treatment Works is viewed in relation to the risk to flooding from reservoirs	Flood risk from reservoirs is addressed in the Flood Risk Assessment (Appendix 11.9.1 of the PEIR). Gatwick are currently undertaking a study to investigate the risk of failure from this feature that will inform the ES.
Environment Agency	We would like to see stronger links and references made between the sections on ecology and water environment	See paragraph 11.1.2 (Chapter 11 of the PEIR).
Forestry Commission	It is essential that the ancient woodland identified is considered appropriately to avoid changes to the water table affecting ancient woodland	Potential changes to the water table are addressed in Tables 11.8.1 and 11.8.2 (Chapter 11 of the PEIR).
Mid Sussex District Council	Flood risk from sewers should be reviewed in more detail and reported in the ES	Flood risk from sewers is addressed in the Flood Risk Assessment (Appendix 11.9.1 of the PEIR). The assessment of flood risk from sewers has been informed by the development of a surface water drainage and a wastewater hydraulic model.
Mid Sussex District Council	A review of existing on-site ground investigations should be included in the ES	Land quality issues are addressed in Chapter 10 of the PEIR.
Mid Sussex District Council	The assessment should consider the effect of sediment from construction on surface water drainage in terms of blockage and reduced capacity.	Mitigation measures are set out in Section 11.8 (Chapter 11 of the PEIR).
Mole Valley District Council	Following review of the 2000 Local Plan in 2007. Policies ENV64 and ENV66 were not saved and are therefore not applicable.	Noted and reference is made to Local Planning Policies relevant to the Water Environment in Table 11.2.3 (Chapter 11 of the PEIR).
Mole Valley District Council	The suggested under-capacity in the pumping system and pollution storage lagoons in times of heavy rainfall must be addressed	The potential increase in flows due to an increase in hardstanding/impermeable areas is considered in the Flood Risk Assessment (Appendix 11.9.1 of the PEIR). An assessment of the impact on water quality is given in Section 11.9 (Chapter 11 of the PEIR).
Mole Valley District Council	The cumulative effects on water supply from the Proposed Development and other known development in the area are considered through the EIA	Cumulative effects are considered and presented within Chapter 19 of the PEIR.
Reigate and Banstead Borough Council	We question whether there is enough evidence/ justification at this stage to screen out changes in water quality at European designated sites	This is addressed in the Water Framework Directive (WFD) assessment included as Appendix 11.9.2 of the PEIR.
Reigate and Banstead Borough Council	We would however welcome additional clarity as to whether consideration of potential for increased run-off during the operational phase is proposed to be assessed as part of potential contamination impacts	The potential increase in flows due to an increase in hardstanding/impermeable areas is considered in the Flood Risk Assessment in Appendix 11.9.1 of the PEIR. An assessment of the impact on water quality is given in Section 11.9 and 11.11 (Chapter 11 of the PEIR)
Reigate and Banstead Borough Council	References to saved Borough Local Plan policies Ut4 "Flooding" and Ut3 "Foul and Surface Water" should be removed	Noted and reference is made to Local Planning Policies relevant to the Water Environment in Table 11.2.3 (Chapter 11 of the PEIR).
Reigate and Banstead Borough Council	The Burstow Stream and Burstow Stream Tributary are incorrectly labelled as 'non-main river' when they are actually identified by the Environment Agency as main rivers	This figure has been updated as PEIR Figure 11.6.1.

Consultee	Details	How/where addressed in PEIR
Reigate and Banstead Borough Council	With regards to the proposed study area, the Council notes that Paragraph 7.5.72 [of the scoping report] states that “the study area will generally be defined by a 2km radius beyond the Project site boundary”. The Council considers that it is unclear what the justification is for the delineation of this study area	Additional information has been provided in this PEIR on the definition of the study area in paragraphs 11.4.5-11.4.10 (Chapter 11 of the PEIR).
Reigate and Banstead Borough Council	It is unclear from the information provided in the EIA as to whether this [Upper Mole] model has been prepared in consultation with the Environment Agency and whether it has the agreement of the Environment Agency with regards to its robustness/ methodology	The Upper Mole hydraulic model has been developed collaboratively by GAL and the Environment Agency. The additional modelling undertaken by GAL to assess the impact of the Project will be reviewed by the Environment Agency as part of their review of the Flood Risk Assessment. This approach is stated in the Flood Risk Assessment (Appendix 11.9.1 of the PEIR).
Reigate and Banstead Borough Council	We expect this evidence document [Reigate & Banstead SFRA] to be acknowledged and given due regard in the EIA	The sources of information pertinent to the Project and potential receptors are set out in the Flood Risk Assessment (Appendix 11.9.1 of the PEIR).
Reigate and Banstead Borough Council	Crawley Borough Council, Reigate & Banstead Borough Council and Mid Sussex District Council are in the process of undertaking a water cycle study, that could inform the ES	The Water Cycle Study dated August 2020 and January 2021 addendum have informed the PEIR assessment, see Table 11.3.1 (Chapter 11 of the PEIR).
West Sussex County Council	Reference should be made to the West Sussex LLFA Policy for the Management of Surface Water.	Refer to the Flood Risk Assessment (Appendix 11.9.1 of the PEIR).
West Sussex County Council	LLFAs do not hold data regarding unlicensed groundwater and surface water abstractions.	Noted

2 Glossary

2.1 Glossary of terms

Table 2.1.1: Glossary of Terms

Term	Description
CBC	Crawley Borough Council
EIA	Environmental Impact Assessment
EIASR	Environmental Impact Assessment Scoping Report
ES	Environmental Statement
FRA	Flood Risk Assessment
GAL	Gatwick Airport Limited
PEIR	Preliminary Environmental Information Report
PINS	Planning Inspectorate
SESW	Sutton and East Surrey Water
WFD	Water Framework Directive