

Jo Dowling  
 The Planning Inspectorate  
 National Infrastructure Planning  
 Temple Quay House (2 The Square)  
 Bristol  
 BS1 6PN

**Our ref:** NE/2023/135743/01-L02  
**Your ref:** TR020001  
**Date:** 22 June 2023

Dear Jo

**Application by Luton Rising for a Development Consent Order (DCO) under the Planning Act 2008 for proposed London Luton Airport expansion.**

PADSS table to accompany the Relevant Representations (RR)

Principal Areas of Disagreement Summary Statement (PADSS) from Environment Agency		Version Number: 01 Submitted at: 23 June 2023	
Principal Issue in Question	Concern Held	What needs to change/ be amended/ be included in order to satisfactorily address the concern	Likelihood of concern being addressed during Examination
Treated foul effluent and surface water runoff discharge to ground via infiltration.	<p>The current proposal is <u>reliant</u> on the discharge of treated surface water runoff and foul effluent to ground via two infiltration tanks located towards the southeast of the scheme.</p> <p>The discharge will be into the Chalk, a strategically important Principal Aquifer utilised for drinking water supply. The discharge is located within groundwater Source Protection Zone</p>	<p>The applicant must provide evidence that every opportunity to discharge foul and surface water runoff to the sewage treatment infrastructure operated by Thames Water has been exhausted. The discharge to ground should be considered only as a last option.</p> <p>The applicant must provide a comprehensive list of contaminants that will be present in the surface water runoff and foul water. The contaminants in surface water should be identified based on airport activities and areas that will discharge into the system. For foul water, reference to literature and engagement with wastewater companies can be considered to provide information regarding the likely composition of foul effluent arising from the airport.</p>	<p>This requires extensive work, to assess and demonstrate that the discharge of treated surface water and foul effluent to ground will not result in environmental pollution.</p> <p>We are of the opinion that the current proposal is not sufficiently developed and feel that it is unlikely that sufficient work can be completed within the time frame of the Examination to address our concerns.</p>

	<p>3 (SPZ3) for a drinking water supply borehole.</p> <p>This discharge could potentially result in the irreversible pollution of the groundwater unless the water is treated to a very high-quality standard.</p> <p>The discharge of treated foul effluent and surface water will require an Environmental Permit issued by the Environment Agency. Based on the limited information provided we cannot guarantee that a permit will be issued.</p>	<p>The applicant must complete a detailed quantitative risk assessment for all the identified contaminants to assess if the discharge would be acceptable and is feasible given available water treatment technologies. Background contaminant levels, cumulative effects, and the groundwater quality immediately beneath the site as a receptor must be considered.</p> <p>Provide a feasibility assessment, from a groundwater protection point of view, for the chosen location of the infiltration tanks.</p> <p>Drainage System: Provide evidence that the contaminants arising from the airport / new development will not bypass the proposed live monitoring system and will be effectively treated via passive treatments or oil water separator, where applicable.</p>	
--	---	---	--

We are happy to provide clarification of any of the points above if this is required, in which case please contact Matt Parr, Hertfordshire & North London Area Green Growth & Delivery Account Manager, Alchemy, Bessemer Road, Welwyn Garden City, AL7 1HE. Email [hnlgreengrowth@environment-agency.gov.uk](mailto:hnlgreengrowth@environment-agency.gov.uk)

We look forward to continuing to work with the applicant to resolve any outstanding matters and to ensure the best environmental outcome for this project.

Yours sincerely,

**Matt Parr**  
**Account Manager**