

**Planning Inspectorate submission – Expansion London Luton Airport**  
**Unique Reference: 20037881**

On the back of the recent publication from the Climate Change Committee (28/06/2023 Report), which clearly shows the United Kingdom should not be considering any airport expansion, I wish to point our two issues relating to the Planning Application for the Luton Airport Expansion.

**Issue 1**

The wild Bee Orchid (*Ophrys apifera*) is the County Flower of Bedfordshire and for those who live in the surrounding wards of Wigmore and Crawley (now Vauxhall) we are lucky enough to see examples of them in the Wigmore Valley Park County Wildlife Site, and elsewhere within Wigmore Valley Park. **The Wildlife Trust for Beds, Cambs and Northants.**

(Recorded sitings are made yearly to the Bedfordshire Natural History Society by Recorders Richard and Geraldine Hogg). The hundreds of Common Spotted Orchids, smaller numbers of Pyramidal, and Southern Marsh Orchids, Twayblades, and Hybrids appear yearly.

It is with dismay that I have followed the successive plans and consultations selling the notion that the Luton Borough Council are backing their airport company Luton Rising (aka London Luton Airport) in their plans to build onto the important County Wildlife Site in the Wigmore area of Luton. Despite Luton Rising’s promises of replicating the County Wildlife site elsewhere, it is not something that is possible. The planned replacement park is ex-agricultural wheat field land which has had the associated use of chemicals to enhance the farming crops.

The Luton Local Plan in relation to the orchid population LLP6 E Wigmore Park ii. This states that the “new open space” to replace Wigmore Valley Park offers facilities of at least EQUAL quality and that this is available and accessible before any development takes place on the existing Wigmore Valley Park. I do fail to see how a quality match of the orchids can be achieved with success, given the specific fungal soil required.

With reference to **LLA DCO Vol 5 Environmental Statement and Biodiversity, Table 8 8.12 page 59 Rev 1 April 2023**, a very short description of the Wigmore Park County Wildlife Site is mentioned, but failing to mention the five types of orchids on the site, yet other County Wildlife sites listed in Luton provide full details of species. Why is this? What, may I ask, is the purpose of underplaying the value of Wigmore Park and its wild flora?

As I mentioned above it is recorded by the Bedfordshire Natural History Society (BNHS) records that Wigmore Valley Park has not only Bee Orchids, but in addition has Pyramidal Orchids, Common Spotted Orchids, Southern Marsh Orchids, Twayblades and hybrids. A copy of the publication "*The Wild Orchids of Wigmore Park, Luton*" by Richard and Geraldine Hogg 2018, I will forward to the Planning Inspectorate for your information.

It is disappointing to see that on page 18 of the above Environmental Statement the recordings of Bee Orchids listed are from 2010-2016, when every year Richard and Geraldine Hogg, local residents who are recognised Natural History Recorders, ensure that all sightings are with the BNHS records, up until this summer 2023. (Richard and Geraldine Hogg are acknowledged in "*Wild Orchids of Bedfordshire*" Revel, Boon, Bellamy 2015 and in the tome "*Flora of Bedfordshire*" Boon and Outen 2011). Consequently, Wigmore Valley Park have the advantage of orchid experts on living in the Wigmore area, on our doorstep.

It is doubly disappointing to read on page 10 of the Environmental Statement 3.3.4 that the Phase 1 habitat surveys were undertaken "outside" the flowering period for 2018 and then the results for 2010-2016 were published. At that time Southern Marsh orchids had not been recorded in Wigmore Valley Park hence they were omitted from the document.

With reference to the Mitigation Strategy 4.1.1, page 15, which addresses safeguarding of the orchid and then followed by 4.1.2 which states that a translocation exercise would take place. A few years back, summer 2019, when a drilling project took place in the park to explore methane/explosive matter formation under the park surface, a translocation of orchids took place and the Luton Borough Council (LBC) assured the community this would be a success. However the Guidelines for Translocation, *Guidelines for Civil Engineers Translocation of Orchids* were not adhered to. These guidelines detail the acknowledged process for the translocation exercise.

### **Guidelines**

Firstly, matching the receptor site to the donor site – this was not done.

[What happened: donor site chalky and low grass, receptor site heavy clay type soil with high weeds, so unlikely to have the required biozyme/fungi to feed orchids.](#)

Secondly, removing orchid turfs with 1m x 0.5m x 0.33m depth and replant in well watered ground.

[What happened: small area approx 10cm sq planted in dry ground.](#)

Thirdly, replanting end to end with no gaps. – this was not done.

[What happened: turfs with orchids planted randomly in a weed filled meadow, gaps in the orchid turfs, enabled damage to the fragile root system.](#)

Fourthly, translocate at the right time of year, not summer – this was not done.

[What happened: In the height of a summer heat wave.](#)

Fifthly, immediate watering – this was not done

[What happened: there was no access to water in a heatwave. They were all watered twelve days later.](#)

**THE RESULT: not one of the orchids survived.**

The survival of orchids as a key British Wild Flower do require specific conditions. It is well documented that wild orchids do require a specific mycotrophic fungal environment to exist. Consequently adherence to recognised guidelines are essential for their survival.

*Pocket Guide to the Orchids of Britain and Ireland* Simon Harrap, Bloomsbury 2016

With reference to the **Natural Environment and Rural Communities Act 2006, Section 40** Councils have a duty to conserve biodiversity. As exemplified in the recent **Betteshanger Park v. Dover** whereby there was a plan to construct a hotel on a park known for its **Lizard Orchids**. The plans were turned down as “any proposed development could potentially damage the wildlife value of the park which should remain key in planning consideration for Councils”

**The Environmental Act Biodiversity Net Gain Act 2021** aims to create balance between urban development and nature conservation, however, the effectiveness of this act has been questioned due to the potentially flawed baseline conditions. **The Wenny Road Meadow**, a large green space under threat of housing development has found that assessments failed to include the considerable invertebrate population which included numerous species. This has led to disputes between the Wildlife Trust and the developer’s ecologist’s assessment and highlights issues which can skew results widely.

It is clear that, along with the orchids, a vast invertebrate population would be wiped out with this planned airport expansion and the “replacement park” in the plans has always been publicly accessible land so doesn’t really fit the role of NEW green space for the residents of Wigmore, Crawley (Vauxhall) and the surrounding areas.

PLEASE NOTE

**Redacted** parts of **TRO200/01APP/5.02 I Rev 1 I April 2023** do make some of the document difficult to fully understand.

## Issue 2

I have great concerns regarding the disturbance of the historical landfill site as it has been shown that such disturbance can have serious ecological and health impacts.

Before Wigmore Valley Park developed into the tree filled mature park and County Wildlife Site it is today it was an unregulated landfill tip between the years 1937 and 1978. Following the tip closure it was clay covered and parkland was created with the purpose of providing a **buffer** between the airport and local housing when Luton was managed by Bedford County Council (prior to Luton becoming a Unitary Council). The protective purpose of a **buffer** now appears to have been forgotten by the Luton Council, Luton Rising, and their developers but not by the residents who live close by, who are blighted by noise, smells, and pollution.

During World War II, both ammunition waste from locally manufactured wartime devices from Davis Gas Stove Company, who manufactured shells, mortar bombs, land mines, grenades, and from the Laporte Chemical factory, used this unregulated landfill to dispose of their waste as a consequence this type of waste is known to cause landfill leachate which causes ecotoxicity and environmental change. Unexploded bombs, heavy metal ions, chlorinated aliphatics, and pesticides are generally toxic and a potential threat to the surrounding environment as it has been shown that dissolved organic matter can change heavy metal stability, and hence **disturbance** can lead to health and safety hazards.

In addition to waste disposal in the landfill, RAF Luton was located on the southern section of the site and research has shown 28 bombs fell within the airfield area during WWII – record keeping was not clear. It has been recorded that the most likely threat is from AXO/LSA/SAA ranging from small IBs through to large HE bombs which would be the main threat, a primary German bombing target. 2 x 15” shells were collected from Luton Airport in March 1986.

**REF: 6 Alpha project Number P6329, Landmark order No 150051476\_1 Envirocheck**

**Structural Soils Borehole Log for London Luton Airport contract ref 562415,  
19.12.2016 – Borehole LF-BH10G abandoned at 1.80m as evidence of Unexploded  
Ordinance.**

Government reference to closed landfill, updated 29 June 2023, refers to the **Environment Agency** and thereby to compliance with **Waste Framework Directive Article 13. Directive 2008/98/EC chapter II art 13** and states: **Protection of Health and the Environment must ensure the management is carried out without harming the environment.**

- a. Without risk to water, air, soil, plants, or animals
- b. Without causing a nuisance through noise or odours
- c. **Without adversely affecting the countryside or place of specialist interest**

The chalk aquifer beneath the landfill site has been shown to be sensitive with a previous incidence of groundwater contamination in bordering Hertfordshire.

**REF: Water Research Vol 203 15.9.2021 117525.**

**Structural Soils Borehole Log for London Luton Airport contract ref 562415, 19.12.2016 – Borehole LF-BH10G abandoned at 1.80m as evidence of Unexploded Ordinance.**

A methane blast from a landfill in Derbyshire damaged a house and injured residents – the clay covered landfill in Wigmore Valley Park is only a few metres away from housing.

**REF: Britain's Toxic Secret PANORAMA BBC 2023**

Luton Borough Council had already been warned that there are dangers of underground explosions and fires which are impossible to put out. This is a particular concern where there are earthworks. Airports are a Safeguarded Civil Aerodrome under **The Town and Country Planning Direction 2002** which applies to military explosive storage areas in addition to aerodromes and technical sites. Luton Airport is sited in Annex 3 as an "Officially Safeguarded Civil Aerodrome".

**J:/245000/245580-00/4 INTERNAL PROJECT DATA/4-05 REPORTS/2017-06-06 CENTURY PARK PRA/2017-06-15 PRA\_ISSUE.DOCX page 11, Issue 15 June 2017**

**REF: DfT/ODPM circular 1/2003** – advice to local planning authorities on safeguarding aerodromes and military explosive storage areas issued by the Department of Transport 4.11.2005.

In conclusion, the Conservative Government stated on 24<sup>th</sup> July 2023 that they didn't believe in concreting over the countryside. Wigmore Valley Park is vital as part of urban Luton's rare and ever decreasing countryside which twice in recent years has been voted as "Best Loved Park/Local Favourite Park" in Bedfordshire by Fields in Trust – the destruction of its wildlife, trees, flora and fauna in the face of a global climate emergency is inconceivable. Particularly after the recent United Nations pronouncement.

**REF: Era of Global Boiling - António Guterres, UN Secretary General 27<sup>th</sup> July, 2023**

