

From: [Matthew Hubbart](#)
To: [Luton Airport](#)
Cc: [Jeffrey Okaj](#)
Subject: London Luton Airport Expansion DCO Queries
Date: 23 August 2023 17:43:53
Attachments: [image001.png](#)

Hi Rammiel,

Thank you for our call earlier today, which was most helpful.

Following our conversation, I would be grateful if you could clarify whether the 1,500 word summary of our Relevant Representation is essential as noted in the Rule 8 letter. This would be useful for our work on future DCOs.

In addition, the follow is our summary of our Relevant Representation, which we hope will be of use by the Planning Inspectorate:

“Thames Water Utilities Limited (“TWUL”) is appointed under Chapter 1 of Part II of the Water Industry Act 1991 (“WIA”) as water and sewerage undertaker for the Thames region, which includes sewerage only at the location of the London Luton Airport Expansion DCO.

In principle, TWUL does not object to the London Luton Airport scheme but has concerns relating to the increase in sewage discharge as a result of the expansion, both during and beyond the development. TWUL requires assurances that this can be delivered and managed without having a detrimental impact to TWUL’s existing customers and assets. TWUL will need to work closely with London Luton Airport (the “Applicant”) to alleviate these concerns.

TWUL owns land, sewers and other apparatus throughout and surrounding the DCO boundary that will be affected by the scheme, which will either need to be protected or diverted as a result.

TWUL does not believe that the provisions of the draft Development Consent Order (“the Order”) satisfactorily protect TWUL’s existing and future apparatus and ability to comply with its statutory duties or exercise its statutory powers. Please find

TWUL’s objections (all clauses below are objected to), proposed amendments to specific provisions and additions to the protective provisions in order to alleviate the concerns below.

General Objections:

- a. **Asset Protection Review:** This DCO affects TWUL sewerage assets. We would require an asset protection review prior to any works within 5 meters of our assets. This would ultimately lead to either a letter of no further comment being issued, or the affected assets being diverted.
- b. **Foul Water Discharge:** TWUL needs to be provided with Luton’s modelled foul water flows and needs to understand the impact of the change in these (as a result of the development) on our network. This information should be provided a minimum of 36 months before flows come in to allow for any necessary upgrades in our network. TWUL will also need to understand how wastewater from aircraft will be managed as a result of the development, with emphasis on its chemical composition, average periodic volumes

and points of discharge into TWUL's network.

- c. **Surface Water Discharge:** TWUL needs assurance that any surface water discharge as a result of the development will not be contaminated and will adhere to the London Plan and associated discharge hierarchy. If there is any proposed increase in surface water runoff TWUL will need to know this in advance (with the same timescales as for the foul flows).
- d. **Trade Effluent Discharge:** There are particular concerns as to how glycol contaminated surface water will be managed. Prior to the development, TWUL will need the trade effluent (including the discharge of glycol contaminated surface water) monitored to understand the impact the development will have on TWUL's network. Once this monitoring is established TWUL will then need to understand the proposed increase or changes to the trade effluent discharge."

Best regards,

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