

**From:** Collins, Alison [REDACTED]  
**Sent:** 28 November 2023 11:59  
**To:** Luton Airport <Lutonairport@planninginspectorate.gov.uk>  
**Cc:** Bishop, Robert [REDACTED] Melvin, Jamie  
[REDACTED]

**Subject:** TR020001 London Luton Airport Expansion: Issue Specific Hearing 8 Natural England 20039412

Dear Jo Dowling

With regard to Issue Specific Hearing 8 on 29th November 2023 which will be concerned with various aspects including Land-use and use of best and most versatile land (BMV) , Natural England has an update regarding soils and BMV land.

For your reference, I have attached the Soil Resources spreadsheet which was recently provided to us by the Applicant. Our soil specialist has considered the information and is now satisfied that this addresses our comments regarding a soil balance breakdown phase by phase. However, there is still the outstanding comment from our Relevant Representation (2.11) that 'The Soil Management Plan (SMP) needs to be clearer that the aim is for BMV agricultural land subject to temporary development or a change in land use, to be returned to, or retain, its original land quality'. We now look for this to be addressed in the detailed SMP that is to be submitted post consent.

We will be happy to respond in writing to any further questions that may arise from the Hearing.

Yours sincerely


Alison

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Table 1: Phase 1 - Soil Resources on the Main Site

Soil Type	Phase 1			
	Topsoil Retained for Landscape Purposes (m <sup>3</sup> )	Subsoil Retained for Landscape Purposes (m <sup>3</sup> )	Topsoil from Urban Soils Outside Landfill Area Retained for Landscape Purposes (m <sup>3</sup> )	Subsoil from Agricultural and Non-agricultural Land NOT Retained for Landscape Purposes (m <sup>3</sup> )
High Sensitivity (Heavy Clay Loam and Clay)	11025	11025	22275	22275
Medium Sensitivity (Medium Clay Loam)	1225	1225	2475	2475
Low Sensitivity (Sandy Loam)	0	0	0	0
<b>Total</b>	<b>12250</b>	<b>12250</b>	<b>24750</b>	<b>24750</b>

Note: Soils in Landfill Area NOT reused for Landscaping Purposes

Table 2: Phase 2A - Soil Resources on the Main Site

Soil Type	Phase 2A					
	Topsoil Retained from Former Agricultural Land for Landscape Purposes (m <sup>3</sup> )	Subsoil Retained from Former Agricultural Land for Landscape Purposes (m <sup>3</sup> )	Surplus Topsoil NOT Retained for Landscape Purposes (m <sup>3</sup> ), i.e., from former agricultural land	Surplus Subsoil NOT Retained for Landscape Purposes (m <sup>3</sup> ), i.e., from former agricultural land	Topsoil NOT Retained for Landscape Purposes (m <sup>3</sup> ), i.e., from urban areas outside the landfill	Subsoil NOT Retained for Landscape Purposes (m <sup>3</sup> ), i.e., from urban areas outside the landfill
High Sensitivity (Heavy Clay Loam and Clay)	24800	46640	63200	41360	21400	21400
Medium Sensitivity (Medium Clay Loam)	6200	11660	15800	10340	5350	5350
Low Sensitivity (Sandy Loam)	0	0	0	0	0	0
<b>Total</b>	<b>31000</b>	<b>58300</b>	<b>79000</b>	<b>51700</b>	<b>26750</b>	<b>26750</b>

Table 3: Phase 2B - Soil Resources on the Main Site

Soil Type	Phase 2B			
	Topsoil Retained for Restoring 0.6ha to West of J10 of M1 (m <sup>3</sup> )	Subsoil Retained for Restoring 0.6ha to West of J10 of M1 (m <sup>3</sup> )	Topsoil from Agricultural and Non-agricultural Land NOT Retained for Landscape Purposes (m <sup>3</sup> )	Subsoil from Agricultural and Non-agricultural Land NOT Retained for Landscape Purposes (m <sup>3</sup> )
High Sensitivity (Heavy Clay Loam and Clay)	1200	1200	12800	12800
Medium Sensitivity (Medium Clay Loam)	300	300	3200	3200
Low Sensitivity (Sandy Loam)	0	0	0	0
<b>Total</b>	<b>1500</b>	<b>1500</b>	<b>16000</b>	<b>16000</b>

Table 4: Cumulative Volumes of Soil Resources on the Main Site at the End of Phase 2B

Soil Type	Phase 1, Phase 2A, and Phase 2B			
	Topsoil Retained for Landscape Purposes (m <sup>3</sup> )	Subsoil Retained for Landscape Purposes (m <sup>3</sup> )	Topsoil from Agricultural and Non-agricultural Land including Landfill Area NOT Retained for Landscape Purposes (m <sup>3</sup> )	Subsoil from Agricultural and Non-agricultural Land including Landfill Area NOT Retained for Landscape Purposes (m <sup>3</sup> )
High Sensitivity (Heavy Clay Loam and Clay)	35800	57400	117200	95360
Medium Sensitivity (Medium Clay Loam)	8950	14350	29300	23840
Low Sensitivity (Sandy Loam)	0	0	0	0
<b>Total</b>	<b>44750</b>	<b>71750</b>	<b>146500</b>	<b>119200</b>

**C1003**

**Luton Airport DCO - Post Application Matters - Agricultural Land Quality**

Key Notes:

The zone of influence for the assessment of agricultural land quality and farm holdings is the same as the agricultural Study Area, i.e. agricultural land required for constructing the Main Application Site; agricultural field margins required for landscape mitigation planting, as shown on **Figure 14.10** of this ES [TR020001/APP/5.03]; and agricultural land required to construct Off-site Highway Interventions to the west of junction 10 of the M1 and immediately to the north of Half Moon Lane.

The quality of approximately 120ha of agricultural land within the Main Application Site has been determined by detailed ALC surveys as follows:

a) Ministry of Agriculture, Fisheries and Food (MAFF) detailed (Post 1988) Agricultural Land Classification at Winchhill Farm, Off Darley Road, Darley Hall, Hertfordshire (MAFF Refs: 020/94 and 045/95), a copy of which is provided as Appendix 6.1 of this ES [TR020001/APP/5.02]

b) A detailed (Post 1988) ALC of approximately 18.9ha of land at Wandon End, Hertfordshire, carried out on 21st June 2018, provided as Appendix 6.2 of this ES [TR020001/APP/5.02]

**Table 1: Agricultural Land Classification (i.e., 120 Ha of Agricultural Land in Main Site)**

ALC Grade	TOHA ALC Survey at Wandon End (Ha)	MAFF Post 1988 ALC Survey (045/95) (Ha)	Total Area of Agricultural Land within Main Application Site (Ha)	% of Main Application Site
Grade 1 (Excellent) - High Sensitivity	0	0	0	0
Grade 2 (Very Good) - High Sensitivity	0	0	0	0
Subgrade 3a (Good) - High Sensitivity	15.5	42.1	57.6	12
<b>Total BMV, i.e. ALC Grade 1, 2 and Subgrade 3a - High Sensitivity</b>	<b>15.5</b>	<b>42.1</b>	<b>57.6</b>	<b>12</b>
Subgrade 3b (Moderate) – Medium Sensitivity	3.4	59	62.4	13
Grade 4 (Poor) – Low Sensitivity	0	0	0	0
Grade 5 (Very Poor) – Low Sensitivity	0	0	0	0
<b>Total Agricultural Land</b>	<b>18.9</b>	<b>101.1</b>	<b>120</b>	<b>25</b>

**Table 2: Phase 1 - Agricultural Land in Main Site**

ALC Grade	Phase 1			
	Agricultural Land to be Retained in Arable Production (Ha)	Former Agricultural Land (including Former Arable Land) used for Neutral Grassland (Ha) (Potentially Reversible)	Temporarily Required for Development (Ha)	Permanently Required for Development(Ha)
Grade 1 (Excellent) - High Sensitivity	0.0	0.0	0.0	0.0
Grade 2 (Very Good) - High Sensitivity	0.0	0.0	0.0	0.0
Subgrade 3a (Good) - High Sensitivity	15.0	27.0	8.1	7.5
<b>Total BMV, i.e. ALC Grade 1, 2 and Subgrade 3a - High Sensitivity</b>	<b>15.0</b>	<b>27.0</b>	<b>8.1</b>	<b>7.5</b>
Subgrade 3b (Moderate) – Medium Sensitivity	27.4	32.4	0.0	2.6
Grade 4 (Poor) – Low Sensitivity	0.0	0.0	0.0	0.0
Grade 5 (Very Poor) – Low Sensitivity	0.0	0.0	0.0	0.0
<b>Total Agricultural Land</b>	<b>42.4</b>	<b>59.4</b>	<b>8.1</b>	<b>10.1</b>

**Table 3: Phase 2A - Agricultural Land in Main Site**

ALC Grade	Phase 2a			
	Agricultural Land to be Retained in Arable Production (Ha)	Former Agricultural Land (including Former Arable Land) used for Neutral Grassland (Ha) (Potentially Reversible)	Temporarily Required for Development (Ha)	Permanently Required for Development(Ha)

Grade 1 (Excellent) - High Sensitivity	0.0	0.0	0.0	0.0
Grade 2 (Very Good) - High Sensitivity	0.0	0.0	0.0	0.0
Subgrade 3a (Good) - High Sensitivity	0.0	1.5	0.6	17.6
<b>Total BMV, i.e. ALC Grade 1, 2 and Subgrade 3a - High Sensitivity</b>	<b>0.0</b>	<b>1.5</b>	<b>0.6</b>	<b>17.6</b>
Subgrade 3b (Moderate) – Medium Sensitivity	0.0	10.5	0.0	26.4
Grade 4 (Poor) – Low Sensitivity	0.0	0.0	0.0	0.0
Grade 5 (Very Poor) – Low Sensitivity	0.0	0.0	0.0	0.0
<b>Total Agricultural Land</b>	<b>0.0</b>	<b>12.0</b>	<b>0.6</b>	<b>44.0</b>

**Table 4: Phase 2B - Agricultural Land in Main Site**

ALC Grade	Phase 2b			
	Agricultural Land to be Retained in Arable Production (Ha)	Former Agricultural Land (including Former Arable Land) used for Neutral Grassland (Ha) (Potentially Reversible)	Temporarily Required for Development (Ha)	Permanently Required for Development(Ha)
Grade 1 (Excellent) - High Sensitivity	0	Unchanged from Phase 2A	Unchanged from Phase 2A	Unchanged from Phase 2A
Grade 2 (Very Good) - High Sensitivity	0	Unchanged from Phase 2A	Unchanged from Phase 2A	Unchanged from Phase 2A
Subgrade 3a (Good) - High Sensitivity	0	Unchanged from Phase 2A	Unchanged from Phase 2A	Unchanged from Phase 2A
<b>Total BMV, i.e. ALC Grade 1, 2 and Subgrade 3a - High Sensitivity</b>	<b>0</b>	<b>Unchanged from Phase 2A</b>	<b>Unchanged from Phase 2A</b>	<b>Unchanged from Phase 2A</b>
Subgrade 3b (Moderate) – Medium Sensitivity	0	Unchanged from Phase 2A	Unchanged from Phase 2A	Unchanged from Phase 2A
Grade 4 (Poor) – Low Sensitivity	0	Unchanged from Phase 2A	Unchanged from Phase 2A	Unchanged from Phase 2A
Grade 5 (Very Poor) – Low Sensitivity	0	Unchanged from Phase 2A	Unchanged from Phase 2A	Unchanged from Phase 2A
<b>Total Agricultural Land</b>	<b>0</b>	<b>Unchanged from Phase 2A</b>	<b>Unchanged from Phase 2A</b>	<b>Unchanged from Phase 2A</b>

**Table 5: Cumulative Area of Agricultural Land in Main Site in Phase 1, Phase 2, and Phase 2b**

ALC Grade	End of Phase 2b			
	Agricultural Land to be Retained in Arable Production (Ha)	Former Agricultural Land (including Former Arable Land) used for Neutral Grassland (Ha) and Additional Landscape Mitigation (Potentially Reversible)	Temporarily Required for Development (Ha)	Permanently Required for Development(Ha)
Grade 1 (Excellent) - High Sensitivity	0.0	0.0	0.0	0.0
Grade 2 (Very Good) - High Sensitivity	0.0	0.0	0.0	0.0
Subgrade 3a (Good) - High Sensitivity	0.0	32.5	0.0	25.1
<b>Total BMV, i.e. ALC Grade 1, 2 and Subgrade 3a - High Sensitivity</b>	<b>0.0</b>	<b>32.5</b>	<b>0.0</b>	<b>25.1</b>
Subgrade 3b (Moderate) – Medium Sensitivity	0.0	42.9	0.0	19.5
Grade 4 (Poor) – Low Sensitivity	0.0	0.0	0.0	0.0

Grade 5 (Very Poor) – Low Sensitivity	0.0	0.0	0.0	0.0
<b>Total Agricultural Land</b>	<b>0.0</b>	<b>75.4</b>	<b>0.0</b>	<b>44.6</b>