

The Planning Inspectorate  
Major Casework Directorate  
Temple Quay House (2 The Square)  
Temple Quay  
Bristol  
Avon  
BS1 6PN

**Our ref:** NE/2023/136256/03-L01

**Date:** 7 December 2023

Dear Sir/Madam

**Application by London Luton Airport Limited for the London Luton Airport Expansion Project: Action Points arising from Issue Specific Hearing 8 (ISH8) on environmental matters, health, and communities.**

**Luton Airport, 2 Percival Way, Luton, LU2 9LY**

**Action 32: Listen to agenda item 6, bullet point 2 and provide a written response, if needed, to any of the points discussed**

Discharge to ground

We are currently assessing the deadline 4 and 5 documents that have been submitted in support of the application and will provide detailed comments on these to the applicant through our ongoing engagement.

We support the preferred option including the discharge to Thames Water and have made progress with the applicant regarding the environmental controls required for the reserve option. We are now more confident that, with the inclusion of additional potential processes which have been identified by the applicant in the DDS and Design Principles, and requirement 12 in place, that the reserve option may be acceptable after further detailed design.

We support the applicant's commitment in the design principles for no harmful or hazardous substances to be discharged to ground, which gives us more confidence in the scheme.

Regarding future permit applications, we have made progress with the applicant and are more confident that a permit in future may be granted however, we are unable to pre-determine any permits as the necessary level of detail has not currently been submitted. This is a risk the applicant is aware of.

Works in and around the landfill

We have issued guidance regarding drilling through landfill for the applicant to consider and include in their strategy and documents. We are currently reviewing the deadline 4 and 5 submitted documents and will have comments for the applicant regarding these in

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due course. We still have some concerns regarding the works in and around the landfill, however, are working with the applicant to come to a solution.

We are currently named in the DCO under requirement 16 which will allow us to further comment on the Foundation Works Risk Assessment and the Remediation Strategy at the detailed design stage.

We look forward to receiving the Waste recovery plan and will work to progress this document in line with Statement of Common ground updates.

#### Attenuation and Storage tanks

Regarding the storage tanks still proposed within the landfill. We would have a high preference that all storage tanks are removed from the landfill area to reduce the high risk of tank failure and consequent discharge due to settlement within the landfill.

If the applicants move forwards with this aspect of the proposal, the design of the storage tanks will be critical to reduce this risk. We are currently reviewing the design principles and deadline 4 and 5 documents to determine if they address our concerns relating to this topic and will provide comments directly to the applicant.

#### Water Framework Directive compliance assessment

We agree with the applicant's response regarding this topic and were happy with the applicant's comments in response to our concerns. This has been captured within the statement of common ground for submission at deadline 6.

There are still some water resource related topics to come to agreement with however we are working with the applicants to come to a solution on these.

Yours faithfully

**George Lloyd**

**Planning Specialist, Green Growth and Delivery**