

December 2023

# London Luton Airport Expansion

Planning Inspectorate Scheme Ref: TR020001

Volume 8 Additional Submissions (Examination)

## **8.19 Statement of Common Ground between London Luton Airport Limited and the East of England Ambulance Service**

Infrastructure Planning (Examination Procedure) Rules 2010

Application Document Ref: TR020001/APP/8.19

**The Planning Act 2008**

**The Infrastructure Planning (Examination Procedure) Rules 2010**

**London Luton Airport Expansion Development Consent  
Order 202x**

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**8.19 STATEMENT OF COMMON GROUND BETWEEN LONDON  
LUTON AIRPORT LIMITED (TRADING AS LUTON RISING) AND THE  
EAST OF ENGLAND AMBULANCE SERVICE NHS TRUST**

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<b>Deadline:</b>	Deadline 6
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<b>Author:</b>	Luton Rising

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## **STATEMENT OF COMMON GROUND**

**This Statement of Common Ground has been prepared and agreed by (1) London Luton Airport Limited (trading as Luton Rising) and (2) the East of England Ambulance Service NHS Trust.**

Signed on Behalf of LONDON LUTON AIRPORT LIMITED (TRADING AS LUTON RISING)

Signature:

Name:

Position:

Date:

Signed on Behalf of the EAST OF ENGLAND AMBULANCE SERVICE NHS TRUST

Signature:

Name: Zoë May

Position: Head of Business Relationships

Date:

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# 1 INTRODUCTION AND PURPOSE

## 1.1 Purpose of Statement of Common Ground

- 1.1.1 This Statement of Common Ground (SoCG) relates to an application made by London Luton Airport Limited, trading as Luton Rising (“the Applicant”), to the Secretary of State for Transport under section 37 of the Planning Act 2008 (“the Act”).
- 1.1.2 The application is for an order granting development consent, known as a Development Consent Order (DCO). The draft DCO is referred to as the London Luton Airport (Expansion) Development Consent Order. The DCO, if granted, would authorise an increase of the permitted capacity of London Luton Airport (“the airport”) to 32 million passengers per annum (mppa) (“the Proposed Development”).
- 1.1.3 This SoCG has been prepared by the Applicant and the East of England Ambulance Service NHS Trust (EEAST) in respect of the Proposed Development. In particular, this SoCG focuses on:
- a. Road closures, heavy goods vehicle (HGV) and abnormal indivisible load (AIL) movements and the management of lorries during construction.
  - b. The establishment of a Transport, Community Safety Health and Wellbeing Working Group prior to construction.
  - c. Construction workers and construction phase accidents.
  - d. Engagement with EEAST through construction phase.
- 1.1.4 The purpose and possible content of SoCGs is set out in paragraphs 58-65 of the Department for Communities and Local Government’s guidance entitled “Planning Act 2008: examination of applications for development consent” (26 March 2015). Paragraph 58 of that guidance explains the basic function of SoCGs:
- “A statement of common ground is a written statement prepared jointly by the applicant and another party or parties, setting out any matters on which they agree. As well as identifying matters which are not in real dispute, it is also useful if a statement identifies those areas where agreement has not been reached. The statement should include references to show where those matters are dealt with in the written representations or other documentary evidence.”*
- 1.1.5 SoCGs are therefore, a useful and established means of ensuring that the evidence at the DCO examination phase focuses on the material differences between the main parties, and so aim to help facilitate a more efficient examination process.

## 1.2 Parties to this SoCG

- 1.2.1 The Applicant is the owner of the airport and is a private limited company wholly owned by Luton Borough Council (LBC). The airport is managed and operated by

London Luton Airport Operations Ltd through a Concession Agreement with the Applicant and LBC. This agreement lasts until 2032.

- 1.2.2 EEAST provides accident and emergency services in Bedfordshire, Hertfordshire, Essex, Norfolk, Suffolk and Cambridgeshire. It is an 'Interested Party' in the Development Consent Order (DCO) process and has been consulted during the course of the preparation of the application for development consent for the Proposed Development.
- 1.2.3 The Applicant and EEAST are collectively referred to in this SoCG as 'the parties'. The parties have been, and continue to be, in direct communication in respect of the Proposed Development.

### 1.3 Proposed Development description

- 1.3.1 The Proposed Development builds on the current operational airport with the construction of a new passenger terminal and additional aircraft stands to the north east of the runway. This will take the overall passenger capacity from 19 mppa to 32 mppa<sup>1</sup>. In addition to the above and to support the initial increase in demand, the existing infrastructure and supporting facilities will be improved in line with the incremental growth in capacity of the airport.
- 1.3.2 Key elements of the Proposed Development include:
- a. extension and remodelling of the existing passenger terminal (Terminal 1) to increase the capacity;
  - b. new passenger terminal building and boarding piers (Terminal 2);
  - c. earthworks to create an extension to the current airfield platform; the vast majority of materials for these earthworks would be generated on site;
  - d. airside facilities including new taxiways and aprons, together with relocated engine run-up bay and fire training facility;
  - e. landside facilities, including buildings which support the operational, energy and servicing needs of the airport;

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<sup>1</sup> On 1 December 2021, the local planning authority (Luton Borough Council) resolved to grant permission for the current airport operator (LLAOL) to grow the airport up to 19 mppa, from its previous permitted cap of 18 mppa. However, the application was then called-in and referred to the Secretary of State for determination instead of being dealt with by the local planning authority, and an inquiry to consider the called-in application took place between Tuesday 27 September 2022 and Friday 18 November 2022. At the time the application for development consent was submitted, the outcome of the inquiry was still unknown and, therefore, all of the core assessment undertaken for the application used a "baseline" of 18 mppa. The application by LLAOL has however since been approved, with a joint decision to grant planning permission issued by the Secretary of State for Transport and Secretary of State for Levelling Up, Housing and Communities on 13 October 2023. In anticipation of this, the Applicant's environmental assessments included sensitivity analysis of the implications of the permitted cap increasing to 19mppa. As a result, the Applicant believes that the environmental assessments are sufficiently representative of the likely significant effects of expansion, whether the baseline is 18 mppa or 19 mppa. Where the change of the baseline does affect an assessment topic, in most cases it means that the "core" assessments (using an 18 mppa baseline) report a marginally greater change than would be the case with a 19 mppa baseline. The findings of the assessment, including the sensitivity analysis, are presented in the Environmental Statement submitted with the application for development consent.

- f. enhancement of the existing surface access network, including a new dual carriageway road accessed via a new junction on the existing New Airport Way (A1081) to the new passenger terminal along with the provision of forecourt and car parking facilities;
- g. extension of the Luton Direct Air to Rail Transit (Luton DART) with a station serving the new passenger terminal;
- h. landscape and ecological improvements, including the replacement of existing open space; and
- i. further infrastructure enhancements and initiatives to support the target of achieving zero emission ground operations by 2040<sup>2</sup>, with interventions to support carbon neutrality being delivered sooner including facilities for greater public transport usage, improved thermal efficiency, electric vehicle charging, on-site energy generation and storage, new aircraft fuel pipeline connection and storage facilities and sustainable surface and foul water management installations.

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<sup>2</sup> This is a Government target, for which the precise definition will be subject to further consultation following the *Jet Zero Strategy*, and which will require further mitigations beyond those secured under the DCO.

## 2 ENGAGEMENT WITH THE EAST OF ENGLAND AMBULANCE SERVICE NHS TRUST

### 2.1 Summary of engagement

- 2.1.1 The pre-application statutory consultation carried out by the Applicant, and the way in which it has informed the application for development consent, is set out in full in the **Consultation Report [AS-048]**. As an emergency service and key social infrastructure provider, EEAST is an interested party and has been consulted on the proposals, and submitted a formal response to the consultation carried out by the Applicant.
- 2.1.2 The parties continue to be in direct communication in respect of the Proposed Development.
- 2.1.3 Having reviewed the application documents and the Relevant Representations, the ExA requested, on 13 July 2023, that the Applicant should seek to develop an SoCG with EEAST.
- 2.1.4 This SoCG between the parties is based on a programme of consultation and ongoing engagement which is summarised in Table 2-1 (below). This sets out the meetings and correspondence that took place and the topics discussed. Matters under discussion are set out in section 3.

Table 2-1: Summary of ongoing engagement with EEAST

Date	Form of correspondence	Details
4 September 2019	In-person meeting (JESIP Academy, Longfield, Hitchin Road, Stevenage, SG1 4AE)	Hertfordshire Local Resilience Forum meeting. The purpose of this meeting was to introduce the proposals and provide information about the 2019 statutory consultation.
17 September 2019	In-person meeting (Bedfordshire Fire and Rescue Service, Southfields Road, Kempston, MK42 7NR)	Bedfordshire Local Resilience Forum Executive Group meeting. The purpose of this meeting was to introduce the proposals and provide information about the 2019 statutory consultation.
1 April 2022	Email/letter	EEAST response submitted to the 2022 statutory consultation.
30 August 2022	Email/letter	Letter to EEAST to address the points raised in their statutory consultation responses and offer to meet.
07 August 2023	Virtual Meeting	Meeting between EEAST and the Applicant's team to discuss the issues raised in EEAST's relevant representation.
26 October 2023	Virtual Meeting	Meeting between EEAST and the Applicant's team to further discuss the issues raised in EEAST's relevant



Date	Form of correspondence	Details
		representation and the meeting on the 7 <sup>th</sup> of August.

### 3 MATTERS AGREED, ONGOING, OR NOT AGREED

Table 3-1: Summary of matters

SoCG ID	Matter	East of England Ambulance Service NHS Trust position	The Applicant’s position	Source of agreement	Agreed/Ongoing/Not agreed
<b>3.1 Scoping</b>					
3.1.1	Scoping	<p>Insufficient scoping work has been undertaken to date. To determine a suitable study area, baseline assessment and approach to identify the likely environmental, social and cumulative effects of the development on EEAST’s operations is required.</p> <p>It is EEAST’s position that operations and callouts for the wider Luton urban area need to be baselined in order to assess the forecasted impact of the construction phase (callouts confined to the airport are linked to operational phase impacts which are not likely to be significant), and</p>	<p>The study area and baseline assessments for the Proposed Development were set out in the Environmental Impact Assessment (EIA) Scoping Report and further refined in the <b>Environmental Statement (ES). Chapters 6 to 20 [APP-033, APP-035, APP-037 APP-041, APP-043, AS-027, AS- 076AS-077, AS-078, AS-079, AS-030, AS-031and AS-081 REP1-003 and REP3-007]</b> of the ES describe the baseline and future baseline upon which each aspect assessment for the EIA is based.</p>	Meeting on 26 October 2023.	Ongoing.

SoCG ID	Matter	East of England Ambulance Service NHS Trust position	The Applicant's position	Source of agreement	Agreed/Ongoing/Not agreed
		<p>determine suitable mitigation measures.</p> <p>Operational accident rates are noted. However, information is required to determine/forecast the 'construction phase' number &amp; type of accidents, proposed mitigation &amp; management measures. This is a key area for determining the likely/potential impact on EEAST services and resource capacity, and to inform the mitigation EEAST is seeking in terms of patient I.D, triage &amp; handover procedures, as set out fully in EEAST's representations.</p> <p>Reference to the Code of Construction Practice, Construction Management Plan, Construction Phase Plan, Emergency Plan, Construction Workers Travel Plan, Safety Leadership Group,</p>	<p>Assessments of relevance to EEAST within the <b>ES</b> include the following: <b>Chapter 13 Health and Community [AS-078]; and Appendix 13.4 Methodology for Health and Community Assessment.</b> These sections have regard to the effects on the health of the population as a result of the development.</p> <p>In this chapter, the number of workers have been estimated against each of the phases with the peak number of works being estimated as follows:</p> <ul style="list-style-type: none"> <li>- Assessment Phase 1: approx. 325 site operatives;</li> </ul>		

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		<p>Occupational Health Facilities &amp; Monitoring Plans/Programmes are welcomed. However, EEAST's involvement in all these plans/ initiatives etc, would be required in order to effectively address its concerns. A DCO Requirement or Section 106 Obligation Head of Term of Agreement, would ensure these processes are comprehensively put in place.</p>	<ul style="list-style-type: none"> <li>- Assessment Phase 2a: approx. 1,400 site operatives; and</li> <li>- Assessment Phase 2b: approx. 700 site operatives.</li> </ul> <p>It is assumed that approximately 48% of construction workers would be home based and live within commuting distance (60-minute drive). Requirements for the provision of welfare facilities at the construction site are set out in Section 5.6 of the <b>Code of Construction Practice [REP4-011]</b>.</p> <p><b>Chapter 15 Major Accidents and Disasters (MA&amp;D) [APP-041]</b> has had regard to the risk of a MA&amp;D occurring. This</p>		

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			<p>includes a description of the potential natural hazards, existing major accident hazard sources and potential sensitive environmental receptors within the study area. The existing airport has an associated residual risk of aircraft accidents. The average rate of fatal aircraft accidents in the EU is 0.1 per million flights flown.</p> <p>As set out in Section 15.7 of <b>Chapter 15 Major Accidents and Disasters (MA&amp;D) [APP-041]</b>, cargo handling and transportation centres (ports, airports, lorry parks, marshalling, yards, etc) are an industry with fewest reports of major accidents recorded on eMARS. A total of eight major accidents have</p>		

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			<p>been reported in the EU since 1979. This number doubles to 16 for centres with fuel storage facilities.</p> <p><b>Chapter 18 Traffic and Transport [AS-030] (inc. Vol 3, Appendix 18.3 Draft Outline Construction Traffic Management Plan (Outline CTMP) [APP-130])</b> has had regard to impacts on the local transport network and its users. The Study Area for which the Proposed Development is being assessed has been agreed as appropriate with the National Highways, LBC, Hertfordshire County Council (HCC) and Central Bedfordshire Council (CBC), as part of the scoping exercise. Construction related traffic movements will be</p>		

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			<p>managed by a Construction Traffic Management Plan and a Construction Workers Travel Plan (CWTP) which are detailed in Section 16 of the <b>Code of Construction Practice [REP4-011]</b>.</p> <p>The Applicant has sought information on the current number of callouts to the airport from EEAST in order to further understand EEAST's operational needs.</p> <p>The Applicant collated and shared information on construction workforce numbers, typical construction activities, and proposed emergency mitigation and management measures to assist EEAST with estimating the anticipated number</p>		

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			<p>of additional callouts required. The Applicant will engage further with EEAST to understand what additional information is requested.</p> <p>It is the Applicant's view that mention of EEAST (or specific mention of any individual stakeholders) within a number of DCO application documents would be inappropriate.</p> <p>The Applicant does not consider it necessary or proportionate to enter into a section 106 (s106) agreement or other agreement for funding.</p>		



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<h3>3.2 Traffic and Transport</h3>					
3.2.1	Construction phase compensation to EEAST	Insufficient measures are proposed to avoid, reduce, mitigate and compensate for the likely Project impact on EEAST's operations (summarised below), during the construction phase of the Proposed Development.	Noted – responses to individual points raised are provided below.	Meeting on 26 October 2023.	Ongoing.
3.2.2	Highway network impact	It is evident that a significant level of demolition and construction phase work involving large scale plant, equipment and machinery deployment/use, engineering operations, waste material arisings/deposition, import of construction material, HGV traffic generation and related road management measures are envisaged. This will lead to highway network impacts, delays and route diversions. Information to determine the effect of	An assessment of construction and operational traffic was undertaken based on the Proposed Development's design and constructability information available at the time of writing, and reported in <b>Chapter 18 Traffic and Transportation [AS-030]</b> of the <b>ES</b> and the <b>Transport Assessment [APP-203, AS-123, APP-205 and APP-206]</b> .	Meeting on 26 October 2023.  EEAST has welcomed its inclusion within the Traffic Management Working Group.	Ongoing

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		<p>increased HGV traffic and transport/road network management and route diversion measures, and its impact on EEAST's operational capacity, resources and efficiency is currently absent from the EIA and associated DCO documentation. The impact of increased HGV traffic, transport/road network management and route diversions on EEAST's operational capacity, resources and efficiency, therefore, needs to be presented and assessed - with appropriate mitigation and management measures secured within a section 106 planning obligation or Deed of Obligation, as part of any DCO approval.</p> <p>EEAST consider that the following heads of terms should form part of any legal obligations:</p>	<p>Details on HGV routing and traffic management are not confirmed at this stage. However, <b>Appendix 18.3 Outline Construction Traffic Management Plan [APP-130]</b> has been prepared and submitted with the application and the final CTMP will be agreed with the relevant highway authorities prior to commencement, once a contractor is appointed and the works are planned in detail. This is secured by Requirement 13 in Schedule 2 of the Draft DCO.</p> <p>Appropriate mitigation and management measures are outlined in <b>Appendix 18.3 Outline Construction Traffic Management Plan [APP-130]</b> and include the following:</p>		

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		<ul style="list-style-type: none"> <li>• Emergency Services Best Practice/awareness guidance to be incorporated into transport contract documentation (this clause could be included within the Construction Traffic Management Plan - DCO Requirement 14 , and a commitment is required in the SoCG at the examination stage, to incorporate measures to directly address EEAST's Principal Areas of Interest and Concerns set out in its Relevant Representation).</li> <li>• An EEAST Contract Performance Notice (CPN) and related administrative procedures contingency budget (budget and procedures for</li> </ul>	<ul style="list-style-type: none"> <li>• Vehicles making deliveries to the Site or removing spoil or demolition material will travel by designated routes which will be confirmed in the approved CTMP.</li> <li>• The design of temporary traffic management schemes will maintain an appropriate number of lanes on public roads. Lane closures will be subject to the traffic regulation process established by the DCO.</li> <li>• The lead contractor will appoint a Traffic Safety and Control Officer whose responsibilities will include the management and</li> </ul>		

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		<p>application/payment to be determined).</p> <ul style="list-style-type: none"> <li>• Terms of Reference, Membership and a Communications Strategy for establishing a Transport, Community, Safety, Health and Wellbeing Group (with EEAST attendance obligatory to make it quorate).</li> </ul>	<p>implementation of all temporary traffic management measures associated with the Proposed Development and the management of the layout of site access points.</p> <p>The Applicant has sought information on the current number of callouts to the airport from EEAST in order to further understand EEAST's operational needs.</p> <p><u>-The Applicant does not consider it necessary or proportionate to enter into a s106 agreement or other agreement for funding.</u></p> <p>The Applicant has agreed to the inclusion of EEAST within the Traffic Management Working Group which</p>		

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			<p>will be formed as a forum for stakeholder engagement prior to commencement of the Proposed Development. EEAST will be invited to be part of the working group along with representatives from the Applicant, the airport operator, the lead contractor, LBC, CBC, and Hertfordshire County Council, and National Highways. EEAST agreed to its inclusion within the Traffic Management Working Group.</p>		
3.2.3	Abnormal Indivisible Loads (AIL)	The strategy for AIL incorporating an assessment of suitable traffic access routes, road closures and diversions for accommodating AIL and related HGV movements, is to be determined by the lead contractors in	A construction traffic assessment was undertaken based on the Proposed Development's design and constructability information available at the time of writing and reported in <b>Chapter 18</b>	Meeting on 26 October 2023.	Agreed..

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		<p>consultation with the highway authorities. Consequently, information to determine the nature, type/size, frequency, route management reliance on police escort, and expected time delays associated with AILs, which are likely to directly impact on EEAST's operational capacity, resources and efficiency is currently absent from the EIA and associated DCO documentation. This impact information therefore needs to be presented and assessed - with appropriate mitigation and management measures secured within a section 106 planning obligation or Deed of Obligation, as part of any DCO approval. Measures to mitigate the impact of construction phase AIL traffic on EEAST's operational capacity, resources and efficiency</p>	<p><b>Traffic and Transportation [AS-030] of the ES and the Transport Assessment [APP-203, AS-123, APP-205 and APP-206].</b> This was supplemented by <b>Appendix 18.3 Outline Construction Traffic Management Plan [APP-130]</b> and <b>Appendix 18.4 Outline Construction Workers Travel Plan [APP-131].</b></p> <p>Detailed access and egress, plant type, movements and route management will be the responsibility of the lead construction Contractor as detailed in the <b>Code of Construction Practice (CoCP) [Appendix 4.2, REP4-011]</b> of the ES). The requirement to carry out works in accordance with the CoCP is secured through</p>		

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		<p>need to be identified and included, such as:</p> <ul style="list-style-type: none"> <li>• Emergency Services Best Practice/awareness guidance to be incorporated into transport contract documentation - access routes to Rendezvous Point (RVP)1, RVP2 and all of the fields access gates will have to be kept clear at all times to allow emergency services access.</li> <li>• An EEAST Contract Performance Notice and related administrative procedures contingency budget (budget and procedures for application/payment to be determined).</li> <li>• Terms of Reference, Membership and a Communications</li> </ul>	<p>Requirement 8 of Schedule 2 of the <b>Draft Development Consent Order [AS-067]</b>. Pre-commencement requirements to prepare a detailed Construction Traffic Management Plan (Requirement 14) and detailed Construction Workers Travel Plan (Requirement 15) are also secured.</p> <p>The lead contractor will notify the police, the highway authorities or bridge and structure owners, as appropriate, in moving abnormal loads through the road network. The lead contractor will provide the Applicant with a schedule of abnormal loads prior to the first abnormal load movement being carried out. This schedule will</p>		

SoCG ID	Matter	East of England Ambulance Service NHS Trust position	The Applicant's position	Source of agreement	Agreed/Ongoing/Not agreed
		<p>Strategy for establishing a Transport Community Safety, Health and Wellbeing Group (with EEAST attendance obligatory to make it quorate).</p> <p>To clarify EEAST has agreed to the AIL information on the basis that it is notified in advance (along with the police/highways authorities) of all planned AIL movements (in the form of a Movements Schedule).</p> <p>AIL's could form an 'agenda item' on the Traffic Management Working Group, wherein the type/size, route management, police escort, expected time delays &amp; best practice guidance to the HGV/logistics firms/contractors can be included/discussed/agreed.</p>	<p>be updated and re-issued to the Applicant as required throughout the construction period (refer to Section 4.5 of the <b>Outline Construction Traffic Management Plan [APP-130]</b>).</p> <p>The lead contractor will appoint a senior member of staff who will be the designated liaison officer responsible for the implementation, day to day management, and monitoring of the approved CTMP. That person's responsibilities would include being the principal point of contact on the site for all local groups, residents, and businesses regarding matters relating to transport (refer to Section 3.2 of <b>Appendix 18.3 Outline Construction Traffic</b></p>		



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			<p><b>Management Plan [APP-130]</b>. This would provide a point of contact between EEAST and the lead contractor.</p> <p>EEAST agreed that the information provided addressed its comments regarding ALLs.</p>		
<p><b>3.3 Health and Community</b></p>					
3.3.1	Engagement	<p>Omission to include suitable Terms of Reference, Membership and a Communications Strategy for establishing a Transport, Community Safety, Health and Wellbeing Working Group (with EEAST attendance obligatory to make it quorate) to be set up. This is to inform and assist the management of relevant aspects of the construction, operational</p>	<p>Engagement with EEAST during the pre-application stage of the Proposed Development is detailed in the <b>Consultation Report [AS-048]</b>.</p> <p>The Applicant recognises continued engagement with EEAST will be important throughout the next</p>	<p>Meeting on 26 October 2023.</p>	<p>Agreed.</p> <p><del>EEAST's inclusion on the Traffic Management Working Group is welcomed &amp;</del></p>

SoCG ID	Matter	East of England Ambulance Service NHS Trust position	The Applicant's position	Source of agreement	Agreed/Ongoing/Not agreed
		and decommissioning phases of the Proposed Development requiring a coordinated response from health and Blue light partners, including EEAST, Bedfordshire, Luton and Milton Keynes Integrated Care System (BLMKICS) (or successor organisations) Bedfordshire Police and Bedfordshire Fire & Rescue Service.	<p>stages, should a DCO be granted.</p> <p>The Applicant has agreed to the inclusion of EEAST within the Traffic Management Working Group which will be formed as a forum for stakeholder engagement prior to commencement of the Proposed Development. EEAST will be invited to be part of the working group along with representatives from the Applicant, the airport operator, the lead contractor, LBC, CBC, and Hertfordshire County Council (who are the local highway authorities) and National Highways.</p>		
3.3.2	Construction workforce	It is evident that during the three construction periods, a significant number of construction workers are	The full details of construction workforce will be determined once	Meeting on 26 October 2023.	Ongoing

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		<p>required to implement the demolition and construction stages of the Project. Information to determine the nature of the construction workforce, their home origin, health status, clinical dependencies, location of any temporary accommodation, which are factors likely to impact on EEAST's operational capacity, resources and efficiency, including its logistical response with healthcare partners, is currently incomplete and insufficiently assessed within the EIA and associated DCO documentation. This impact information, therefore, needs to be presented and assessed, with appropriate mitigation and management measures secured within a section 106 planning obligation or Deed of</p>	<p>a lead construction Contractor is appointed.</p> <p><b>Section 7.3 of Appendix 4.1 Construction Method Statement and Programme Report [AS-082]</b> of the <b>ES</b> discusses the estimated number of operatives per assessment phase. The peak number of operatives are estimated as follows:</p> <ul style="list-style-type: none"> <li>• Assessment Phase 1: approx. 325 site operatives;</li> <li>• Assessment Phase 2a: approx. 1,400 site operatives; and</li> <li>• Assessment Phase 2b: approx. 700 site operatives.</li> </ul> <p><b>Appendix 4.1 Construction Method Statement and</b></p>		

SoCG ID	Matter	East of England Ambulance Service NHS Trust position	The Applicant's position	Source of agreement	Agreed/Ongoing/Not agreed
		<p>Obligation, as necessary, as part of any DCO approval.</p> <p>An Emergency Plan as part of section 6 of the CoCP (DCO Requirement 8/ Schedule 2) is welcomed. However, a commitment is required in the SoCG at the examination stage to incorporate measures within the CoCP to directly address EEAST's Principal Areas of Interest and Concern set out in its Relevant Representation. For example, to incorporate plans and contingencies for emergency access, on-site triage, medical assessment, patient identification, stabilisation, clinical information, safe and efficient handover to EEAST responders within operationally optimal attendance times, including Helicopter Emergency</p>	<p><b>Programme Report [AS-082]</b> also details assumptions regarding the location and travel arrangements of the construction workforce. It is assumed that 60% of operatives would arrive to site by car and that the majority would live within 40 miles of Luton. The Applicant, therefore, believes that the ES does include a reasonable worst-case assessment of the likely significant effects, even if the detail is not yet fully known.</p> <p>Information regarding health status, clinical dependencies is not available at this stage. Section 7.2 of the Report <b>[AS-082]</b> details the Applicant's intention to establish a Safety Leadership Group to set</p>		

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		<p>Medical Services (HEMS) access etc.</p> <p>Information is required to determine/forecast the 'construction phase' number &amp; type of accidents &amp; proposed mitigation &amp; management measures. This is a key area for determining the likely/potential impact on EEAST service/resource capacity to inform the mitigation EEAST is seeking in terms of patient I.D, triage &amp; handover procedures, as set out fully in EEAST's representations.</p>	<p>strategic health and safety strategy and review performance including an occupational health programme.</p> <p>Requirements for the provision of occupational healthcare facilities at the construction site are set out within <b>Appendix 4.2 Code of Construction Practice [REP4-011]</b> of the <b>ES</b>. This includes the provision of first aid and occupational healthcare service on site. Appropriate health surveillance will also be provided. No regular callouts to the ambulance service from the construction site are expected.</p> <p>Requirements for the provision of emergency</p>		

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			<p>access are set out in <b>Appendix 4.2 Code of Construction Practice [REP4-011]</b> of the ES. The lead contractor will liaise with emergency services and key stakeholders, to ensure that emergency access routes, muster points, and parking for emergency services vehicles are appropriately considered and maintained during construction.</p> <p>An assessment of relevant major accident and disaster hazards is provided within <b>Chapter 15 Major Accidents and Disasters (MA&amp;D) [APP-041]</b> of the ES. The assessment concludes that, with the controls established through the DCO (e.g. in the form of the CoCP</p>		

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			<p>and the CTMP, no likely significant risks of MA&amp;Ds remain.</p> <p>The Applicant collated and shared information on construction workforce numbers, typical construction activities, and proposed emergency mitigation and management measures to assist EEAST with estimating the anticipated number of additional call outs required. The Applicant will engage further with EEAST to understand what additional information is requested.</p> <p>EEAST agreed that the information provided addressed its comments regarding the nature of the construction workforce. However, EEAST require further</p>		

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			information to forecast the 'construction phase' number and type of accidents.		
3.3.3	Engagement	In the light of the above, EEAST recommend that appropriate Terms of Reference, Membership and a Communications Strategy for establishing a Transport, Community Safety Health and Wellbeing Working Group (with EEAST attendance obligatory to make it quorate) is established, potentially in advance of the Examination. This would help to inform and assist the management of relevant aspects of the Proposed Development requiring a coordinated response from 'health and blue light partners', incorporating representatives from EEAST, the local Integrated Care Systems (ICS's) Bedfordshire Police and	<p>The Applicant recognises continued engagement with EEAST will be important throughout the next stages. Further engagement through the development of a SoCG with EEAST is currently underway.</p> <p>Refer to matter 3.3.1 of this SoCG for the Applicant's Response to the request for specific reference to EEAST within application documents and the provision of further information on accident rates.</p>	Meeting on 26 October 2023.	<p>Ongoing. <del>EEAST's inclusion on the Traffic Management Working Group is welcomed and Agreed.</del></p> <p><del>However, discussion on points raised by EEAST regarding specific mention of EEAST within a number of application documents and the inclusion of emergency services best practice/ awareness guidance in project documentation is ongoing.</del></p>



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		<p>Bedfordshire Fire and Rescue Service.</p> <p>Reference to Code of Construction Practice, Construction Management Plan, Construction Phase Plan, Emergency Plan, Construction Management Plan, Construction Workers Travel Plan, Safety Leadership Group, Occupational Health Facilities &amp; Monitoring Plans/ Programmes are welcomed however EEAST's involvement in all these plans/ initiatives etc would be required in order to effectively address its concerns – A DCO Requirement or section 106 Obligation Head of Term of Agreement would ensure these processes is comprehensively put in place.</p>			

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		As previously noted, emergency services best practice/ awareness guidance ought to be incorporated into project documentation, as required.			

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<p><b>3.4 Draft DCO</b></p>					
<p>3.4.1</p>	<p>Impacts on operational capacity</p>	<p>Review of the Applicant's Environmental Statement and related DCO documentation, indicates that the Proposed Development's potential effects (impacts) on EEAST's operational capacity, efficiency and resources (namely staff, vehicle fleet and estate assets) have not been baselined or sufficiently assessed to date.</p> <p>EEAST is therefore, keen to work with the Applicant to ensure this omission is addressed by further information being prepared to inform a robust DCO application for examination.</p> <p>In particular, EEAST wishes to agree and secure suitable mitigation and management measures as part of the</p>	<p>The <b>Transport Assessment [APP-203 to APP-206]</b> and the <b>ES</b>, submitted by the Applicant, reports the findings of its robust assessments on the transport network and on the environment.</p> <p>The Applicant considers its assessment is appropriate and robust, however, it does welcome further engagement with EEAST in order to understand their concerns.</p> <p>The Applicant has sought information from EEAST in relation to the current number of callouts to the airport in order to further</p>	<p>Meeting on 26 October 2023.</p>	<p>Ongoing</p>

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		<p>DCO Requirements and/or via a section 106 planning obligation (or Deed of Obligation) to reflect this position prior to the commencement (or at an early stage) of the Examination.</p>	<p>understand EEAST's operational needs.</p> <p>The Applicant collated and shared information on construction workforce numbers, typical construction activities, and proposed emergency mitigation and management measures to assist EEAST with estimating the anticipated number of additional callouts required. The Applicant will engage further with EEAST to understand what additional information is requested.</p>		
3.4.2	DCO Requirements	<p>Omission to include suitable DCO Requirements and/or heads of terms, either via a section 106 planning obligation or Deed of Obligation - to provide funding and new facilities provision, as required, to</p>	<p>The Applicant has endeavoured to engage with EEAST throughout the evolution of the Proposed Development and recognises that continued engagement</p>	<p>Meeting on 26 October 2023.</p>	<p>Ongoing</p>

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		<p>increase the capacity, response capability and project preparedness for EEAST's staff, vehicle fleet and estate assets to mitigate and manage the impacts arising.</p> <p>An Emergency Plan as part of Section 6 of the CoCP (DCO Requirement 8/Schedule 2) is welcomed, however, a commitment is required in the SoCG at the examination stage to incorporate measures to directly address EEAST's Principal Areas of Interest and Concern set out in its Relevant Representations, e.g. to incorporate plans and contingencies for emergency access, on-site triage, medical assessment, patient identification, stabilisation, clinical information, safe and efficient handover to EEAST responders within operationally optimal</p>	<p>with EEAST will be important going forward.</p> <p>Whilst the Applicant's assessments have not indicated a need for increased funding or facilities provision for EEAST, the Applicant is willing to engage with EEAST to further understand its concerns. EEAST have requested further information on estimated accident rates during construction in order to determine whether financial mitigation might be required to cover the potential increase in callouts.</p> <p>In reference to EEAST position on the Emergency Plan refer to matter 3.3.2 in this SoCG for the Applicant's response.</p>		

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		attendance times, including HEMS access etc.			
<p><b>3.5 Major Accidents and Disasters</b></p>					
3.5.1	Impacts on operational capacity	<p>A significant level and duration of demolition and construction phase work is envisaged, involving large scale plant equipment and machinery deployment/use, hazardous and non-hazardous waste material arisings/deposition, import of construction material, specialist construction/ engineering operations/ processes and product storage across the three construction periods. Information to determine the effect of the demolition and construction phase and its impact on EEAST’s operational capacity, resources and efficiency is currently absent from the EIA and associated DCO documentation. HSE’s</p>	<p>Detailed emergency contingency planning for the construction phase of the Proposed Development, and managing any impacts from the works, will be the responsibility of the lead contractor as detailed in the <b>Code of Construction Practice (Appendix 4.2 [REP4-011])</b> of the <b>ES</b>. The requirement to carry out works in accordance with the CoCP is secured through Requirement 7 of Schedule 2 of the <b>Draft Development Consent Order [AS-067]</b>, including a pre-commencement requirement to prepare</p>	Meeting on 26 October 2023.	Ongoing

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		<p>construction statistic publications (for Great Britain) indicate that work related incidents, involving serious injury and fatalities, are statistically significantly higher for the construction industry as compared to the 'all industry' rate. In the event of a construction phase accident, appropriate procedures would, therefore, need to be put in place for emergency access, on-site triage, medical assessment and patient identification, stabilisation and transfer to an appropriate healthcare setting. Plans and contingencies for emergency access (access routes to RVP1, RVP2 and all of the fields access gates will have to be kept clear at all times to allow emergency services access), on-site triage, medical assessment, patient identification,</p>	<p>an emergency plan that is agreed in writing with relevant planning authority.</p> <p>Whilst the estimated predicted incident rate is not available at this time, mitigation measures have been put in place for accident and incident prevention and control, as detailed in Section 6 of the <b>Appendix 4.2 Code of Construction Practice [REP4-011]</b>. The measures include:</p> <ul style="list-style-type: none"> <li>• The lead contractor will liaise with emergency services and key stakeholders, including the airport operator, to ensure that emergency access routes, muster points, and parking for emergency services</li> </ul>		

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		<p>stabilisation, clinical information, safe and efficient handover to EEAST responders within operationally optimal attendance times (noting the delay risks above) which in urgent cases may require HEMS access, are considered to be necessary. The incidence and impact of major accidents (and disasters) on EEAST and its HEMS partner operational capacity, resources and efficiency (including EEAST hazardous area response teams - HART) needs to be presented and assessed, with appropriate mitigation and management measures secured within a section 106 planning obligation or Deed of Obligation, as part of any DCO approval.</p>	<p>vehicles are appropriately considered and maintained during construction.</p> <ul style="list-style-type: none"> <li>The lead contractor's safe system of work will incorporate specific consideration of arrangements for the identification of steps necessary for safe working and the mitigation and management of risk from major accidents and disasters during construction, in a proportionate manner.</li> </ul> <p>The Applicant collated and shared information on construction workforce numbers, typical construction activities, and proposed emergency mitigation</p>		



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			and management measures to assist EEAST with estimating the anticipated number of additional callouts required. The Applicant will engage further with EEAST to understand what additional information is requested.		
<b>3.6 Efficiency and Resources</b>					
3.6.1	Impacts on operational capacity	EEAST considers that the Proposed Development is likely to give rise to significant effects on its operational capacity, efficiency and resources (incorporating its staff, vehicle fleet and estate assets) which have not been baselined or sufficiently assessed by the LLA Project to date. The Proposed Development is therefore, considered to	The <b>Transport Assessment [APP-203 to APP-206]</b> reports the findings of the assessments on the transport network and environment as required to support the application for development consent in accordance with application legislation and planning policy.	Meeting on 26 October 2023.	Not agreed

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		<p>adversely affect EEAST’s ability to meet and deliver its targets and priorities (statutory duties) as a key healthcare and emergency services provider. Inclusion of measures specific to addressing EEAST’s Principal Areas of Interest and Concern set out in its Relevant Representations are required in the SoCG at the examination stage – DCO Requirements and/or as part of the section 106 Agreement.</p>	<p><b>Chapter 15 Major Accidents and Disasters</b> of the <b>ES [APP-041]</b> includes consideration of accessibility to the expanded airport by emergency services, and describes the measures that have been incorporated into the Proposed Development to ensure that such access is not impeded.</p> <p><b>Chapter 13 Health and Community</b> of the <b>ES [AS-078]</b> includes an assessment of the effects of the Proposed Development on access to healthcare services during both construction and operation, concluding that such effects would not be significant at any assessment phase.</p>		

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			<p>The Applicant has undertaken a robust assessment as required.</p> <p>The Applicant does not consider it necessary or proportionate to enter into a s106 agreement or other agreement for funding. .</p>		
3.6.2	Impacts on operational capacity	<p>Identified impacts arising from the Proposed Development should, therefore, be addressed by employing appropriate mitigation and management measures - to be secured and implemented through DCO Requirements, and/or via a section 106 planning obligation or Deed of Obligation, as part of any DCO approval.</p> <p>This approach ought to be reflected in the SoCG to clarify the position reached and inform the forthcoming Examination process.</p>	<p>The <b>Transport Assessment [APP-203 to APP-206]</b> and <b>Surface Access Strategy [APP-228]</b> set out the monitoring and mitigation measures proposed. As part of the ongoing review process, the Applicant intends to produce monitoring programmes, assess any impacts, and then intervene accordingly if any issues persist as appropriate. The Applicant is willing to</p>	Meeting on 26 October 2023.	Not agreed

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		<p>Inclusion of measures specific to addressing EEAST's Principal Areas of Interest and Concern set out in its Relevant Representations are required in the SoCG at the examination stage.</p> <p>The measures ought to include a process to assist EEAST and its health and blue light partners to plan for and implement co-ordinated responses to construction phase (and any operational and decommissioning phase) impacts and incidents, to optimise patient outcomes.</p> <p>EEAST's operations and callouts for the wider Luton urban area need to be baselined in order to assess the forecasted impact of the construction phase (callouts confined to the airport are linked to operational phase impacts, which are not likely</p>	<p>engage further with EEAST on these points.</p> <p>The Applicant has suggested the inclusion of EEAST within the Traffic Management Working Group which will be formed as a forum for stakeholder engagement prior to commencement of the Proposed Development. EEAST will be invited to be part of the working group along with representatives from the Applicant, the airport operator, the lead contractor, LBC, CBC, and Hertfordshire County Council (who are the local highway authorities), and National Highways would be invited.</p> <p>For the Applicant's response to EEAST's point on operations and</p>		

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		to be significant) and determine suitable mitigation.	callouts please refer to matters 3.1.1 and 3.6.1.		