

December 2023

# London Luton Airport Expansion

Planning Inspectorate Scheme Ref: TR020001

Volume 8 Additional Submissions (Examination)

## **8.20 Statement of Common Ground between London Luton Airport Limited and the Bedfordshire Fire and Rescue Service**

Infrastructure Planning (Examination Procedure) Rules 2010

Application Document Ref: TR020001/APP/8.20

**The Planning Act 2008**

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

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

---

**8.20 STATEMENT OF COMMON GROUND BETWEEN LONDON  
LUTON AIRPORT LIMITED (TRADING AS LUTON RISING) AND  
BEDFORDSHIRE FIRE AND RESCUE SERVICE**

---

<b>Deadline:</b>	Deadline 6
<b>Planning Inspectorate Scheme Reference:</b>	TR020001
<b>Document Reference:</b>	TR020001/APP/8.20
<b>Author:</b>	Luton Rising

<b>Version</b>	<b>Date</b>	<b>Status of Version</b>
Issue 1	September 2023	Additional Submission – Deadline 2
Revision 1	December 2023	Additional Submission – Deadline 6

## 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) Bedfordshire Fire and Rescue Service.**

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

Signature:

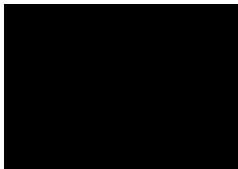
Name:

Position:

Date:

Signed on Behalf of Bedfordshire Fire and Rescue Service

Signature:



Name: Keith Irvine

Position: Stopsley fire Station manager

Date: 06/12/2023

# Contents

---

	Page	
<b>1</b>	<b>Introduction and purpose</b>	<b>1</b>
1.1	Purpose of Statement of Common Ground	1
1.2	Parties to this SoCG	1
1.3	Proposed Development description	2
<b>2</b>	<b>Engagement with Bedfordshire Fire and Rescue Service</b>	<b>4</b>
2.1	Summary of engagement	4
<b>3</b>	<b>Matters agreed, ongoing, or not agreed</b>	<b>6</b>
3.1	Surface Access	6
3.2	Emergency Service Facilities	7
3.3	Health and safety	10

## Tables

Table 2-1: Engagement between the Applicant and Bedfordshire Fire and Rescue Service

Table 3-1: Summary of matters

# 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 (LLAOL), 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 Bedfordshire Fire and Rescue Service in respect of the Proposed Development. In particular, this SoCG focuses on:
- a. Traffic within the surrounding area;
  - b. Training of personnel; and
  - c. The Memorandum of Understanding between Bedfordshire Fire and Rescue Service and the LLAOL Rescue and Fire Fighting Services (RFFS).
- 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 Bedfordshire Fire and Rescue Service is the local fire and rescue service to the airport, with two fire stations located within Luton Borough, and a number of fire stations within Central Bedfordshire and Bedford Borough. It is listed as a prescribed consultee in Schedule 1 of the Infrastructure Planning (Applications: Prescribed Forms and Procedure) Regulations 2009 and so has been consulted throughout the course of the development of the Proposed Development.
- 1.2.3 For clarity, Bedfordshire Fire and Rescue Service is a separate organisation to the fire service that exists and operates solely at Luton Airport (LLAOL Rescue and Fire Fighting Services (RFFS)). However, the two organisations work closely together and have a Memorandum of Understanding between each other. This SoCG is between the Applicant and Bedfordshire Fire and Rescue Service only.
- 1.2.4 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 Bedfordshire Fire and Rescue Service.
- 1.2.5 The Applicant and Bedfordshire Fire and Rescue Service 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 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.

---

<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.

### 1.3.2 Key elements of the Proposed Development include:

- (i) extension and remodelling of the existing passenger terminal (Terminal 1) to increase the capacity;
- (ii) new passenger terminal building and boarding piers (Terminal 2);
- (iii) earthworks to create an extension to the current airfield platform; the vast majority of materials for these earthworks would be generated on site;
- (iv) airside facilities including new taxiways and aprons, together with relocated engine run-up bay and fire training facility;
- (v) landside facilities, including buildings which support the operational, energy and servicing needs of the airport;
- (vi) 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;
- (vii) extension of the Luton Direct Air to Rail Transit (Luton DART) with a station serving the new passenger terminal;
- (viii) landscape and ecological improvements, including the replacement of existing open space; and
- (ix) 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.

---

<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 BEDFORDSHIRE FIRE AND RESCUE SERVICE

### 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 DCO application, is set out in full in the **Consultation Report [AS-048]**. As a statutory consultee, Bedfordshire Fire and Rescue Service was consulted on the proposals in accordance with section 42 of the Act. Bedfordshire Fire and Rescue Services did not submit a consultation response to Statutory Consultation in 2022.
- 2.1.2 The parties continue to be in communication in respect of the Proposed Development.
- 2.1.3 This SoCG between the parties is based on a programme of consultation and ongoing engagement which are summarised in Table 2-1. 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: Engagement between the Applicant and Bedfordshire Fire and Rescue Service

Date	Form of correspondence	Details
21 May 2019	Bedfordshire Local Resilience Forum Meeting (BLRF) – Location: Rufus Centre, Flitwick	Gave an update of progress to date including Scheme layout, Highways & Major accidents and Disasters
17 September 2019	Bedfordshire Local Resilience Forum Executive Meeting (BLRF) – Location: Bedfordshire Fire and Rescue Service, Southfields Road, Kempston, MK42 7NR	Discussion was had on the project and masterplan, safety/environmental concerns were raised and answered.
24 September 2019	Bedfordshire Local Resilience Forum Support Meeting (BLRF) – Location: Bedfordshire Police Headquarters, Woburn Road, Kempston, Bedford, MK43 9AX	Update on project, project timeline and future highway use.
19 October 2021	Bedfordshire Fire and Rescue Service (BFRS) – Teams Meeting	Discussions with regard to the proposed development, scheme changes, environmental impact assessment and major accidents & disasters.
20 December 2021	Bedfordshire Fire and Rescue Service (BFRS) – Teams Meeting	Discussion in regard to timing and engagement, future year models, junction



Date	Form of correspondence	Details
		improvements, VISSIM model, network performance and junction improvements.
3 March 2023	Email to Bedfordshire Fire and Rescue Service (BFRS)	Email sent to BFRS with updated minutes from meeting held on 20 December 2021 and link to 2022 Statutory Consultation material.
23 June 2023	Relevant Representations received from Bedfordshire Fire & Rescue Service as part of the PINS examination process.	Key topics include potential additional resources due to a higher number of people, MADs, Planning and surface access.
19 July 2023	Email	Change in personnel for Bedfordshire Fire and rescue communicated to project team.
4 August 2023	Bedfordshire Fire and Rescue Service (BFRS) – Teams Meeting	Discussion on examination timings, proposed scheme and SoCG based on relevant representations received from Bedfordshire Fire and Rescue Service.
10 August 2023	Email	Draft SoCG provided to BFRS for review and comment ahead of submission.
18 August 2023	Email	Email from BFRS confirming that they had no further comments on the SoCG ahead of Deadline 2.
30 October 2023	Bedfordshire Fire and Rescue Service (BFRS) – Teams Meeting	Discussion on SoCG points and recent fire at Luton Airport.
9 November 2023	Email	Updated SoCG sent to BFRS for review following meeting on 30 <sup>th</sup> October 2023.
15 November 2023	Email	BFRS response to updated SoCG.
22-27 November 2023	Emails	The Applicant updated SoCG and sent to BFRS for review. BFRS agreed to remaining two updates.
6 December 2023	Email	Signed SoCG returned by BFRS.

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

Table 3-1: Summary of matters

SoCG ID	Matter	Bedfordshire Fire and Rescue Service position	The Applicant position	Source of agreement	Agreed / Ongoing / Not agreed
<p><b>3.1 Surface Access</b></p>					
<p>3.1.1</p>	<p>Traffic management</p>	<p>The increased passenger and cargo traffic associated with the airport expansion may have implications for traffic management in the surrounding areas of Luton and more specifically Stopsley.</p> <p>BFRS may need to coordinate with other agencies such as the police and transportation authorities to ensure efficient emergency response times to all areas of the new expanded airport.</p>	<p>The <b>Transport Assessment [APP-203, AS-123, APP-205 and 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 programs, assess any impacts, and then intervene accordingly if any issues persist as appropriate.</p> <p>The highway mitigation measures shown within the Transport Assessment have been designed to offset the impact of additional traffic associated with the airport expansion, such that congestion and delay is not significantly increased.</p> <p>In regard to traffic during construction: the Code of</p>	<p>Meeting held on 30 October 2023</p> <p>The Applicant confirmed that BFRS can be part of the Traffic Management Working Group</p>	<p>Agreed</p>

SoCG ID	Matter	Bedfordshire Fire and Rescue Service position	The Applicant position	Source of agreement	Agreed / Ongoing / Not agreed
			<p>Construction Practice (CoCP) in <b>Appendix 4.2</b> of <b>Volume 3</b> of the <b>ES [REP4-011]</b> includes consideration of impacts from construction traffic on the highway network, and includes details on construction traffic, construction routes and closures and any impact on emergency service vehicles. Most works are off the highway network and where they are on the network, detailed construction management plans would be developed once the DCO is granted in advance of construction works taking place. In advance of construction, the Applicant will continue to consult with highway authorities and key stakeholders.</p>		
<p><b>3.2 Emergency Service Facilities</b></p>					
3.2.1	Fire Station	No local fire station has been incorporated within development to date.	The existing airport fire station, which is situated to the south-west of the airport, is being retained as it does not need upgrading to meet the requirements of the Proposed	Meeting held on 30 October 2023  BFRS agree with the Applicant's	Agreed

SoCG ID	Matter	Bedfordshire Fire and Rescue Service position	The Applicant position	Source of agreement	Agreed / Ongoing / Not agreed
			Development. Its existing location remains suitable to meet emergency response times to airfield incidents, compliant with the Civil Aviation Association’s (CAA) Rules as discussed within the <b>Design and Access Statement Volume II [AS-124]</b> .	assessment of the suitability of the airport fire station	
3.2.2	Increased demand for emergency services	With the expansion of the airport, there is likely to be an increase in air traffic, passenger numbers and infrastructure. This could lead to an increase in the numbers of incidents requiring emergency response, including aircraft emergencies, fires and other incidents on the airport premises. Bedfordshire Fire and Rescue Service (BFRS) may need to allocate additional resources or alter its existing capabilities to handle the increased demand for emergency services. BFRS will look to carry out Site Specific Risk Inspections (SSRI) prior to opening of Proposed Development facilities.	The existing airport fire station, which is situated to the south-west of the airport, is being retained as it does not need upgrading to meet the requirements of the proposed fleet of aircraft. Its existing location remains suitable to meet emergency response times to airfield incidents compliant with the Civil Aviation Association’s (CAA) Rules as discussed within the <b>Design and Access Statement Volume II [AS-124]</b> .	Meeting held on 30 October 2023	Agreed

SoCG ID	Matter	Bedfordshire Fire and Rescue Service position	The Applicant position	Source of agreement	Agreed / Ongoing / Not agreed
3.2.3	Airport specific training and equipment	The expansion of the airport may necessitate further specialised training and equipment for BFRS. Airport operations have unique challenges, such as aircraft fires, fuel spills, hazardous materials and the threat of marauder terrorist attacks. BFRS would need to ensure that their personnel continue to be trained and equipped to handle these specific scenarios effectively.	<p>LLAOL Rescue and Fire Fighting Services (RFFS) are committed to constantly building good relationships with BFRS. LLAOL Senior Fire Service Manager has recently re-engaged BFRS after a recent change in their officers and turnaround of firefighters and has committed to a new training programme that will engage with all LLAOL and BFRS watches as LLAOL now mirror the same work patterns.</p> <p>The current airport fire training facility is to be retained and later relocated as part of the Proposed Development. Details can be found in <b>Design and Access Statement Volume II [AS-124]</b> and shown on <b>General Arrangement Drawings Part 1 of 3 [AS-018]</b>.</p>	Meeting held on 30 October 2023	Agreed
3.2.4	Assembly Points	Assembly point as shown on plans required at T2 for landside incidents.	An emergency assembly point has been included within the design, north of T2 shown on <b>4.02 Scheme Layout Plans [AS-072]</b>	Meeting held on 30 October 2023 BFRS agree with the	Agreed

SoCG ID	Matter	Bedfordshire Fire and Rescue Service position	The Applicant position	Source of agreement	Agreed / Ongoing / Not agreed
				emergency assembly points as per the Scheme Layout Plans	
3.2.5	Rendezvous Points (RVP) to remain	Existing RVP next to existing Fire station to remain for coordination of airside incidents.	The Applicant agrees to the retention of the existing RVP.	Meeting held on 30 October 2023	Agreed
<h3>3.3 Health and safety</h3>					
3.3.1	Infrastructure planning	<p>The expansion of the airport will involve the construction of new buildings, runways and other infrastructure. BFRS will need to continue to work closely with the airport authorities and local planning departments to ensure that adequate fire safety measures are incorporated into the design and construction of new structures. This may involve reviewing fire safety plans, conducting inspections and providing recommendations to mitigate potential risk. It is important that this is continually considered and</p>	<p>The Applicant would like to direct BFRS to the following documents, noting that the expansion will not include the construction of new runways:</p> <p><b>Design Principles [REP5-034]</b> document has been prepared to provide stakeholders with assurance of how the future design of the project will developed in detail should the DCO be granted. Including compliance with all relevant safety and security standards.</p> <p><b>Draft Development Consent Order [REP5-003]</b> Requirement</p>	Email dated 25 November 2023 where BFRS agree to the additional wording added to explain the review process	Agreed

SoCG ID	Matter	Bedfordshire Fire and Rescue Service position	The Applicant position	Source of agreement	Agreed / Ongoing / Not agreed
		<p>reviewed during all phases of any expansion.</p> <p>This review process will follow the normal process for building applications of this size i.e. Luton Borough Council issue the plans to BFRS water/hydrant manager for consideration. These plans will then be passed to the BFRS Fire Safety Engineer to review the fire fighting installations and building design.</p>	<p>5, provides the detailed design, phasing and implementation requirements. This includes 5(1) on page 58 which states, “<i>No part of the authorised development is to commence until an application containing the detailed design of that part has been submitted to and approved in writing by the relevant planning authority</i>”.</p> <p><b>Code of Construction Practice</b> referred to in <b>ES Chapter 4 [REP5-012]</b> and also provided as <b>Appendix 4.2 to the ES [REP4-011]</b>, describes the proposed measures to manage environmental effects during construction including accident and incident prevention controls.</p> <p><b>Scheme Layout Plans [AS-072]</b>, which following discussions with emergency services, now includes an emergency assembly area within the design, north of T2. It should also be noted that the existing Rendezvous Points (RVP) next to existing fire station</p>		

<b>SoCG ID</b>	<b>Matter</b>	<b>Bedfordshire Fire and Rescue Service position</b>	<b>The Applicant position</b>	<b>Source of agreement</b>	<b>Agreed / Ongoing / Not agreed</b>
			is to remain for coordination of airside incidents.		