



Bedfordshire

Fire & Rescue Service

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Dear All,

We write regarding the application for amendments to the operation of London Luton Airport (LLA) and wish to highlight some areas related to the application and the broader environment concerning Bedfordshire Fire and Rescue Service (BFRS).

BFRS welcomes the application for expanding LLA and the increase in local commerce that will result. We want to see the project succeed for Luton, Bedfordshire, and the wider region, bringing jobs and prosperity to the area.

There are several areas that we need to bring to the attention of the board, though.

Bedfordshire is one of the UK's smallest local authority fire and rescue services. It has a primarily rural demographic and a small footprint, mostly reliant upon On-Call firefighters yet also has the challenges of the richly diverse and densely populated urban conurbation of Luton a community risk and demand profile often compared to that of a London borough. In the last fifteen years, we have seen our funding cut considerably, which has left the service with little to no spare capacity; indeed, we already struggle to deliver with the pace of change being driven centrally, such as the government's fire reform programme, recommendations arising from the Grenfell Tower and Manchester Arena Inquiry's, and the need to adopt the growing suite of standards produced by the National Operational Guidance project and the Fire Standards Board, by comparison to larger services where they can absorb that burden more easily.

The expansion of LLA will undoubtedly increase the burden on our resources at all levels of prevention, protection, and response.

Wider Bedfordshire picture:

The proposed expansion to LLA sits amid a rapidly expanding county with multiple competing factors.

Bedfordshire faces several major infrastructure projects, each needing time, effort, and resources from BFRS to see through safely. These include:

Universal Studios Resort and the associated infrastructure investment

East-West Rail

Major housing developments planned/underway, including a Milton Keynes size new town

Sundon Rail Freight terminal

Multiple large warehouse developments

The expansion of Cranfield Airport to take on traffic when Cambridge Airport closes

Each of these already draws upon BFRS resources. The proposal for Universal Studios resort will need a dedicated team to see the project through to business as usual, a level of resource we do not possess currently.

Consultation phase:

Consultation on the design and build of the proposed expansion will need the time and skills of our protection teams. To ensure compliance with our legal and statutory duties as a fire and rescue service. We are sure that LLA will employ their fire engineers when compiling the plans, but we still need to be involved in the sign-off phase of the plans.

Construction phase:

This will be a significant construction project, possibly running concurrently with several other major projects within the county. There are inherent risks, both on-site and with effects felt further afield.

Construction traffic will bring additional vehicles to the roads in an already congested area. Given the current road network, we anticipate no rise in road traffic collisions but have concerns about our ability to deliver to our stated response times standards.

How will workers on site be housed? If that is to be in a temporary construction village, then resources from BFRS are needed to manage the delivery of fire safety for that sleeping risk. If workers are to find accommodation in the local area, then that will generate a demand for HMOs within the Luton area. Managing fire safety within HMOs in the Luton area already demands our resources and would leave us stretched to deliver any more.

Under CAP 168, we recognise that LLA must provide an airfield rescue and firefighting service (RFFS); their obligations are to the airside operations and safety of aircraft and persons on board. The legal and statutory duty to respond to landside incidents, including those at construction sites and associated risks, falls to BFRS.

Into business as usual:

The expansion of LLA must be seen in the broader context. More flights and passengers will require more support, and tertiary industries will need to underpin those operations. These will be off the airport site in areas like catering, laundry, administration, and all of the functions that support mass airline operations.

We welcome new businesses to the area, but at a time of low capacity, BFRS bears the burden of prevention, protection, and response work.

The expansion of LLA will change the demographics of our population. Some will want to move away from a busier airport, and others will want to move into those areas to take on newly created jobs. This will require revisiting our community risk analysis to ensure our response resources are still in the right place, protecting the most vulnerable within our area.

There will be a significant increase in traffic on the roads, not only in passengers but also in aircrew, maintenance staff, check-in, baggage handling, and administration—every area or role supporting running a busy airport. This increase in traffic will need to be measured to ensure we can still maintain our response times to all areas and communities that BFRS serves.

An increase in traffic also relates to another issue: car parking. The airport will need to significantly increase the number of parking facilities, both on-site and off-site. We have already seen a significant fire in a car park at LLA, and the figures on the vulnerability of electric vehicles to fire are yet to mature. A fire in one of the off-site car parks could result in the loss of several thousand vehicles, and no water supplies will be mandated for them—a risk BFRS needs to factor into its planning assumptions around any airport expansion. Additional buildings, terminals, and car parks will increase the workload in the pre-planning arena. As a high-risk site, we have a duty to carry out pre-planning and risk mitigation work. This will need to be done in collaboration with the airport. Our existing operational pre-plans must be revisited, revised, and updated.

We also have a duty to test and exercise multi-agency plans against an entirely new terminal, buildings, and facilities. This applies to fires and a host of emergency scenarios, including terrorist incidents.

The need to train with and coordinate our response with LLA RFFS will be greater than before. An increased number of flights statistically increases the chances of an incident occurring, and regular confirmation training is needed not just in an airside environment but, as evidenced with the car park fire, in a broader emergency response context, too.

Resource:

While BFRS fully supports the application for LLA expansion, its impacts on us and the delivery of our statutory services should not be understated.

BFRs would like to clarify that approving this scheme, alongside other major projects within Bedfordshire, would require us to approach the central government for additional funding to generate the capacity within BFRS to enable us to deliver our functions.

We thank you in advance for your time and consideration and would welcome the opportunity to discuss the content of this letter with you in person.

Yours sincerely


Chief Fire Officer and Chief Executive

