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# London Luton Airport Expansion

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**7.11 Equality Impact Assessment**

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**7.11 EQUALITY IMPACT ASSESSMENT**

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## EXECUTIVE SUMMARY

This report presents the Equality Impact Assessment (EqIA) for Luton Rising’s (a trading name for London Luton Airport Limited) (the Applicant) proposals to expand the capacity of London Luton Airport (the airport) from 18 million passengers per annum (mppa) to 32 mppa (the ‘Proposed Development’). This EqIA has been prepared in support of the application for development consent.

The purpose of the EqIA is to identify the groups with protected characteristics, as defined in the Equality Act (2010) (Ref. 1), that may be disproportionately affected by the Proposed Development, the impacts that they may experience, and recommend mitigation measures to minimise adverse effects.

A baseline across the defined study area broken down by each of the protected groups has been prepared. A review of local policy, documentation relevant to the Proposed Development, stakeholder engagement with local authorities and key local community groups, and an evidence-based literature review have been carried out to inform the assessment.

The assessment results are provided in **Section 7** of this report, a summary is provided below.

Protected Characteristic Group	Identified Effects
Age – Children under 16	<p>An increase in noise levels from surface access noise may have adverse differential impact on children. No other differential or disproportionate effects on children have been identified.</p> <p>No differential or disproportionate effects on children have been identified in relation to air quality.</p> <p>Accessibility to public open space (Wigmore Valley Park) will not be affected during construction, as replacement open space will be provided, prior to any earthworks being undertaken. . No differential or disproportionate effects on children have been identified.</p> <p>Accessibility to public rights of way (PRoWs) may be affected during construction. This will differentially effect children as they are more dependent on pedestrian/cycle modes of transport. Improvements to PRoWs will be delivered as part of the Proposed Development, resulting in beneficial differential effects.</p> <p>The demolition of the 114 placed nursery, Prospect House Day Nursery, will result in neutral effects on children (aged 3 months to 5 years) due to additional mitigation being put in place to provide an alternative facility in close proximity to the existing site.</p>

Protected Characteristic Group	Identified Effects
Age – Young People (16-24)	<p>No disproportionate or differential effects have been identified during construction for young people accessing public open space. Replacement open space at Wigmore Valley Park will result in beneficial differential effects on young people during operation.</p> <p>Employment opportunities arising from construction and / or operation of expanded airport will result in beneficial differential effects on young people during construction and operation.</p>
Age – Older People (65+)	<p>Aircraft noise has been linked to an increase in heart problems in older people.</p> <p>No differential or disproportionate effects on older people have been identified in relation to air quality.</p> <p>No disproportionate or differential effects have been identified during construction for older people accessing public open space. Replacement Open Space at Wigmore Valley Park will result in beneficial differential effects on older people during operation.</p> <p>Accessibility to PRoW will be affected during construction. This will differentially effect older people as they are more dependent on accessible pedestrian modes of transport. Improvements to public rights of way will be delivered as part of the Proposed Development, resulting in beneficial differential effects.</p> <p>Accessibility to community facilities will not be affected by severance caused by a change in traffic speeds or volume. No disproportionate or differential effects have been identified.</p>
Disability	<p>No disproportionate or differential effects have been identified during construction for those with disabilities accessing public open space. Replacement parkland at Wigmore Valley Park will result in beneficial differential effects on and those with disabilities during operation.</p> <p>Accessibility to PRoW will be affected during construction. This will differentially effect those with disabilities who may have mobility difficulties as they are more dependent on accessible pedestrian modes of transport. Improvements to public rights of way will be delivered as part of the Proposed Development, resulting in beneficial differential effects.</p> <p>Mobility issues for people with disabilities may affect their access to and from the airport as well as access within the new terminal No disproportionate or differential effects have been identified. Mobility and</p>



Protected Characteristic Group	Identified Effects
	<p>accessibility considerations will need to be factored into the design of the Proposed Development.</p> <p>Employment opportunities arising from construction and/or operation of expanded airport resulting in beneficial differential effects in construction and operation</p>
Gender Reassignment	<p>Access to gender neutral toilets is a consideration for people undergoing gender reassignment. Improper access to toilet facilities could result in adverse differential effects. Consideration for those undergoing gender reassignment will be considered as part of the detailed design of the Proposed Development.</p> <p>Security considerations for those undergoing gender reassignment who may be more likely to be concerned about security in public spaces and could result in adverse differential effects.</p>
Marriage and Civil Partnership	<p>Scoped out</p>
Pregnancy and Maternity	<p>The World Health Organisation have identified that babies, pregnant women, and foetuses are particularly vulnerable to high noise exposure which may arise from surface access noise could result in adverse differential effects.</p> <p>No disproportionate or differential effects have been identified during construction for those who are pregnant accessing public open space. Replacement open space being provided at Wigmore Valley Park will result in beneficial differential effects on older people during operation.</p> <p>Accessibility to public rights of way will be affected during construction. This will differentially effect those who are pregnant and who may have mobility difficulties as they are more dependent on accessible pedestrian modes of transport. Improvements to public rights of way will be delivered as part of the Proposed Development, resulting in beneficial differential effects.</p> <p>Pregnant women and parents are also more sensitive to impacts arising from severance, which changes the nature of access to community facilities including health care facilities. Accessibility to community facilities will not be affected by severance caused by a change in traffic speeds and/or volume. No disproportionate or differential effects have been identified.</p>

Protected Characteristic Group	Identified Effects
	<p>The demolition of the Prospect House Day Nursery could result in neutral effects on parents with young children due to additional mitigation being put in place to provide an alternative facility in close proximity to the existing site.</p>
Race	<p>Research indicates that some ethnic groups may be more susceptible to health issues such as cardiovascular disease and other long-term health issues. Noise adversely differentially affects certain Black and Minority Ethnic (BME) groups.</p> <p>No differential or disproportionate effects on BME groups have been identified in relation to air quality.</p> <p>All individuals should have access to the relevant information and wayfinding within the airport. Individuals from ethnic minorities may not speak English as their first language and may not be able to access information within the airport.</p> <p>The <b>Employment and Training Strategy (ETS) [TR020001/APP/7.05]</b> will seek to support employment opportunities arising from construction and/or operation of an expanded airport and could result in beneficial differential effects during construction and operation.</p>
Religion or Belief	<p>Accessibility to religious facilities will not be affected by severance caused by a change in traffic speeds and/or volume.</p> <p>Religious groups and beliefs will have access to a prayer rooms within the Proposed Development. Consideration of different religious groups will be considered as part of the detailed design of the Proposed Development. No disproportionate or differential effects have been identified at this stage of design</p>
Sex	<p>Women are more likely to be concerned about security, particularly at night and in public spaces, poor lighting and security. The <b>Design Principles [TR020001/APP/7.09]</b> document sets out that the detailed design will provide safe and inclusive access for all users which should ensure that there are no adverse differential effects on women. Further considerations on lighting and security within public spaces will be considered further in detailed design.</p> <p>The <b>ETS [TR020001/APP/7.05]</b> will seek to support employment opportunities arising from construction and/or operation of an expanded airport and could result in beneficial differential effects during construction and operation</p>

<b>Protected Characteristic Group</b>	<b>Identified Effects</b>
Sexual Orientation	Scoped out.

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# 1 INTRODUCTION

## 1.1 Overview

- 1.1.1 Luton Rising (a trading name of London Luton Airport Limited) ('the Applicant') is seeking development consent to expand London Luton Airport (the airport). The application is for the expansion of the airport from 18 million passengers per annum (mppa) to accommodate 32 mppa (hereon be referred to as the 'Proposed Development').
- 1.1.2 The main elements of the Proposed Development include the following:
- 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 material 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;
  - 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>1</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..
- 1.1.3 A full description of the Proposed Development is provided in **Chapter 4** of the **Environmental Statement** (the **ES**) and details of the site and surrounding are outlined in **Chapter 2** of the **ES [TR020001/APP/5.01]**.

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<sup>1</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 Development Consent Order.

## 1.2 Purpose of this report

1.2.1 This report presents the Equality Impact Assessment (EqIA) of the Proposed Development. The EqIA assesses the impact of the Proposed Development on Protected Characteristic Groups (PCGs) as defined in the Equality Act 2010 (the Equality Act) (Ref. 1) and informs decision-making based on likely effects of these groups. This EqIA is submitted as part of the application for development consent describing how the Applicant has complied with the Public-Sector Equality Duty (PSED) (Ref. 2) under the Equality Act. The assessment is used to inform design, mitigation and other relevant project-related decisions.

## 1.3 What is an Equality Impact Assessment?

1.3.1 An EqIA considers the impact of a proposal on relevant groups who share characteristics which are protected under the Act, and informs decision-making based on likely effects on these groups. The protected characteristics defined in the Act are:

- a. age;
- b. disability;
- c. gender reassignment;
- d. marriage and civil partnership<sup>2</sup>
- e. pregnancy and maternity;
- f. race including colour, nationality, ethnic or national origin;
- g. religion, or belief;
- h. sex<sup>3</sup>;and
- i. sexual orientation (Ref. 1)

1.3.2 In addition to the PCGs outlined above the assessment also considers wider socio-economic disadvantage as outlined within Part 1 of the Equality Act 2010.

## 1.4 Key Objectives and Requirements

1.4.1 The PSED (Ref. 2) does not specify a process for complying with the duty. However, an EqIA has become a standard approach to demonstrate compliance. An EqIA is usually a qualitative assessment, which aims to consider the potential for groups with protected characteristics to be “disproportionately” or “differentially” affected by a proposed development. A disproportionate effect occurs when an impact has a greater effect on a specific group than members of the wider population. A differential effect arises when an impact affects members of a group differently to the wider population, perhaps due to specific needs, sensitivities, or vulnerabilities.

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<sup>2</sup> For the protected characteristic of marriage and civil partnership, only the first aim of the Equalities Act (preventing discrimination in the workplace) applies

<sup>3</sup> For the protected characteristic of sex, the sub-groups of men and women are used.



## 1.5 Report Structure

1.5.1 The report is presented in the following sections:

- a. **Section 2** - Legislation, policy, and guidance;
- b. **Section 3** - Assessment methodology;
- c. **Section 4** - Baseline assessment;
- d. **Section 5** - Stakeholder engagement/consultation;
- e. **Section 6** – Screening of potential equality effects;
- f. **Section 7** - Assessment of disproportionate effects on protected groups
- g. **Section 8** - In-combination climate change impacts on groups with protected characteristics
- h. **Section 9** – Cumulative effects
- i. **Section 10** – Summary and mitigation measures

## 2 LEGISLATION, POLICY AND GUIDANCE

2.1.1 The following legislation, policy and guidelines define the framework and justification for undertaking the EqlA. They define the need to undertake the assessment and outline the scope of assessment including the PCGs which should be considered within the assessment.

### 2.2 Equality Act 2010

2.2.1 The Equality Act unified previous laws and legislation to better protect people from direct and indirect discrimination in the workplace and wider society. The Act defines a number of protected characteristics. These are as listed above in **section 1.3.1**.

2.2.2 Direct discrimination is where a person is treated less favourably due to a protected characteristic. Indirect discrimination is where a range of functions e.g. policy, project or practices which, when applied the same way for everybody, causes an effect that disproportionately disadvantages people with a protected characteristic.

2.2.3 The Equality Act does not require EqlAs to be carried out but are useful measures of proving and showing compliance with the PSED, described below.

### 2.3 Public Sector Equality Duty

2.3.1 The PSED was created under the Equality Act and aims to ensure that all public bodies, or other organisations carrying out public duties, work to prevent discrimination and promote equal opportunities. The PSED covers the protected characteristics defined in the Equality Act.

2.3.2 The three aims of the PSED are in line with the Equality Act. They are to:

- a. eliminate unlawful discrimination, harassment and victimisation and other conduct prohibited by the Equality Act;
- b. advance equality of opportunity between people who share a protected characteristic and those who do not; and
- c. foster good relations between people who share a protected characteristic and those who do not.

### 2.4 HM Government- The Equality Strategy- Building a Fairer Britain 2010

The HM Government Equality Strategy (Ref. 3) sets out an approach to driving change to building a fairer society through ensuring that there are equal opportunities in Britain. To achieve a Fairer Britain, the strategy has five principles of change, which include:

- a. Creating equal opportunities for all: developing an understanding that certain groups and individuals have different needs and opportunities should be provided to ensure all individuals have an equal chance to progress.

- b. Devolving power to people: supporting participation in the democratic structures and communities to access services
- c. Transparency: achieving transparency through educating individuals and local communities on the tools and information they need to challenge organisations that are not providing fair opportunities.
- d. Supporting social action: building a more inclusive and cohesive society with tolerance and respect for all, through providing both the voluntary and public sector professionals the freedom to work together to innovate and drive effective measures.
- e. Embedding equality: embedding equality in all government policies and programmes.

## **2.5 The Family Test 2014**

- 2.5.1 The Family Test (Ref. 4) was created to ensure a family perspective when making and evaluating policies. The Test is designed to provide support and insight to policy makers on how they can better consider family impacts when making policies and focuses on strong and stable family relationships.

## **2.6 National Planning and Aviation Policy**

### **National Planning Policy Framework 2021**

- 2.6.1 The National Planning Policy Framework (NPPF) 2021 (Ref. 5) provides the overarching framework for planning policy across the UK. It focuses on achieving sustainable development across three main dimensions: economic, social, and environmental.
- 2.6.2 The NPPF highlights the role of planning in promoting healthy and inclusive communities as well as providing developments that are safe and accessible, encouraging active and continual use of public space.

### **Airports National Policy Statement 2018**

- 2.6.3 The Airports National Policy Statement (ANPS) (Ref. 6) does not have effect in relation to an application for development consent for an airport development not comprised of an application relating to the Heathrow Northwest Runway. Nevertheless, as set out within paragraph 1.41 of the ANPS, the Secretary of State considers that the contents of the ANPS will be both important and relevant considerations in the determination of such an application, particularly where it relates to London or the southeast of England. In particular, the ANPS makes clear that, alongside the provision of a new Northwest Runway at Heathrow, the government supports other airports making best use of their existing runways as set out in Beyond the Horizon: Making best use of existing runways (MBU) (Ref. 7), which is the specific policy context for this application.
- 2.6.4 In addition, whilst the ANPS does not have effect in relation to the Proposed Development, it sets out a number of principles for environmental impact assessment and compliance and these will be an important and relevant consideration in the determination of the application for development consent. A

summary of where the ANPS applies to the Equality Impact Assessment is outlined below.

- 2.6.5 The ANPS requires that impacts on affected groups be reviewed in detail and designed alongside the local community and approved by the Secretary of State. Any impacts should be able to be fully or partially mitigated for through design and operations and mitigation plans.
- 2.6.6 The ANPS takes into consideration disproportionate impacts on social groups. Paragraph 4.27 states that:
- 2.6.7 *“for any application to be considered compliant with the Airports NPS, it must be accompanied by a project level Equality Impact Assessment examining the potential impact of that project on groups of people with protected characteristics. In order to benefit from the support of the Airport NPS, the results of that project level Equality Impact Assessment must be within the legal limits and parameters of acceptability outlined in the Appraisal of Sustainability that informs the Airports NPS.”*
- 2.6.8 Equality considerations associated with the ANPS are closely related to the approach to assessing health impacts. Paragraph 4.70 states that:
- “the construction and use of airports infrastructure has the potential to affect people’s health, wellbeing, and quality of life. Infrastructure can have direct impacts on health because of traffic, noise, vibration, air quality and emissions, light pollution, community severance, dust, odour, polluting water, hazardous waste and pests.”*
- 2.6.9 Paragraph 4.71 states that:
- “new or enhanced airports infrastructure may also have indirect health impacts, for example if they affect access to key public services, local transport, opportunities for cycling and walking, or the use of open space for recreation and physical activity. It should also be noted, however, that the increased employment stemming from airport expansion may have indirect positive health impacts.”*

### **National Policy Statement for National Networks (NPSNN)**

- 2.6.10 There are no elements of the Proposed Development on the national road or rail network that would be classified as a NSIP in their own right. However, the NPSNN (Ref. 8) remains an important and relevant consideration, particularly as works are proposed on the Strategic Road Network (SRN) at Junction 10 of the M1 as part of the Proposed Development. The relevant policies of the NPSNN are consistent with the relevant policies of the ANPS and have not, therefore, been repeated here and accordingly the ANPS summary provides the necessary policy response.

### **Flightpath to the Future**

- 2.6.11 Flightpath to the Future (Ref. 9) is a strategic framework that focuses on providing key priorities for the aviation sector. The strategic framework focuses on four key themes including enhancing global impact for a sustainable

recovery, embracing innovation for a sustainable future, realising benefits for the UK and delivering for users. The final theme, delivering for users, sets out the ambition to ensure that the consumer experience is accessible and enjoyable for all and acknowledges the need to work with the industry to consider ways to improve air travel inclusivity and accessibility.

## 2.7 Regional Policy

### Hertfordshire Local Transport Plan (2018 – 2031)

- 2.7.1 In 2018, Hertfordshire County Council (HCC) published their new Local Transport Plan (HCC LTP) (Ref. 10). Overall, the plan aims to support the delivery of sustainable growth at the airport, with minimal impacts on the local road network, environment, and quality of life for residents. It also recognises surface access as a key component of expansion at the airport, and the HCC LTP notes its importance both for airport employees and local communities.

### Bedfordshire Local Transport Plan (2011 – 2021)

- 2.7.2 The Bedfordshire Local Transport Plan 2011 – 2021 (Ref. 11) sets out objectives and plans for addressing Bedford's transport issues. The overall vision is to focus efforts on walking, cycling, and public transport to ensure that those options are preferred over car. The aim is to make these modes of transport affordable, healthy, convenient, and safe, and to support objectives related to sustainability, economic growth, and improving quality of life

## 2.8 Local Policy

### Luton Local Plan, 2011-2031

- 2.8.1 Luton Borough Council (LBC) adopted the Luton Local Plan (LLP) in 2017, it is a strategic document that sets out long term visions, objectives, and spatial planning policies for the borough for the period 2011 – 2031 (Ref. 12). The following policies within the LLP that are of relevance to this EqIA are:
- a. Policy LLP6 Luton Airport Strategic Allocation
- 2.8.2 The policy is supportive of expansion at the airport provided that a full assessment is undertaken on how increased aircraft movements will impact the local environment and surrounding communities, and identify appropriate forms of mitigation in the event significant adverse effects are identified.
- 2.8.3 It is noted that Wigmore Valley Park is important to the airport Strategic Allocation. Any reconfiguration of Wigmore Valley Park will need to improve or maintain the scale and quality of open space provision.
- a. Policy LLP27 Open Space and Natural Greenspace
- 2.8.4 The policy states that development will only be permitted on open space where evidence shows that the open space is ancillary, limited in scale or complementary to the existing green space.
- a. Policy LLP38 Pollution and Contamination

- 2.8.5 Any new development must provide evidence of any potential effects on air, land, or water pollution, as well as any potential impacts on surrounding areas. Where adverse impacts are identified, appropriate mitigation will be required.

### **Luton Local Transport Plan 3, 2011 – 2026**

- 2.8.6 Two chapters within the Luton Local Transport Plan are of relevance to this assessment. Chapter 7 - 'Stronger and Safer Communities' includes policies on improving accessibility and equality of opportunity to key social infrastructure, with a particular focus on removing barriers to transport for vulnerable people such as the disabled or elderly. Chapter 8 - 'Improving Health and Wellbeing' covers issues that may affect groups with protected characteristics, such as improving air quality, access to walking and cycling routes and reducing noise pollution from transport (Ref. 13).

### **Luton Joint Strategic Needs Assessment**

- 2.8.7 Produced in collaboration between LBC, the NHS and other public-sector stakeholders, a Joint Strategic Needs Assessment (JSNA) examines current and future health and wellbeing needs, including aspects related to equalities issues such as poverty, employment, education, housing, and environment (Ref. 14).
- 2.8.8 The JSNA notes that Luton has a particularly ethnically diverse population, with relatively high levels of deprivation and associated poor health. Interventions to improve health and wellbeing include improving public transport access, better green space provision, and improving public engagement.

### **North Hertfordshire Submission Local Plan 2011-2031**

- 2.8.9 North Hertfordshire District Council's Local Plan (NHDC LP) was formally adopted in November 2022. Of relevance to this assessment, policy SP10 states that (Ref. 15):

*“We will provide and maintain healthy, inclusive communities for our residents. We will:*

- a. Support the retention of existing community, cultural, leisure or recreation facilities;*
- b. Require appropriate levels of new community, cultural, leisure and built sport & recreation facilities to be provided in new development; [and]*
- c. Protect, enhance and create new physical and green infrastructure to foster healthy lifestyles.”*

- 2.8.10 The NHDC LP highlights cross boundary issues for two strategic housing sites – East of Luton (2,100 homes) and King's Walden (16 homes). Both sites are near the airport flight paths, and mitigation measures may be required should any significant noise impact on protected groups.<sup>15</sup>

### **North Hertfordshire Transport Strategy**

- 2.8.11 North Hertfordshire District Council (Ref. 16) adopted their transport strategy in October 2017. The strategy notes that there are no direct routes to the airport



via rail or strategic road network. The strategy includes details on several large-scale proposed developments in the borough which may require improved additional transport links, including to the vicinity of the airport.

### **Central Bedfordshire Local Plan 2035**

- 2.8.12 Central Bedfordshire's Local Plan (CBLP) (Ref. 17). was submitted for examination to the Secretary of State on 30 April 2018 and was adopted in July 2021. The CBLP recognises the area to the west of Luton as a key growth location due to its strong urban-fringe position. However, the CBLP notes that the eastern section of the site may suffer from traffic and aircraft noise.

### **Dacorum Borough Council Core Strategy 2006-2031**

- 2.8.13 The Dacorum Borough Council Core Strategy (Ref. 18) sets out ambitions to anticipate and manage change in Dacorum until 2031. The Core Strategy sets out a series of challenges that it needs to meet including a Balanced and Sustainable growth, Strong, inclusive communities and a high quality and sustainable built environment.
- 2.8.14 To meet these requirements the Core Strategy sets out the vision to meet these challenges and have set a series of objectives with central themes of: Strengthening Economic Prosperity, Providing Homes and Community Services and Looking after the Environment.

### **Dacorum Local Plan (2020-2038)**

- 2.8.15 The emerging Dacorum Local Plan (Ref. 19) sets out its vision to deliver growth across the area by delivering balanced communities with homes, jobs and supporting infrastructure needed. The strategy sets out its Strategic Objectives which will underpin the delivery of growth, the objectives include promoting and facilitating sustainable transport connectivity, enabling infrastructure delivery and supporting community health, wellbeing and cohesion.

## **2.9 EqIA Guidance**

- 2.9.1 The EqIA process is designed to ensure that projects, policies and practices do not discriminate or disadvantage people and enables consideration of how equality can be improved or promoted. Guidance for the EqIA process is limited and there is no statutory guidance for how the process should be carried out. However, the Equalities and Human Rights Commission sets out the following questions that a robust EqIA should address:
- a. Is the purpose of the change/decision clearly explained?
  - b. Has the person suffered a disadvantage? Is this disadvantage due to a protected characteristic?
  - c. Have those affected by the change/decision been involved?
  - d. Have potential positive and negative effects been identified?
  - e. Are there plans to mitigate any negative effects?
  - f. Are there plans to monitor the actual effects of the proposal?

## 2.9.2 Further national guidance detailing good practice procedures includes:

- a. Government Equalities Office (2011), 'Equality Act 2010 – Public Sector Equality Duty, what do I Need to Know? A Quick Start Guide for Public Sector Organisations' (Ref. 20);
- b. Equality and Human Rights Commission (2014), 'Meeting the Equality Duty in Policy and Decision-Making' (Ref. 21);
- c. Equality and Human Rights Commission (2014), 'Engagement and the Equality Duty: A guide for Public Authorities' (Ref. 22);
- d. Equality and Human Rights Commission (2015), 'The Public-Sector Equality Duties and Financial Decisions – a Note for Decision Makers' (Ref. 23);
- e. Equality and Human Rights Commission (2017), 'Handbook for Advisors'; and (Ref. 24); and
- f. House of Commons Library (2020), 'the Public Sector Equality Duty and Equality Impact Assessments' (Ref. 25).

## 2.9.3 This EqlA draws on these guidance documents to ensure that the identification of any effects on groups with protected characteristics is robust and in line with good practice.



### 3 ASSESSMENT METHODOLOGY

3.1.1 The methodology employed for this EqlA can be split into four sections: policy review, baseline data collection, stakeholder engagement, and an assessment of the potential effects.

#### 3.2 Policy review

3.2.1 Key legislation and policy documents have been reviewed to assess how the Proposed Development should align with current legislation and policy considerations to ensure that the assessment of Proposed Development on PCGs has taken into all national and local legislative and policy requirements.

#### 3.3 Baseline data collection

3.3.1 A baseline assessment has been prepared to identify the distribution of groups with protected characteristics within the defined study area and is described in **Section 5.3** of this report. The baseline assessment for the EqlA provides the socio-demographic profile of residents living in the area surrounding the Proposed Development. The study area for the assessment is set out in **Section 4.3** and shown in **Appendix A** of this document. The baseline assessment draws upon a series of datasets outlined in further detail in **Section 3.3.3** below, to identify the level of distribution of the PCGs currently living in the study area.

3.3.2 The following indicators have been considered, which align to the PCGs within the Equality Act, as well as indicators that will be required to inform the assessment of effects. Indicators considered within the baseline assessment include:

##### ***Protected Characteristic Groups***

- a. as defined in **Section 1.3**.

##### ***Environmental Considerations***

- a. air quality;
- b. employment and economics;
- c. health and communities; and
- d. noise.

##### ***Wider socio-economic conditions***

- a. deprivation;
- b. employment status;
- c. skills and qualifications;
- d. safety and security; and
- e. walkers, cyclists and vulnerable users.

- 3.3.3 The baseline assessment is desk-based and is appropriate and proportionate. The publicly available data sets used include but are not limited to the following:
- a. the Office for National Statistics (ONS), National Census (2011);
  - b. ONS (2020), Population estimates;
  - c. ONS, Annual Population Survey (2020) and (2021);
  - d. Public Health England, Local Authority Health Profiles (2019); and
  - e. Department for Communities and Local Government, Indices of Multiple Deprivation (2019).

### 3.4 Assessment of effects

- 3.4.1 The potential disproportionate and differential effects of the Proposed Development on groups with protected characteristics have been identified. This has been informed by documents submitted as part of the application for development consent, including the **Environmental Statement (ES) [TR020001/APP/5.01]**, stakeholder engagement with relevant local authorities, baseline data and a review of publicly available literature on PCGs and infrastructure projects. Literature that has been reviewed is included in the Reference List at the end of this document.
- 3.4.2 An initial screening exercise was undertaken prior to the assessment to understand whether any protected groups could be scoped out of the assessment as they would not experience any differential or disproportionate effects as a result of the Proposed Development, the screening exercise is outlined in **Section 0** of this report.
- 3.4.3 A rating system has been used to summarise the residual effect on each PCG and outlined in **Section 7** of this report. The following three ratings have been used:
- a. **Beneficial:** The Proposed Development will have a disproportionately or differentially positive effect on a particular group with a protected characteristic. Differential and disproportionate impacts have been defined in **Section 1.4.1** of this report;
  - b. **Neutral:** The Proposed Development will have a neutral effect on the protected characteristic groups; and
  - c. **Adverse:** The Proposed Development will have a disproportionately or differentially negative residual effect on a protected characteristic group.
- 3.4.4 Where appropriate, the scale of the effect, number of people affected, duration of the effect and potential of reversibility has been assessed.

### 3.5 Design Principles and Mitigation Measures

#### Design Principles

- 3.5.1 The **Design Principles** document **[TR020001/APP/7.09]** sets out the design principles that will be followed at the detailed design stage post DCO consent. These Design Principles will be secured through the DCO and will provide

certainty as to the principles that will be applied in designing the Proposed Development

3.5.2 The **Design Principles** document [TR020001/APP/7.09] describes the principles that will apply to the whole Proposed Development and include:

- a. Design Quality
- b. Sustainability
- c. Biodiversity
- d. Landscape
- e. Noise and Vibration

### 3.6 Mitigation Measures

3.6.1 The following proposed mitigation measures are relevant to the EqIA, the measures are summarised below and the relevant topic from the ES where the mitigation is identified is referenced below:

- a. Acoustic barriers are proposed to screen receptors from noise emissions generated by ground activities at new airport infrastructure. The barrier is incorporated into each of the assessment phases (as defined in **Chapter 4** of the **ES [TR020001/APP/5.01]**) and would be relocated in each assessment phase. The location aligns with security fencing to the east of new infrastructure and approximately covers the area between the Engine Run-up Bay and the new terminal. The barrier would be approximately 4m in height but may vary to suit specific locations. (**Chapter 16** Noise and Vibration of the **ES [TR020001/APP/5.01]**).
- b. Measures included within the CoCP (provided as **Appendix 4.2** of the **ES [TR020001/APP/5.02]**) outline the Best Practicable Means implemented during construction works to manage noise and vibration.
- c. The Noise Envelope provides details on how aircraft noise will be controlled and how benefits of noise reduction from next generation technology will be shared in line with UK noise policy. Further information on measures to manage the impacts of noise and vibration on local communities is outlined within **Chapter 16** of the **ES [TR020001/APP/5.01]**.
- d. Proposed highway mitigation works described in **Chapter 4** of the **ES [TR020001/APP/5.01]** are included in the Proposed Development to reduce the adverse impact of the additional traffic on other road users (**Chapter 18** Traffic and Transportation of the **ES [TR020001/APP/5.01]**).
- e. A new bus and coach station would be provided to cater for increased passenger numbers and improve the public transport offering to the airport from local and national destinations.
- f. Pedestrian crossing facilities are provided at junctions (**Chapter 18** Traffic and Transportation of the **ES [TR020001/APP/5.01]**).
- g. The appointed contractor will make provision to limit adverse health and wellbeing effects relating to the construction of the Proposed

Development through implementation of a community engagement strategy to reduce stress and uncertainty associated with the Proposed Development (**Chapter 13** Health and Communities of the **ES [TR020001/APP/5.01]**, and the Code of Construction Practice provided as **Appendix 4.1** of the **ES [TR020001/APP/5.02]**).

- h. Mitigation measures in line with the International Civil Aviation Organization (ICAO) Balanced Approach to Aircraft Noise Management will be adopted to reduce aircraft noise as far as reasonably practicable (**Chapter 16** Noise and Vibration of the **ES [TR020001/APP/5.01]**).
- i. New building infrastructure introduced that screens receptors to the north of the Proposed Development from ground-based operational noise sources (**Chapter 16** Noise and Vibration of the **ES [TR020001/APP/5.01]**).
- j. Low noise road surfacing on the proposed Airport Access Road (**Chapter 16** Noise and Vibration of the **ES [TR020001/APP/5.01]**) has been proposed to reduce the impact of noise from road traffic.

3.6.2 Additionally, there will be a number of Public Right of Ways' (PRoW) affected by the Proposed Development, these footpaths and the proposed mitigation are detailed below:

- a. Luton Borough public footpaths FP29 and FP38 and public bridleways BW28 and BW37, which follow along the eastern edge of the existing airfield and south east boundary of Wigmore Valley Park, will remain accessible during assessment Phase 1 but will be stopped up during assessment Phase 2a to facilitate the Proposed Development.
- b. Bridleway Kings Walden 052 will be upgraded to a multi-user track between Darley Road and Colemans Road during assessment Phase 1.
- c. A surfaced path to be delivered within the Replacement Open Space (Work No. 5b(02)) in assessment Phase 1, between Luton Borough footpath FP38 and the junction with public footpath Kings Walden 043 west of the mature hedgerow on the ridgeline of Winch Hill, would be formally adopted as a public footpath during construction for assessment Phase 2a.
- d. A section of public footpath Kings Walden 041 would be upgraded to a multi-user track, within the Replacement Open during construction for assessment Phase 1, between the junction with public footpath Kings Walden 043 and the existing field entrance off Darley Road (south of Green Acres); and would be formally adopted as a public bridleway during construction for assessment Phase 2b. The section between Winch Hill Road and the field entrance off Darley Road (south of Green Acres) remaining as a public footpath.
- e. A surfaced path to be constructed as a multi-user track will be constructed during construction for assessment Phase 1, within the Replacement Open Space, located east of the coniferous plantation woodland and leading south from public footpath Kings Walden 043 to the edge of the Replacement Open Space. The track would be formally

adopted as a public bridleway during construction for assessment Phase 2b.

- f. Section of public footpath Kings Walden 043, within the Replacement Open Space, between the junction with public footpath Kings Walden 041 and the proposed multi-user track, would be upgraded to a multi-user track during construction for assessment Phase 1 and formally adopted as a public bridleway during construction for assessment Phase 2b.
- g. A new multi-user track would be delivered between the Replacement Open Space and Luton Borough bridleway BW37 during construction for assessment Phase 2b, to the east of the proposed Fuel Storage Facility (Work No. 4c.01) and Water Treatment Plant (Work No. 4d) and west of Winch Hill Wood, and would be afforded bridleway status
- h. Connectivity along retained section of Luton Borough bridleway BW37 leading west from junction with Winch Hill Road (south of Winch Hill Wood) to junction with new multi-user track to be restored for assessment Phase 2b.

3.6.3 Mitigation measures to reduce any disproportionately adverse effects on PCGs with protected characteristics and where practicable, to enhance positive effects and promote equality of opportunity have been proposed. The ES includes a description of the measures envisaged to prevent or reduce any significant adverse effects.

3.6.4 Where practicable these have been incorporated in the design of the Proposed Development, or appropriate commitments secured in documents such as the CoCP (**Appendix 4.2** of the **ES [TR020001/APP/5.02]**) submitted with the application for development consent to ensure they are accounted for in the design and delivery phases of the Proposed Development. A comprehensive list of the mitigation measures and how they would be secured is provided in the **Mitigation Route Map [TR020001/APP/5.09]**.

3.6.5 In addition to the mitigation measures set out above, the following measures would be adopted by the Proposed Development and are of particular relevance to the EqIA:

- a. appropriate measures to reduce emissions to air (**Chapter 7** Air Quality of the **ES [TR020001/APP/5.01]**)
- b. Develop and implement a stakeholder communications plan that includes community engagement before work commences on site, as described in the CoCP (**Appendix 4.2** of the **ES [TR020001/APP/5.02]**).
- c. Best practice construction noise and vibration management measures described in the CoCP (**Appendix 4.2** of the **ES [TR020001/APP/5.02]**).
- d. **ETS [TR020001/APP/7.05]** – Outlines how the future construction skills requirements will be met.
- e. Off-site construction traffic movements would be managed in compliance with the Construction Traffic Management Plan (CTMP) (an Outline CTMP is provided as **Appendix 18.3** of the **ES [TR020001/APP/5.02]**)

## 3.7 Community Fund

3.7.1 The Applicant intends to introduce a fund aimed specifically at tackling adverse effects of airport expansion not addressed by mitigation already included elsewhere in the Proposed Development. The Applicant is calling this Community First. The purpose of Community First is to provide a source of funds for local authorities surrounding the airport to be used in ways to enhance the distribution of the benefits of the Proposed Development. Particularly for those who live around the airport or who would be affected by its expansion including Protected Characteristic Groups. Further details are provided in the **Draft Compensation Policies, Measures and Community First** document [TR020001/APP/7.10].

## 3.8 Assumptions

3.8.1 The following assumptions have been applied to this:

- a. The EqIA draws on conclusions made on the residual significant effects after mitigation measures have been identified by other aspects of the ES i.e. replacement open space and acoustic screening, have been taken into account.
- b. Proposed enhancements to Wigmore Valley Park under the extant planning consent for Green Horizons Park (formerly New Century Park) (i.e. the improved skate park and play facilities, the improved Wigmore Pavilion and most of the proposed surfaced footpaths), alongside the removal of any existing vegetation necessary to facilitate these works, would be undertaken under that planning consent alongside or in advance of works to deliver the replacement open space during construction for assessment Phase 1.
- c. All works to deliver the replacement open space are assumed to be undertaken during construction for assessment Phase 1, with areas made available for use by the public before the end of 2025.

## 3.9 Limitations

3.9.1 The limitations related to the EqIA are set out below:

- a. Publicly available data is limited or non-existent for some protected characteristic groups. For example, the National Census has a binary approach to gender (i.e., male or female), which makes it difficult to assess transgender or non-binary people. Further, the National Census does not collect any information on sexual orientation, which limits understanding on the topic and wider spatial distribution of those within the related protected characteristic groups. Therefore, where possible the above sources have been supported by desk-based research to provide additional coverage for equalities indicators that are not recorded in national data collection.
- b. There has been an extensive engagement process undertaken to date and it has ensured that materials were made available to all groups and that all groups were able to submit comments on the proposals e.g.

consultation materials were translated to specific languages where requested. It is noted that some groups may not have engaged with the scheme through this process and did not provide their views on the Proposed Development

- c. Challenges may also exist in assessing impacts on Travellers due to a shortage of suitable data on people with transient residence or without permanent residence.
- d. This EqIA is based on the findings of other topic assessments included in the ES such as **Chapter 7** Air Quality, **Chapter 16** Noise, **Chapter 13** Health and Communities and **Chapter 18** Traffic and Transportation of this **ES [TR020001/APP/5.01]**. Therefore, the assumptions and limitations relevant to those topics may also apply.
- e. The implications on PCGs are based on the level of design information available at this stage.



## 4 BASELINE ASSESSMENT

### 4.1 Stakeholder engagement

- 4.1.1 Stakeholder engagement has been carried out with key local authority representatives and local interest groups outlined in **Section 5** of this report. The approach to this engagement is described in **Section 5** of this report.

### 4.2 The Proposed Development

- 4.2.1 An overview of the Proposed Development is provided in **Section 1.1** of this document and a full description is provided in **Chapter 4** of the **ES [TR020001/APP/5.01]**. Of particular relevance to this EqIA is the provision of open space which is summarised below.
- 4.2.2 The replacement open space would be located to the east of the existing greenspace at WVP and would provide a total area of 47.6ha open space (enhanced existing and replacement). It would be delivered in assessment Phase 1 ahead of the main earthworks taking place within the existing WVP that are not associated with the replacement open space. The proposed layout, habitats and facilities for the replacement open space are shown in **Figure 14.11** of the ES **[TR020001/APP/5.03]**.
- 4.2.3 The replacement open space has been located to be accessible to the adjoining communities it serves, including the future communities promoted under emerging policy to the east of Luton, and would include several surfaced paths to upgrade connection into the surrounding communities and PRow network.
- 4.2.4 The open space would retain the existing main entrance into WVP, adjoining Wigmore Hall/Wigmore Pavilion, and would incorporate several of the enhanced facilities proposed to be delivered in this area as part of extant planning consent for Green Horizons Park (i.e. the improved skate park and play facilities, the improved Wigmore Pavilion and most of the proposed surfaced footpaths).
- 4.2.5 Public access within the replacement open space would be encouraged through the resurfacing and in some instances upgrading, of existing PRow and through the creation of new surfaced paths.
- 4.2.6 A range of users would be encouraged to make use of the enhanced and replacement open space, including but not limited to; families, teenagers, school groups, the elderly, walkers, joggers, plane-spotters, cyclists, skaters and horse riders, and appropriate signage and facilities would be accommodated to help facilitate these various user groups.
- ### 4.3 Study Area
- 4.3.1 A map showing the Study Area for this EqIA is provided in **Appendix A** to this report. The Study Area for the direct impact of the Proposed Development has been assumed to be 1km in line with industry best practice, where impacts are identified by ES topic assessment outside of this area, this assessment considers those receptors where appropriate.



- 4.3.2 To ensure that this assessment takes into account local variations in the concentration of PCGs the Study Area comprises wards within the following Local Authorities; Luton, Central Bedfordshire, North Hertfordshire, St Albans and Dacorum. The baseline assessment identifies data at both the local authority level and outlines potential local variations within each local authority.
- 4.3.3 The Study Area is predominantly characterised by largely rural areas, with Luton Town located to the north and east Order Limits. The area to the north of the Proposed Development in Luton is predominantly residential, with some mixed commercial activities to the north and west. Land to the east and south of the airport is predominantly rural agricultural fields in North Hertfordshire and Central Bedfordshire respectively.

## 4.4 Demographic Profile

- 4.4.1 This section uses demographic data to present the baseline statistics on groups with protected characteristics in the study area.
- 4.4.2 A series of demographic maps have been prepared based on a series of data sets presenting the spatial distribution of groups with protected characteristics in the local area. These are provided in **Appendix B** of this document and include figures showing:
- a. English Index of Multiple Deprivation (LSOA Level, 2015, MHCLG)
  - b. Proportion of the Population Aged 15 or Under (ONS 2019 Population Estimates)
  - c. Proportion of the Population Between 16 and 24 Years (ONS 2019 Population Estimates)
  - d. Proportion of the Population Over the Age of 65 Years (ONS 2019 Population Estimates)
  - e. Proportion of the Population that Identifies as having Religious Faith (LSOA Level, 2011 Census)
  - f. Proportion of the Population that is BAME (LSOA Level, 2011 Census)
  - g. Proportion of the Population that is Female (ONS 2019 Population Estimates)
  - h. Proportion of the Population whose Activities are Limited due to Long-Term Illness or Disability (LSOA Level, 2011 Census)
- 4.4.3 Information provided by LBC, along with work conducted by the Applicant's community consultation team, has provided further information regarding the representation of protected characteristics groups in the area, and any issues or sensitivities relating to PCGs in the study area.

### Population and Sex

- 4.4.4 According to the 2020 Population Estimates, Luton had a total population of 213,528 and is comprised of 51% males and 49% females. There is a slightly higher percentage of males in Luton compared to neighbouring local authorities and at a regional and national level (See **Table 4.1**). The gender split varies at

ward level within Luton, ranging from 55.1% males and 44.9% females in South Ward, to 48% males and 52% females in Northwell Ward.

Table 4.1 Population composition (Ref. 26)

Area	Total Resident Population	% Males	% Females
Luton	213,528	51.0	49.0
St Albans	148,452	49.0	51.0
Central Bedfordshire	288,648	49.3	50.7
North Hertfordshire	133,570	49.0	51.0
Dacorum	155,500	49.0	51
East of England	6,236,072	49.3	50.7
England	56,286,961	49.5	50.5

### Age structure

4.4.5 **Table 4.2** shows that Luton has a younger population when compared to surrounding districts, the East of England and England as a whole, with 24.7% of the population in Luton aged 15 or under compared to 19.2% nationally. Furthermore, 62.7% of the population were of working age (16-64) in Luton, compared to 60.6% in the East of England and 62.3% nationally.

4.4.6 The young age profile is also reflected in the smaller proportion of the population over the age of 65 (12.6%), which is lower than surrounding authorities and regional (20%) and national (18.5%) averages (Ref. 26).

Table 4.2 Population structure by location (Ref. 26)

Area	Children (0-15) %	Young people (16-24) %	Older people (65+) %
Luton	24.7	10.5	12.6
St Albans	22.3	8.4	17.2
Central Bedfordshire	20.0	8.6	17.9
Dacorum	20.7	8.6	17.5
North Hertfordshire	19.6	8.2	19.4
East of England	19.4	9.6	20.0
England	19.2	10.5	18.5

### Disability and health

4.4.7 The percentage of residents in Luton with a long-term illness or disability at 15.1% is lower than regional (16.47%) and national (17.6%) averages but is

higher than levels found in surrounding districts (St Albans: 12.9%, Central Bedfordshire: 14.4%, North Hertfordshire: 15.1%) (see **Table 4.3**).

Table 4.3 The percentage of residents with limited long-term illness or disability (Ref. 27)

Area	Limited long-term illness or disability (% of usual population)
Luton	15.1
St Albans	12.9
Central Beds	14.4
Dacorum	14.7
North Herts	15.1
East of England	16.7
England	17.6

- 4.4.8 According to Public Health England (Ref. 28) in 2019/20 3.85% of adults in Luton had a learning disability and were receiving long-term support from the local authority, this is higher than both the regional (3.62%) and the national (3.46%) averages. Health Watch Luton have outlined in a report exploring learning disabilities in Luton that there were around 4 people per 1000 with a learning disability and/or autism in Luton, above the national average for England (Ref. 29).
- 4.4.9 LBC's Annual Public Health Report (APHR) quantifies the health of the local population and provides recommendations and key aspirations for the wider borough. The APHR identified that there is a 53.6% gap in the employment rate of those with a learning disability and the overall employment rate. This is significantly lower than the national average for England, which is 63.2% suggesting that a higher rate of those with disabilities are in employment compared to the national average.
- 4.4.10 Public Health England produces annual borough-level health profiles which aim to provide local government and health and social services with a better understanding of local community needs. The most recent profile for Luton highlights the inequalities present across the borough (Ref. 30)
- 4.4.11 The health profile also identifies Luton as performing 'worse' than England against the following indicators of relevance to this assessment:
- children under 16 in low-income families;
  - prevalence of obesity;
  - life expectancy at birth (male and female);
  - under 75 mortality due to cardiovascular disease; and
  - under 75 mortality from all causes.

## Gender reassignment

- 4.4.12 There are no official statistics relating to gender reassignment and the UK Census currently only collects data relating to sex (gender assigned at birth). The Office for National Statistics (ONS) has identified a need for information about gender identity for policy development and service planning with these requirements strengthened by the need for information on those with the protected characteristic of gender reassignment as set out in the Equality Act.

## Marriage and civil partnerships

- 4.4.13 **Table 4.4** shows the percentage of the population in Luton who are married (46.6%) is lower than the levels found in neighbouring districts (St Albans: 54.1%, Central Bedfordshire: 52.5%, North Hertfordshire: 51.2%) and the East of England (49.9%) but is the same as national averages (46.6%). The difference between Luton and surrounding authorities may be due to its younger-than-average population.
- 4.4.14 The percentage of the population in Luton in a registered same-sex civil partnership (0.2%) is slightly higher than the percentage found in Central Bedfordshire (0.1%), but the same as the level for the remaining surrounding districts, the East of England, and national averages (0.2%) (Ref. 31).

Table 4.4 The percentage of the population aged 16+ that are married or in a registered same-sex civil partnership (Ref. 31)

Area	% of 16+ that are married	% of 16+ that are in a registered same-sex civil partnership
Luton	46.6	0.2
St Albans	54.1	0.2
Central Beds	52.5	0.1
North Herts	51.2	0.2
Dacorum	49.9	0.1
East of England	49.9	0.2
England	46.6	0.2

## Pregnancy and maternity

- 4.4.15 **Table 4.5** outlines the number of live births in the study area, East of England, and England. This shows both Luton and Central Bedfordshire have higher birth rates in 2020 compared to the other local authorities within our study area.

Table 4.5 Birth Statistics (Ref. 32)

Geography	Live Births
Luton	3,287
St Albans	1,494
Central Beds	3,230
North Herts	1,399
Dacorum	1,744
East of England	64,313
England	585,195

4.4.16 Pregnant individuals also need good access to health care facilities, particularly towards the latter stages of pregnancy. Accessibility is therefore an important issue for this group. The Bedfordshire, Luton and Milton Keynes Health and Care Partnership outlines a range of local hospitals that provide pregnancy and maternity services including Luton and Dunstable Hospital, Bedford Hospital and Milton Keynes University Hospital (Ref. 33).

4.4.17 Pregnant individuals can be more susceptible to experience negative effects associated with development and the built environment. For example, pregnant women can be more susceptible to poor air quality, which can have a negative impact on birth weight.

### Race

4.4.18 According to the 2021 Annual Population Survey, Luton has an ethnically diverse population composition, with 40.7% of the population from Black, and Minority Ethnic (BME) backgrounds. This is significantly higher than the proportion in neighbouring boroughs and across the East of England (8.8%) and England (13.8%) as a whole, as shown in **Table 4.6** (Ref. 34).

4.4.19 Conversely, Wigmore ward has a higher proportion of white residents (82.9%) than surrounding areas and the wider Luton borough average and is more in line with the national average of 85.4%. The borough average for Asian/Asian British population (30.0%) is significantly higher than observed in the wards immediately surrounding the airport (Ref. 35).

Table 4.6 Ethnicity by area (as % of usual resident population) (Ref. 35) (! denotes no data)

Area	White (%)	Mixed/multiple ethnic groups (%)	Indian, Pakistani, Bangladeshi (%)	Black/African/Caribbean/Black British (%)	Other ethnic group (%)
Luton (District)	59.6	1.5	22.1	11.2	5.5
St Albans (District)	90.4	2.9	1.4	1.4	3.8
Central Bedfordshire (District)	92.2	1.7	1.3	2.0	2.6
North Hertfordshire (District)	92.6	!	2.2	1.2	2.0
East of England (Region)	91.2	1.3	2.7	2.1	2.7
England (National)	86.2	1.5	5.2	3.4	3.7

## Religion and belief

4.4.20 **Table 4.7** shows that Christianity is the largest religious group in Luton, making up nearly half (47.4%) of the borough's population. This is notably lower than the regional (59.7%) and national (59.4%) averages. Approximately a quarter of the resident population describe their religion as Muslim (24.6%), which is substantially higher than the East of England (2.5%) and national (4.8%) averages. Similarly, there are also higher than average proportions of residents who identify as Hindu (3.3%) and Sikh (1.2%). Luton has a significantly smaller proportion of residents who stated that they have no religion (16.5%) than regional (27.9%) and national (25.1%).

Table 4.7 Faith by location (as a % of usual resident population) (Ref. 36)

Area	Christian (%)	Buddhist (%)	Hindu (%)	Jewish (%)	Muslim (%)	Sikh (%)	Other Religion	No Religion
Luton (District)	47.4	0.3	3.3	0.2	24.6	1.2	0.4	16.5
St Albans (District)	59.7	0.4	1.3	1.2	3.7	0.2	0.3	25.8
Central Beds (District)	62.2	0.3	0.7	0.2	0.8	0.3	0.3	28.4
North Herts (District)	57.0	0.5	1.0	0.2	1.1	1.9	0.5	30.4
East of England (Region)	59.7	0.4	0.9	0.6	2.5	0.3	0.4	27.9
England (National)	59.4	0.5	1.5	0.5	5.0	0.8	0.4	24.7

## Sexual orientation

- 4.4.21 Data on sexual orientation was not collected by the 2011 census, and there is little data available at lower geographical levels. Based on 2018 estimates, 2.2% of the population in the East of England identify as gay, lesbian or bisexual, compared to the highest rate which is seen in London at 3.8%, and the English average of 2.7% (Ref. 37).

## Deprivation

- 4.4.22 The Index of Multiple Deprivation (IMD) (2019) provides a suitable proxy to identify concentrations of vulnerable groups including those belonging to protected characteristic groups. The IMD, last updated in 2019, provides an overall measure of deprivation and has been developed by combining seven domains of deprivation. The seven domains that form the index are as follows (Ref. 38):
- a. **Income deprivation:** The proportion of the population experiencing deprivation relating to low income, including those individuals that are out-of-work and those that are in work but who have low earnings (satisfying the respective means tests).
  - b. **Employment deprivation:** The proportion of the working-age population within an area, involuntarily excluded from the labour market, including those individuals who would like to work but are unable to do so due to unemployment, sickness or disability, or caring responsibilities.
  - c. **Education, skills, and training deprivation:** The lack of attainment and skills in the local population.
  - d. **Health deprivation and disability:** The risk of premature death and the impairment of quality of life through poor physical or mental health. Morbidity, disability, and premature mortality are also considered, excluding the aspects of behaviour or environment that may be predictive of future health deprivation.
  - e. **Crime:** The risk of personal and material victimisation at local level.
  - f. **Barriers to housing and services:** The physical and financial accessibility of housing and local services, with indicators categorised into sub-domains:
    - i. 'Geographical Barriers': relating to the physical proximity of local services.
    - ii. 'Wider Barriers': relating to access to housing, such as affordability.
  - g. **Living environment deprivation:** The quality of the local environment, with indicators falling categorised in two sub-domains:
    - i. 'Indoors Living Environment' measures the quality of housing.
    - ii. 'Outdoors Living Environment' measures air quality and road traffic accidents.
- 4.4.23 The IMD is the government's official measure of deprivation and it ranks every district in England. Districts across the country have been ranked where 1 is the



most deprived group out of 326 districts. **Table 4.8** shows district level rankings. Overall, Luton is more deprived compared to neighbouring authorities of North Hertfordshire, Central Bedfordshire, and St Albans, all of which have significantly lower levels of deprivation.

Table 4.8 Districts according to the IMD average score

Area	IMD Rank of average score (where 1 is most deprived out of 326 districts)
Luton (District)	70
St Albans (District)	306
Central Beds (District)	254
North Herts (District)	270
Dacorum	240

### Walkers, Cyclists and Vulnerable users

- 4.4.24 This EqIA also includes an assessment of walkers, cyclists, and vulnerable users, many of which have protected characteristics, who use the PRow network within the study area. Vulnerable users include in particular children, older people, individuals with disabilities and parents with pushchairs.
- 4.4.25 Households without cars or vans in the household as a percentage of all households in Luton is 27.4%. This indicates that the study area generally has higher proportion of households without a car, then what is found across the region (18.5%).
- 4.4.26 The airport is strategically located in relation to the highway network. Luton Airport Parkway Railway Station, which is 2.1 km away from the airport terminal building, is served by the operators, East Midlands Railway (EMR) and Thameslink. There are currently shuttle buses between Parkway Station and the public transport hub (PTH) at the airport. When opened, the new Luton Direct-Air-Rail-Transit (Luton DART) will provide a direct rail connection between Luton Airport Parkway Railway Station and the existing terminal. This will be extended to the new Terminal as part of the Proposed Development
- 4.4.27 The PTH, which is located adjacent to the terminal, has 17 bus stands allocated for specific services. It also accommodates for rail-air shuttle and shuttle buses linking staff car parks and the car hire facility. There will be convenient public transport interchange facilities at T2 but drop-off and pick-up points for the stage and shuttle buses will be separate to that provided for coach services. There are also coach links between the airport and central London, Northampton, High Wycombe, Oxford, Leicester, Nottingham, Coventry, Birmingham, Wolverhampton, and Cambridge, and offer a high frequency, low-cost option. The most frequent local bus service goes between Luton Station and Dunstable. There are also bus services that go between Luton town centre, Stopsley, and Wigmore.



## Employment

- 4.4.1 **Table 4.9** shows that Luton has a high proportion of people who are economically inactive and unemployed. The percentage of people who are economically active is lower in Luton (76%) than surrounding districts, the East of England (80.5%) and England as a whole (79.1%). The proportion of people who are economically inactive in Luton (24%) is substantially higher than rates found in neighbouring districts, the regional (19.5%) and national (20.9%) rates. Moreover, the unemployment rate (5.8%) is also higher than that of surrounding districts, the region (3.6%) and England (4%) (Ref. 39).
- 4.4.2 The gender gap in economic activity is larger in Luton when compared to the national average. 30.4% of working age women in Luton are economically inactive compared to 24.7% across England as a whole. In the surrounding districts the rate of economically inactive women is lower than found in Luton.
- 4.4.3 The percentages in **Table 4.9** do not fully capture the impacts of Covid19, which have affected employment levels since the onset of the pandemic. The pandemic has caused a drastic contraction of the aviation industry, likely to affect local jobs in Luton. According to Centre for Cities, Luton is currently one of the top 4 cities in the UK with the highest unemployment claimant count rate (8.1%), which is significantly higher than the pre-Covid19 rate of 3.4% in Luton (Ref. 40).
- 4.4.4 The Annual Population Survey provides granular detail on different forms of economic activity. It states that the most prevalent form of economic inactivity in Luton is 'Looking after family' (34.8%), compared to 20.3% in East of England and 20.4% nationally. The levels of those who are temporary (2.7%) and long-term sick (21.7%) in Luton are also marginally higher for temporary sickness and lower for long term sickness than compared to regional (1.7% and 22.0%) and national (1.8% and 22.7%) averages (Ref. 39).

Table 4.9 Economic activity for ages 16-64 by gender and location (! denotes unavailable information) (Ref. 39)

	<b>Variable</b>	<b>Luton (%)</b>	<b>St Albans (%)</b>	<b>C. Beds (%)</b>	<b>North Herts (%)</b>	<b>Dacorum (%)</b>	<b>East of England (%)</b>	<b>England (%)</b>
All 16-64	Economic active	76.0	82.4	82.2	87.0	81.7	80.5	79.1
	Economically active: In employment	70.3	78.6	80.0	83.1	79.1	76.9	75.1
	Economically active: Unemployed	5.8	4.7	2.1	3.7	2.9	3.6	4.0
	Economically Inactive	24.0	17.6	17.8	13.1	16.1	19.5	20.9
Males	Economic active	82.8	89.6	86.4	90.8	79.2	84.8	82.9
	Economically active: In employment	77.1	87.8	82.8	88.4	77.7	81.5	78.5
	Economically active: Unemployed	5.8	1.7	3.6	!	!	3.3	4.5
	Economically Inactive	17.2	10.4	13.7	9.0	11.8	15.2	17.1
Females	Economic active	69.6	77.0	77.9	82.6	84.0	76.3	75.3
	Economically active: In employment	63.8	75.0	77.3	77.7	80.4	72.4	71.8
	Economically active: Unemployed	5.9	2.0	!	5.1	!	3.9	3.5
	Economically Inactive	30.4	22.8	22.2	17.2	19.8	23.7	24.7

## Skills and Qualifications

4.4.5 The national vocational qualifications (NVQ levels) (Ref. 41) and **Table 4.10**, show that educational attainment is generally lower across Luton than found in surrounding areas, as well as nationally. In fact, 9.8% of those aged 16-64 in Luton have no qualifications, significantly higher than the national average of 6.6%. Similarly, only 37.1% of the working age population have level 4 or above qualifications, relatively lower than the national average of 43.6% and significantly lower than that of neighbouring area, St Albans, at 65.9%. This can adversely impact the ability of residents to compete in the labour market.

Table 4.10 Level of qualifications for all usual residents aged 16-64 (! denotes unavailable information) (Ref. 41) (Ref. 42)

Qualification	Luton (%)	St Albans (%)	C. Beds (%)	North Herts (%)	Dacorum	East of England (%)	England (%)
No qualifications (%)	9.8	!	5.5	!	6.5	5.8	6.6
Level 1 qualifications (%)	79.5	92.8	90.8	98.2	83.5	88.5	87.5
Level 2 qualifications (%)	72.5	87.2	78.3	94.8	73.9	76.7	78.1
Level 3 qualifications (%)	54.4	75.8	62.6	77.9	48.3	58.2	61.5
Level 4 and above qualifications (%)	37.1	65.9	41.7	60	38.3	39.6	43.6

## Safety and Security

4.4.6 The feeling of safety and security for every individual is integral for ensuring their personal wellbeing. Everyone is vulnerable to feelings of being unsafe, however these may be heightened for individuals belonging to certain protected characteristic groups, including young people, older people, disabled people, women, and people belonging to a particular ethnicity, sexual orientation or undergoing gender reassignment (Ref. 43).

- 4.4.7 The top three reported crimes within the area of the Proposed Development between July 2020 and August 2021 are Anti-social behaviour (62), Other theft (43), and Possession of weapons (43). There were also 36 reports of violence and sexual offences and 31 incidences of shoplifting (Ref. 44).

### **Community Facilities**

- 4.4.8 A review of the key community facilities within 1km of the Main Application Site (as defined in **Chapter 2** of the **ES [TR020001/APP/5.01]** has been undertaken, the following facilities have been identified within this boundary.

- 4.4.9 A number of education facilities are located within 1km of the Proposed Development including nurseries, kindergartens, primary and secondary schools. Additionally, there are several places of worship including Churches and Hindu Temples are located within 1km of the Proposed Development. Moreover, community centres, playgrounds and a library have also been identified within a 1km radius of the Order Limits. Further details of the locations of these facilities can be found in **Appendix A** of this document.

### ***Future Baseline***

- 4.4.10 Without the Proposed Development, there are likely changes to the future baseline conditions. The population in Luton has increased by 10.9% from 2011 to 2021, higher than the overall increase for England (6.6%). Similar trends are seen in Central Bedfordshire which has had a population increase of 15.7%. Other areas within the study area such as St Albans and North Hertfordshire have seen a smaller increase in population of 6.6% and 5.4% respectively (Ref. 45). According to the This is Luton 2021 publication (Ref. 46) a 5% decrease in the population is expected in Luton over the next 15 years although there is a degree of uncertainty around this trajectory). The publication highlights that the older population will have the fastest rate of growth.
- 4.4.11 From the perspective of the EqlA, whilst the local population may grow and there may be changes to the socio-demographic makeup of the communities within the study area, it is likely that this would not cause material change to the conclusions of this assessment as disproportionate and differential effects would still occur.

### **Green Horizons Park**

- 4.4.12 The land on which the Proposed Development would be constructed overlaps with the proposed Green Horizons Park planning consent (formerly New Century Park, planning application ref. 17/02300/EIA) which was granted planning permission on 29 June 2021 following the signing of the Section 106 agreement. The Green Horizons Park development incorporates business, commercial, light industrial units, an access road, and improvements to WVP.
- 4.4.13 The Proposed Development supersedes much of the development consented at Green Horizons Park although the improvements to WVP would continue to be delivered through the Green Horizons Park planning consent. This includes a number of improvements to the northern part of the park, including:
- a. a refurbished Wigmore Pavilion;

- b. new junior and senior play areas; and
- c. a new skate park.

4.4.14 These improvements are expected to be implemented prior to construction of the Proposed Development commencing and are therefore part of the future baseline for assessing WVP. They will be retained as part of the Proposed Development.

4.4.15 The proposed provision of replacement open space consented through the Green Horizons Park planning consent will no longer be provided and would instead be excavated and occupied by works consented through the DCO. Replacement open space is provided as part of the Proposed Development to the east of the existing greenspace at WVP and this would be implemented in assessment Phase 1, as described in **Chapter 4** of the **ES [TR020001/APP/5.01]**. Further details of this are discussed in **Section 4.2**.

### Baseline Assessment Summary

4.4.16 **Table 4.11** outlines a summary of the findings from the Baseline Assessment by Protected Characteristic Group as well as wider socio-demographic indicators that were considered.

Table 4.11: Summary of Baseline Assessment

Indicator	Summary of Findings
Sex	Luton has a higher concentration of females compared to other local authorities in the study area as well as regional and national averages.
Age	All local authorities in the study area have a higher proportion of children compared to the regional and national averages (except for North Hertfordshire). Most local authorities have a lower proportion of young people compared to the regional and national average (apart from Luton which is in line with the national average) and all local authorities in the study area have a lower proportion of older people compared to the regional and national averages.
Disability	Luton and North Hertfordshire see the highest proportion of people with limited long-term illness or disability although these are lower than national and regional averages. Luton has a higher proportion of adults with a learning disability and were receiving long-term support from the local authority compared to regional and national averages.
Gender Reassignment	There are no official statistics relating to gender reassignment and the UK Census currently only collects data relating to sex (gender assigned at birth).
Marriage and Civil Partnership	Most local authorities in the study area have a higher proportion of those who are married compared to the

Indicator	Summary of Findings
	national and regional averages (except for Luton which has a lower average). Those in a same sex civil partnership within the study area are broadly in line with national and regional averages.
Pregnancy and Maternity	Luton and Central Bedfordshire have higher number of births compared to other local authorities within the study area.
Religion and Belief	Christianity is the largest religious group across all local authorities in the study area, however Luton does have a significantly higher proportion of Muslims within its population compared to other local authorities within the study area.
Race	Most local authorities in the study area are predominately White with the exception of Luton which has a high proportion of individuals who are Indian, Pakistani, Bangladeshi or Black/ African/ Caribbean/ Black British.
Sexual Orientation	Based on 2018 estimates, 2.2% of the population in the East of England identify as gay, lesbian or bisexual, compared to the highest rate which is seen in London at 3.8%, and the English average of 2.7%
Deprivation	Overall, Luton is more deprived compared to neighbouring authorities of North Hertfordshire, Central Bedfordshire, and St Albans, all of which have significantly lower levels of deprivation.
Employment	The percentage of people who are economically active is lower in Luton (76%) than surrounding districts, the East of England (80.5%) and England as a whole (79.1%).
Skills and Employment	The national vocational qualifications (NVQ levels) (Ref. 47), shows that educational attainment is generally lower across Luton than found in surrounding areas, as well as nationally. In fact, 9.8% of those aged 16-64 in Luton have no qualifications, significantly higher than the national average of 6.6%.

## 5 STAKEHOLDER ENGAGEMENT/CONSULTATION

### 5.1 Community Consultation

- 5.1.1 In 2019 a community workshop was held to gain further information on how local community resources are used, and the concerns and aspirations of local communities. Representatives from local community groups were invited to attend an engagement event hosted at the Tokko Youth Space in Luton Town Centre in July 2019. The event was joint hosted by the teams producing the Health Assessment, Community Assessment, and EqIA.
- 5.1.2 The aims of the engagement session were as follows:
- To inform local community stakeholders on the approach taken to the Health and Community Assessment and EqIA and advise of how the Proposed Development may affect the groups that they represent;
  - To obtain feedback and other information from community stakeholders on how the airport in its current form affects community resources, community groups and health and wellbeing; and
  - To provide community stakeholders the opportunity to discuss concerns and potential impacts caused by the Proposed Development and opportunities to mitigate any identified impacts.
- 5.1.3 The session was attended by community stakeholders invited by the Health Assessment, Community Assessment and EqIA teams. Representatives from twelve groups attended, whilst a further eleven groups were invited but unable to attend. The event was open to members of the public. The community stakeholders who were invited and those who attended are shown in **Table 5.1**. Information and feedback provided during the session was recorded and has informed this assessment.

Table 5.1 Community Stakeholder groups who were invited and those who attended

Attendees	Invited but not in attendance
Team Beds & Luton (Active Luton)	Friends of Wigmore Park
Raynham Way Community Centre	Flying Start Children's Centres, LBC
Wigmore Church & Community Centre	POhWER
Luton Irish Forum	Citizens Advice Bureau, Luton
TOKKO Youth Centre	Council of Faiths
East-Europeans Rights Organization in UK - C.I.C. (EU-RO.UK)	Grassroots (faith)
Near Neighbours	Our Mind Matters
Luton All Women's Centre	Polska Szkola Luton
Signposts	Bedfordshire Police



Attendees	Invited but not in attendance
People Directorate, Education, Support, Challenge and Intervention, Luton	
Farley Big Local (Age Concern)	
Disability Resource Centre	

## 5.2 Statutory Consultation 2019 and 2022

- 5.2.1 The aim of Statutory Consultation was to gather views from the local community, statutory consultees, the wider public and all those with an interest in the Proposed Development to inform the development of proposals. The first Statutory Consultation took place for a period of just over eight weeks, between 16 October 2019 and 16 December 2019. Consultees included Local Authorities, Prescribed Consultees and Persons with Interest in the Land.
- 5.2.2 To ensure that Statutory Consultation was inclusive and accessible to all, several communication channels were used including a dedicated website, phonenumber, project email address as well as consultation events. Thirty-five consultation events were hosted at locations in the community. These open exhibitions allowed members of the public to view the proposals, talk to members of the project team and complete feedback forms. The event venues were primarily chosen on the basis of their suitability as a community facility, their proximity to potentially affected communities, provision of disabled access and their availability.
- 5.2.3 Notification of the consultation was circulated using newspapers, emails, public advertising and newsletters. Newsletters sent to both households under the flight paths as well as people living within 1km of community consultation venues. Newsletters were also sent to local libraries, community centres, and places of worship as well as contacts identified that work with or can reach out to hard-to-reach groups.
- 5.2.4 Hard to reach groups, including young people, working families, people with disabilities as well as minority groups were contacted through specific means, following advice received from host local authorities. This included measures such as the distribution of poster packs to schools to facilitate advertising the consultation to students and pupils and the hosting of consultation events on weekdays and weekends, allowing working families the opportunity to participate in the consultation. The selection of consultation events, based on their level of access and location, was also informed by the needs of particular hard-to-reach groups, including people with disabilities and minority groups.
- 5.2.5 Feedback from the consultation focused on the need for the EIA to refer to the EqlA, the need for more publicly available information on the EqlA and for the two assessments to be more closely aligned, where appropriate. This has been taken into consideration and the EqlA now has reference to various documents in the ES and the wider application documents.



- 5.2.6 Further engagement activities were undertaken with local authorities where the Proposed Development would be located. These include Luton Borough Council, North Hertfordshire District Council and Central Bedfordshire Council. The engagement meetings were arranged to gain a deeper understanding of the equalities baseline assessment and to establish whether there were any key equalities issues that would need to be considered within this assessment. The list below summarises the discussion points for each meeting:
- a. relationship to the EIA process and topic interfaces;
  - b. overview of EqIA methodological approach and receptors identified;
  - c. input from Council on approach, baseline, and receptors identified; and
  - d. consideration of local equalities issues or additional information required.
- 5.2.7 Taking into account the feedback gained from the 2019 consultation, the EqIA was updated and a Draft EqIA was published online and made available for the Statutory Consultation undertaken in 2022. This was undertaken between February and April 2022. Feedback received through the consultation from a range of stakeholders has been taken into consideration within this EqIA being submitted as part of the application for development consent.
- 5.2.8 Further details on consultation feedback and the responses to address these comments are provided in the **Consultation Report [TR020001/APP/6.01]** and **[TR020001/APP/6.02]** submitted as part of the application for development consent.

## 6 SCREENING OF POTENTIAL EQUALITY EFFECTS

6.1.1 **Table 6.1** shows the results of a screening assessment to identify people in the area who could potentially be affected by the proposals, including different protected groups.

Table 6.1: Equalities Impact Assessment Screening

Questions considered to establish impacts from the outset for new or changing policies/practices	Sex	Religion or Belief	Age	Disability	Race	Sexual Orientation	Gender Re-assignment	Pregnancy & Maternity	Marriage & Civil Partnership
1: Is there any indication or evidence that different groups have different needs, experiences, issues or priorities in relation to the programme?	✓ Yes	✓ Yes	✓ Yes	✓ Yes	✓ Yes	× No	✓ Yes	✓ Yes	× No
2: Is there evidence or an indication of higher or lower uptake by different groups?	✓ Yes	✓ Yes	✓ Yes	✓ Yes	✓ Yes	× No	✓ Yes	✓ Yes	× No
3: Do people have different levels of access? Are there social or physical barriers to participation (e.g. language, format, physical access)?	✓ Yes	✓ Yes	✓ Yes	✓ Yes	✓ Yes	× No	✓ Yes	✓ Yes	× No
4: Is there an opportunity to advance equality or foster good relations by altering the programme?	✓ Yes	✓ Yes	✓ Yes	✓ Yes	✓ Yes	× No	✓ Yes	✓ Yes	× No
5: Is there an opportunity to advance equality or foster good relations by working or engaging with other organisations or the wider community?	✓ Yes	✓ Yes	✓ Yes	✓ Yes	✓ Yes	× No	✓ Yes	✓ Yes	× No

6.1.2 The screening assessment above has been based on professional judgement, development of the design and overview of potential impacts. No disproportionate and differential effects have been identified for those of a particular sexual orientation and those who are married or in a civil partnership. These PCGs have consequently been screened out of the EqIA.

## 7 ASSESSMENT OF DISPROPORTIONATE AND DIFFERENTIAL EFFECTS

7.1.1 The potential disproportionate and differential effects of the Proposed Development on groups with protected characteristics are presented in this section. The assessment has been based on a review of the ES [TR020001/APP/5.01], stakeholder engagement, and a review of local demographic data and relevant literature.

### 7.2 Age- children under 16

7.2.1 All local authorities within the study area have a higher proportion of children (aged 0 – 15) compared to the national average (see **Section 4** Baseline Assessment) (Ref. 48).

#### *Noise*

7.2.2 Both aircraft and road noise have been identified as having adverse effects on children, and as such, the noise impacts from construction and operations can disproportionately and differentially affect children (Ref. 49). Children can be vulnerable to noise impacts due to their less-developed maturity level and coping mechanisms. Children often spend more time at home compared to being at school and higher levels of noise during the night can be linked to sleep disturbances and sleep problems, which could in turn lead to behavioural issues.

7.2.3 The World Health Organisation also identifies children with dyslexia, hyperactivity or those taking toxic medication (medication with side-effects impacting hearing) as having particularly increased vulnerability to noise impacts (Ref.50).

7.2.4 No significant noise or vibration impacts are anticipated from construction of the Proposed Development across all assessment phases including construction traffic and therefore will not result in any differential or disproportionate effects on children under the age of 16. The effect on children under the age of 16 is **neutral**.

7.2.5 The noise assessment, reported in **Section 16.9 of Chapter 16** of the ES [TR020001/APP/5.01] states that during assessment Phase 1 and 2a operation, no significant noise effects due to change in noise as a result of the Proposed Development have been identified for operational air noise at residential properties. During assessment Phase 2b 3,100 residents would experience night-time noise increases that would result in moderate adverse effects, which are significant, these communities include areas around Luton Hoo Memorial Park, Someries, Southern parts of Beachwood Green, Lye Hill and isolated properties to the south of the A1081 on London Road, on Dane Steet, to the north of Bendish and between the airport and Stagenhoe Park. An increase in noise levels for the identified communities from air noise may have **adverse** differential or disproportionate effect on children under the age of 16.

- 7.2.6 During assessment Phase 1, two schools (Surrey St Primary and the Avenue Centre for Education) exceed noise level criteria as a result of air noise. During assessment Phase 2a two schools (the Avenue Centre for Education and Linden Academy) exceed noise level criteria, and for assessment Phase 2b, four schools (Surrey St Primary and the Avenue Centre for Education). However, all schools listed across all assessment phases were already above noise level criteria in the 2019 baseline. It is considered that all the schools will also be eligible for noise insulation which will improve internal acoustic conditions. Students with Special Educational Needs may be differentially effected from increases to noise levels due to increased sensitivity to changes in noise levels, however with the provision of additional insulation measures improving internal acoustic conditions from the existing scenario, this will result in a **neutral** effect on children under the age of 16.
- 7.2.7 No significant noise effects from ground noise during operation across all three assessment phases have been identified, therefore this will not result in any differential or disproportionate effects on children under the age of 16. The effect on children under the age of 16 is considered to be **neutral**.
- 7.2.8 In terms of surface access noise, findings from **Chapter 16** of the **ES [TR020001/APP/5.01]** findings show that there are no significant effects during assessment Phase 1 resulting in **neutral** effects on children under the age of 16. During assessment Phase 2a and Phase 2b there will be significant adverse effects approximately 55 properties in the vicinity of Crawley Green Road, either side of Wigmore Lane between Vauxhall Way and Hedley Rise as a result of traffic increases. An increase in noise levels from surface access noise may have **adverse** differential or disproportionate effects on children under the age of 16.
- 7.2.9 During assessment Phase 2b, residential properties on Stony Lane between The White Horse and Darley Road are expected to experience significant adverse effects as a result of increases in surface access noise. Noise barriers on this section of the road are not feasible due to engineering constraints however Stony Lane has been identified as an area for potential traffic management which could help with noise levels from increased traffic. An increase in noise levels from surface access noise may have **adverse** differential or disproportionate effects on children under the age of 16. The health assessment (**Chapter 13** of the **ES [TR020001/APP/5.01]**) identifies that the Proposed Development leads to an increase in Disability Adjusted Life Years (DALYs) lost as a result of aircraft noise which demonstrates the potential for the Proposed Development to increase sleep disturbance and annoyance. The assessment has identified an increase in adverse health outcomes attributable to the aircraft noise from the operation of the Proposed Development in all phases. Therefore, a moderate adverse permanent health effect is likely to occur, which is significant. Provision of additional compensatory measures in the form of noise insulation measures to qualifying properties could help reduce adverse health effects. This may have **adverse** differential or disproportionate effects on children under the age of 16.

### ***Air Quality***

- 7.2.10 Children are more susceptible to air quality changes than other groups (Ref. 51) (Ref. 52 ). For example, children living in areas of high air pollution have been found to be up to 33% more likely to have intellectual disabilities (Ref. 53). Air pollution is also linked with both the development and worsening of symptoms of respiratory conditions such as asthma (Ref. 54).
- 7.2.11 The air quality assessment (**Section 7.9 in Chapter 7 of the ES [TR020001/APP/5.01]**) found that during construction no significant effects are likely. Similarly, during operation no likely significant effects are forecast from the increase in road and air traffic. Additionally, the health assessment (**Chapter 13 of the ES [TR020001/APP/5.01]**) outlines that there are very small increases in mortality resulting from emissions associated with the operation of the Proposed Development. This results in a minor adverse effect on health, which is not significant. The results from the health assessment also show very small increases and decreases in hospital admissions for respiratory and cardiovascular disease resulting from changes in PM<sub>10</sub> exposure associated with the operation of the Proposed Development. The health effect is assessed as negligible.
- 7.2.12 As the changes in pollutant concentrations for NO<sub>2</sub>, PM<sub>10</sub> and PM<sub>2.5</sub> are negligible, no differential or disproportionate effects for children (aged 0-15) have been identified. Therefore, it is considered that there will be **neutral** effect for children under the age of 16 during construction and operation.

### ***Accessibility to PRowS and Open Space***

- 7.2.13 Accessibility to PRowS and public open space (such as Wigmore Valley Park) will be affected by the construction of the Proposed Development. This may have differential and disproportionate effects on children as they may be more likely to visit public open spaces and play spaces. Details of proposals at Wigmore Valley Park are outlined in **Section 4.2** of this report.
- 7.2.14 As it is proposed that the replacement open space will be provided prior to any earthworks taking place, there will be no differential or disproportionate effects on children (aged 0-15) from the loss of open space at Wigmore Valley Park, therefore resulting in a **neutral effect**.
- 7.2.15 As outlined in **Section 3.6** several footpaths will be impacted as a result of the construction of the Proposed Development, whilst mitigation for severed footpaths is provided the temporary disruption may result in **adverse** differential effects for children (aged 0-15).

### ***Community facilities***

- 7.2.16 Prospect House Day Nursery located on Prospect Way falls within the Order Limits and will be demolished due to the construction of the Proposed Development. The nursery caters for up to 114 young children aged between 3 months and 5 years and serves a catchment in the Luton and Harpenden area. The facility is currently rated 'Good' by OFSTED and is open all year round. The nursery caters for children from a diverse range of ethnic backgrounds with staff

speaking a variety of languages. It is located to the north east of the Main Application Site, an area which is currently characterised by light industrial and commercial airport uses.

- 7.2.17 The nursery would be demolished to allow for the construction of Airport Access Road (AAR) during assessment Phase 2a of the Proposed Development. The nearest alternative childcare facilities are Crawley Green & Wenlock Pre-School, Eaton Green Pre-School, and Hart Hill Nursery School and Children's Centre. These are located approximately 700m, 762m and 1.22km away from Prospect House Day Nursery, respectively. However, these facilities only cater for children between the ages of two and four years old, and not those under two, and are only open during term. There are no spaces currently available at Crawley Green & Wenlock Pre-School.
- 7.2.18 The nearest comparable childcare facilities (in terms of age range and opening) are as follows:
- a. Kinder City nursery – this is located approximately 1.59km away and caters for children between the ages of zero and four years. It is open all year round. There are currently no available spaces at the nursery.
  - b. Ashcroft and Ramridge Community nursery – this is located approximately 1.66km away and caters for children between the ages of zero and four years old. It is open 48 weeks of the year and currently has available spaces.
  - c. Bright Eyes Nursery Ltd – this is located approximately 1.95km away and caters for children between the ages of zero and four years. It is open 47 weeks of the year. It is not known whether the nursery has available spaces.
  - d. Oak Tree Kindergarten (Ashcroft Road) – this is located approximately 1.5km away and caters for children between the ages of one and four years. It is open all year round. It is not known whether the nursery has available spaces.
- 7.2.19 The applicant is continuing to engage with the owners and operators of Prospect House Day Nursery to identify reasonably practicable measures to help mitigate these potential adverse disproportionate effects. The property is not anticipated to be demolished until assessment Phase 2a, therefore after 2032. A potential alternative property has been identified in close proximity to the existing site and the Applicant has committed to ongoing engagement to ensure that alternative facilities are provided, agreements are in place, with adequate prior notice, to accommodate these services prior to the existing building being required for the Proposed Development. The current operator of the nursery has not raised objection to this timeline and does not require formal agreement at this early stage, given the time available within the existing lease and new premises being required. A further assessment to confirm replacement capacity requirements will be conducted closer to the time of closure. This commitment will be secured via a section 106 agreement as described in **Paragraph 6.8** of the **Planning Statement** submitted as part of the application for development consent [TR020001/APP/7.01].



- 7.2.20 These positive negotiations will continue, and it is anticipated that suitable agreement will be reached between the nursery and the Applicant which would result in the effect reducing to neutral.

### 7.3 Age – young people (16-24)

- 7.3.1 Luton has a higher proportion of young people compared to the regional average, all other local authorities in the study area have a lower proportion of young people compared to the regional and national average (see **Section 4** Baseline Assessment)(Ref. 37).

#### *Accessibility to PRowS and Open Space*

- 7.3.2 Young people are more likely to depend on public open space for leisure as a freely available resource. During construction of the Proposed Development, permanent land take at Wigmore Valley Park will be required. However, it is proposed that replacement open space would be delivered in assessment Phase 1 prior to any earthworks taking place and will be accessible throughout the construction of the Proposed Development. Key routes to Wigmore Valley Park would remain accessible through construction and the replacement open space will provide a space for leisure and exercise, in addition to providing facilities like a skate park.
- 7.3.3 Therefore, it is considered that there would be no differential or disproportionate effects on young people because of the loss of open space at Wigmore Valley Park resulting in a **neutral effect**.

#### *Employment Opportunities*

- 7.3.4 There is the opportunity for the surrounding areas' young population to benefit from any employment opportunities generated by the construction and operation of the Proposed Development. The **ETS [TR020001/APP/7.05]** highlights the need ensure that existing and potential employment opportunities are accessible for all groups. The ETS sets out several goals which promote inclusivity and diversity, these comprise Goal 3: Be an accessible place to work and Goal 4: Be an inclusive and values-driven place to work. The ETS further outlines several initiatives including encouraging local employment and supporting vulnerable groups into employment.
- 7.3.5 To maximise any employment benefits, the **ETS [TR020001/APP/7.05]** provides consideration for employment and training opportunities to be provided locally with emphasis on opportunities for young people.
- 7.3.6 The creation of employment opportunities during construction and operation of the Proposed Development will result in **beneficial** differential and disproportionate effects for young people.
- 7.3.7 The Proposed Development may therefore have a **beneficial** differential effect on young people during construction and operation as a result of the employment opportunities.



## 7.4 Age – older people aged 65 and over

7.4.1 Elderly people have increased sensitivities to certain environmental impacts which need to be considered. All local authorities in the study area have lower proportions of older people compared to the regional and national averages ( See **Section 4** Baseline Assessment).

### *Noise*

7.4.2 Noise arising from the construction and operation of the Proposed Development may lead to differential effects on older people. Aircraft noise has been linked to an increase in heart problems in older people (Ref. 55) A study by the Harvard School of Public Health (HSPH) and Boston University School of Public Health (BUSPH) found that areas that have a 10% higher level of decibels of noise from aircraft were 3.5% higher admission rates for cardiovascular disease.

7.4.3 As outlined in **Paragraph 7.2.5** no significant noise effects have been identified for operational air noise for assessment Phase 1 and 2a; therefore, the effect on older people is **neutral** for assessment Phases 1 and 2a. **Paragraph 7.2.5** outlines moderate adverse air noise effects, which are significant, on residential properties within assessment Phase 2b which could lead to differential and disproportionate **adverse** effects on those over the age of 65.

7.4.4 The increase in traffic noise levels on a range of residential properties in assessment Phase 2a and 2b, discussed above in **Paragraph 7.2.8**, could have adverse differential and disproportionate effects for older people living in these areas. An increase in noise levels from surface access noise may have **adverse** differential and disproportionate effect on those over the age of 65.

7.4.5 No significant noise effects from ground noise during operation across all three assessment phases have been identified, therefore this will not result in any differential or disproportionate effects on older people. The effect on older people is considered to be **neutral**.

7.4.6 The increase in traffic noise levels may impact on health and wellbeing of local communities, particularly older people. As outlined in **Paragraph 7.2.10** significant adverse health effects arising from increases in noise levels may result in **adverse** differential and disproportionate effects for older people living in these areas.

### *Air Quality*

7.4.7 Air quality changes may also result in differential effects on people due to their increased susceptibility to particulate matter (PM<sub>10</sub>) compared to the general population (Ref. 56). Higher levels of fine matter (PM<sub>2.5</sub>) have also been found to increase the risk of cardiovascular and respiratory diseases.

7.4.8 The air quality assessment (**Section 7.9** in **Chapter 7** of the **ES [TR020001/APP/5.01]** concluded that there are no likely significant effects during construction, as appropriate mitigation measures would be implemented. Similarly, during operation no likely significant effects are predicted from the increase in road and air traffic. The changes in pollutant concentrations for NO<sub>2</sub>, PM<sub>10</sub> and PM<sub>2.5</sub> are negligible. Therefore, no differential or disproportionate

effects on older people because of changes to air quality have been identified therefore resulting in a **neutral effect**.

- 7.4.9 Changes to air quality as a result of the Proposed Development may impact on the health and wellbeing of local communities, particularly older people. As outlined in **Paragraph 7.2.12** no significant health effects are expected to result from any changes in air quality, therefore the effect for older people living in these areas is **neutral**.

### ***Accessibility***

- 7.4.10 Older people can be differentially impacted due to changes in access to open space. During construction of the Proposed Development, permanent land take at Wigmore Valley Park will be required. However, replacement open space will be provided prior to earthworks commencing in assessment Phase 1. Therefore, no differential effects on older people have been identified about access to open space.
- 7.4.11 Accessibility to PRowWs will be partially affected during construction of the Proposed Development. This may have differential effects on older people as they may be more dependent on pedestrian routes or are more susceptible to mobility issues. The key routes that are impacted during construction are outlined in **Section 3.6** of this document.
- 7.4.12 Several footpaths will be impacted during construction of the Proposed Development, whilst impacted footpaths are restored or replaced the temporary disruption may result in adverse differential effects for older people. However, proposed changes to the PRowW network and the proposals for the replacement open space may improve the quality of the PRowW network and therefore could have **beneficial** differential effects during operation of the Proposed Development on older people who may have mobility issues.
- 7.4.13 Older people are also more sensitive to impacts arising from severance, which changes the nature of access to community facilities including health care facilities. Accessibility to these facilities may be affected by a change in traffic speeds or volume and or any diversions on the road network.
- 7.4.14 Measures are set out in the Outline Construction Traffic Management Plan (CTMP) (**Appendix 18.3** of the **ES [TR020001/APP/5.02]**) to ensure that the use of the primary route network for construction traffic routes will be maximised and will avoid where possible residential areas to the north of the airport. The Outline CTMP includes measures on the implementation of haul routes to limit the need to use public routes. The Outline CTMP also outlines that traffic management schemes will be implemented to reduce the likelihood of traffic diversions onto alternative routes, which would negatively impact upon the local community. The traffic management schemes will help to mitigate against any potential impacts on the local community and keep delays and disruptions to traffic to a reasonably practicable minimum.
- 7.4.15 Based on the above, it is considered that there will be no differential or disproportionate effects on older people because of severance due to increased construction traffic resulting in a **neutral effect**.

## 7.5 Disability

### *Accessibility*

- 7.5.1 During construction of the Proposed Development, permanent land take at Wigmore Valley Park will be required, further details on the loss of land are outlined in **Section 4.2** of this report. The replacement open space would be delivered in assessment Phase 1 prior to any earthworks taking place. Due to replacement open space being delivered prior to any construction work, no adverse differential or disproportionate effects on those with disabilities have been identified.
- 7.5.2 Upgraded connections to adjoining communities would offer improved access to open space especially for individuals with mobility issues resulting in **beneficial** differential effects.
- 7.5.3 During construction of the Proposed Development in assessment Phase 1 the Luton Staff Car Park would be demolished. Temporary car parking should be provided for those with disabilities during the construction of the Proposed Development to ensure employees with disabilities are able to travel to work, this will result in a **neutral effect** for staff who have disabilities. An alternative car park for employees would be accommodated on the site of the existing staff car park and car hire centre. Additional provision for airport employee parking would be made at a new Multi Storey Car Park at Parkway Road and a surface car park near Vauxhall Road. Staff car parks would have a designated number of disabled parking spaces and access from car parks to the airport will be made accessible for those with disabilities. As alternative car parking facilities will be provided during operation of the Proposed Development, there will be a **neutral effect** on staff who have disabilities.
- 7.5.4 Mobility issues for people with disabilities may affect their access to and from the airport as well as access within the new terminal. Mobility and accessibility considerations will need to be factored into the design of the Proposed Development to ensure that the airport is fully accessible to people with disabilities. The **Design Principles** document [TR020001/APP/7.09] outlines those considerations are factored into the design of the Proposed Development to ensure that the airport is providing equal access for all potential users. Initiatives to improve accessibility involve advocating transport and airport employers to ensure that public transport is accessible and affordable allowing those with disabilities to access the airport using these modes.
- 7.5.5 The **Design Principles** document [TR020001/APP/7.09] and **Surface Access Strategy** [TR020001/APP/7.12] outline the considerations for mobility and accessibility that have been factored into the design of the Proposed Development providing equal access for all potential users. This accounts for those with protected characteristics including ensuring that there are the appropriate number of lifts to allow step free access through the terminal, the taxi rank is in an adequate location to allow step free access to these services and that there is step-free access to bus stops and facilities. These interventions will improve accessibility to and from the Proposed Development

as well as within the new terminal therefore resulting in **beneficial** differential effects for those with physical disabilities as well as visual impairments.

### ***Employment opportunities***

- 7.5.6 There is a notable gap between the proportion of people with a disability or limiting long term illness and those that are in employment within Luton. The Proposed Development presents an opportunity to generate employment opportunities for people with disabilities in the local area. The **ETS [TR020001/APP/7.05]** highlights the need ensure that existing and potential employment opportunities are accessible for all groups. The ETS sets out several goals which promote inclusivity and diversity, these comprise Goal 3: Be an accessible place to work and Goal 4: Be an inclusive and values-driven place to work. The ETS further outlines several initiatives including encouraging local employment and supporting vulnerable groups into employment.
- 7.5.7 To maximise employment benefits, the needs of people with disabilities in supporting them into work is factored into the **ETS [TR020001/APP/7.05]** this gives consideration to employment and training opportunities to be provided locally with emphasis on opportunities for young people.
- 7.5.8 The creation of employment opportunities during construction and operation of the Proposed Development will result in **beneficial** differential and disproportionate effects for people with disabilities.
- 7.5.9 The **Design Principles** document **[TR020001/APP/7.09]** outlines those considerations which have been factored into the design of the Proposed Development to ensure that the airport is providing equal access for all potential users including creating an accessible workplace for current and future employees. Initiatives to improve accessibility involve advocating transport and airport employers to ensure that public transport is accessible and affordable including exploring solutions for areas with poor public transport access e.g. through car sharing solutions. Through these initiatives regarding access to the airport, particularly when accessing jobs, there would be differential **beneficial effects** for those with disabilities.

## **7.6 Gender Reassignment**

### ***Security***

- 7.6.1 The Proposed Development will need to ensure sufficient lighting and security in public spaces is included within the design of the new terminal and associated facilities. The **Design Principles [TR020001/APP/7.09]** for the Proposed Development set out the commitment to secure high quality placemaking objectives including the use of high-quality public realm materials, furniture and lighting during detailed design. This will help minimise security concerns and reduce incidents of crime. The lighting strategy (provided as part of Light Obtrusion Assessment, **Appendix 5.2** of the **ES [TR020001/APP/5.02]**) will be developed further at detailed design stage and will consider the safety and security of individuals undergoing gender reassignment. Overall, it is likely that the Proposed Development will have disproportionate and differential

**beneficial** effects on those who are transgender or who are undergoing gender reassignment.

### ***Accessibility***

- 7.6.2 The **Design Principles** document [TR020001/APP/7.09] acknowledges the commitment for the design of the Proposed Development to account for PCGs. Access to gender neutral toilets is a consideration for those who are transgender or people undergoing gender reassignment. The **Design Principles** document [TR020001/APP/7.09] acknowledges the need to provide gender neutral toilets. This will be further explored through the detailed design of the new terminal and associated facilities, including facilities for employees e.g. changing rooms. With the commitment to include the provision of appropriate facilities for those who are transgender or are undergoing gender reassignment the Proposed Development would result in disproportionate and differential **beneficial** effects for these individuals through better access to facilities.

## **7.7 Pregnancy and Maternity**

### ***Noise***

- 7.7.1 The World Health Organisation have identified that babies, individuals who are pregnant, and foetuses are particularly vulnerable to high noise exposure which may arise from construction and operation (Ref. 57). Little is known about the effects of non-occupational noise on foetal development. Noise effects can lead to sleep disturbances amongst pre-term and full-term babies and possibly hearing impairment (Ref. 58).
- 7.7.2 The noise assessment (**Chapter 16** of the **ES [TR020001/APP/5.01]**) states that during operation, residential areas close to the airport will not experience an increase in air traffic noise level. The health assessment (**Chapter 13** of the **ES [TR020001/APP/5.01]**) identified permanent, moderate adverse health effects. Those who are pregnant (including women, trans men and non binary people) who reside in these areas may be more susceptible to changes in noise levels. Based on outcomes from the noise and health assessments it is likely that as a result of increases in air travel noise there would be **adverse** differential effects for pregnant individuals.

### ***Community Facilities***

- 7.7.3 The current situation describing the loss and replacement of Prospect House Day Nursery is described in **Paragraphs 7.2.16** to **7.2.20** of this assessment.
- 7.7.4 The location of the nursery in close proximity to the airport influences the attractiveness and ability to fulfil some local and on-site job opportunities. This could be impacted due to the demolition of the nursery and may result in adverse differential effects on parents who work at the airport. The Applicant is currently in negotiations with the nursery, positive negotiations will continue, and it is anticipated that suitable agreement will be reached between the nursery and the Applicant which would result in the effect reducing to neutral.



## ***Accessibility***

- 7.7.5 The Proposed Development may result in differential effects on individuals who are pregnant and parents with small children due to changes in accessibility to community resources (Ref. 59) (Ref. 60) (Ref. 61). This may arise during construction due to road or footpath closures or increases in construction traffic, causing severance.
- 7.7.6 Pregnant individuals and parents can be differentially affected due to changes in access to open space. During construction of the Proposed Development, permanent land take at Wigmore Valley Park will be required. However, replacement open space will be provided prior to earthworks commencing in assessment Phase 1. As a result, it is considered that there would be no differential or disproportionate effects on those who are pregnant (including women, trans men and non-binary people) and parents with regards to accessing the open space resulting in a **neutral effect**.
- 7.7.7 Accessibility to PRoWs will be partially affected during construction of the Proposed Development. This may result in adverse differential effects for pregnant individuals and parents as they may be more dependent on pedestrian routes or have mobility issues, especially if parents are walking with pushchairs. The key routes that are impacted during construction are outlined in **Section 3.6** of this report. Several footpaths will be impacted as a result of the construction of the Proposed Development and whilst mitigation for severed footpaths is proposed to be provided, the temporary disruption may still result in **adverse** differential effects for those who are pregnant (including women, trans men and non-binary people) or parents with pushchairs.
- 7.7.8 Accessibility to community facilities may be affected by severance caused by a change in traffic speeds and volume due to construction traffic vehicles gaining access to the Proposed Development. As outlined in **Paragraph 7.4.12** traffic management schemes would help to mitigate against any potential impacts on the local community and keep delays and disruptions to traffic to a reasonably practicable minimum. It is considered that there will be no differential or disproportionate effects on pregnant women and parents because of severance due to increased construction traffic resulting in a **neutral effect**.

## **7.8 Race**

- 7.8.1 Luton has a diverse population, with approximately 40% of the population being from BME backgrounds (see baseline assessment, **Section 4** of this EqIA). The population of Luton is 59.6% white which is much lower compared to the national average of 86.2%. The stakeholder engagement undertaken with local authorities found that migrants from BME groups were experiencing difficulties in finding work and accommodation, with some recent migrants resorting to temporarily sleeping at the airport.

### ***Noise and air quality***

- 7.8.2 Research indicates that some ethnic groups may be more susceptible to health issues such as cardiovascular disease and other long-term health issues. For example, Pakistani, Bangladeshi, and Black-Caribbean people reported the

poorest level of health when compared to other ethnic groups, and Pakistani women and Bangladeshi men were more likely to report long term health issues (Ref.62). The higher concentration of these groups in Luton may mean that some members of the community may have increased sensitivities to air quality or noise effects arising from the construction or operation of the Proposed Development.

- 7.8.3 As outlined in **Paragraph 7.2.5** no significant noise effects have been identified for operational air noise across for assessment Phase 1 and 2a. The effect on BME groups is **neutral** for assessment Phases 1 and 2a. **Paragraph 7.2.5** outlines that **Chapter 16** within the **ES [TR020001/APP/5.01]** concludes moderate adverse air noise effects, which are significant, on residential properties within assessment Phase 2b which could lead to differential and disproportionate **adverse** effects on BME.
- 7.8.4 The increase in traffic noise levels on a range of residential properties in assessment Phase 2a and 2b, discussed above in **Paragraph 7.2.8**, could have adverse differential and disproportionate effects for older people living in these areas. An increase in noise levels from surface access noise may have **adverse** differential and disproportionate effect on BME groups.
- 7.8.5 No significant noise effects from ground noise during operation across all three assessment phases have been identified, therefore this will not result in any differential or disproportionate effects on those from ethnic minorities. The effect on those from BME backgrounds is **neutral**.
- 7.8.6 The increase in traffic noise levels may impact on health and wellbeing of local communities, particularly older people. As outlined in **Paragraph 7.2.10** significant adverse health effects rising from increases in noise levels may result in **adverse** differential effects for those from ethnic minorities.
- 7.8.7 The air quality assessment (**Chapter 7** of the **ES [TR020001/APP/5.01]**) found that during construction no significant effects are likely to occur, as appropriate mitigation measures will be followed. Similarly, during operation no likely significant effects are assessed from the increase in road and air traffic. The changes in pollutant concentrations for NO<sub>2</sub>, PM<sub>10</sub> and PM<sub>2.5</sub> are considered to be negligible. As outlined in **Paragraph 7.2.12** no significant health effects are expected to result from any changes in air quality; therefore, no differential or disproportionate effects on individuals belonging to certain ethnic groups because of changes to air quality have been identified resulting in a **neutral effect**.

### ***Accessibility***

- 7.8.8 Accessibility to community facilities may be affected by severance caused by a change in traffic speeds and/or volume.
- 7.8.9 The Outline CTMP (**Appendix 18.3** of the **ES [TR020001/APP/5.02]**) sets out measures to limit the effects of severance on local communities resulting from construction traffic. Measures that are proposed ensure that the use of the Primary Route Network for construction traffic routes will be minimised and will avoid where possible residential areas to the north of the airport. The Outline

CTMP includes measures on the implementation of haul routes will set to limit the need to use public routes. The Outline CTMP also outlines the traffic management schemes will be implemented to reduce the likelihood of traffic diversions onto alternative routes, which would keep delays and disruptions to traffic to a reasonably practicable minimum.

- 7.8.10 The **Design Principles** document [TR020001/APP/7.09] ensures that the design accounts for those with protected characteristics. Many people from ethnic minorities may not speak English as a first language and therefore, as detailed design progresses considerations should be made to ensure that signage and information within the airport is available in a range of different languages to ensure all individuals have access to the relevant information and have the appropriate means of wayfinding.
- 7.8.11 Considering the proposed measures set out above it is considered that there will be no differential or disproportionate effects on any ethnic groups because of severance due to increased construction traffic resulting in a **neutral** effect.

### ***Employment opportunities***

- 7.8.12 The employment generated during the construction and operation of the Proposed Development creates an opportunity to benefit people from BME groups. The unemployment rate nationally has been found to be highest for Black people (12%), followed by people from a Bangladeshi (10%), Pakistani (10%) or other Asian (10%) or multiple/mixed (10%) ethnic background (Ref.63), Luton has a high proportion of these groups.
- 7.8.13 To maximise any employment benefits, the **ETS** [TR020001/APP/7.05] considers maximising opportunities for employment and training to be provided locally with the emphasis on opportunities for people from BME groups. The **ETS** outlines the need to create an inclusive workplace and ensure employment opportunities are made available to those from BME groups. The **ETS** sets out several goals which promote inclusivity and diversity, these comprise Goal 3: Be an accessible place to work and Goal 4: Be an inclusive and values-driven place to work. The **ETS** further outlines several initiatives including encouraging local employment and supporting vulnerable groups into employment.
- 7.8.14 During operation, the airport operator should consider opportunities to ensure training and employment supports local people from BAME groups. As described in the **ETS**, the Airport Employer Community Forum will help foster diversity and inclusion within the workplace and seek to understand barriers to employment especially for underrepresented groups.

## **7.9 Religion or Belief**

- 7.9.1 Luton has a large proportion of Muslims, which make up 24.6% of the population, this is higher than the regional and national averages. Similarly, there are also higher than average proportions of residents who identify as Hindu (3.3%) and Sikh (1.2%).



## ***Accessibility***

- 7.9.2 Accessibility to community or religious facilities may be affected by severance caused by a change in traffic speeds and/or volume.
- 7.9.3 The Outline CTMP (**Appendix 18.3** of the **ES [TR020001/APP/5.02]**) sets out measures to limit the effects of severance on local communities resulting from construction traffic. Measures should ensure that the use of the primary route network for construction traffic routes will be minimised and will avoid where possible residential areas to the north of the airport. The Outline CTMP also includes measures on the implementation of haul routes to limit the need to use public routes. The Outline CTMP also outlines that traffic management schemes will be implemented to reduce the likelihood of traffic diversions onto alternative routes and will keep delays and disruptions to traffic to a reasonably practicable minimum so that local communities are not negatively impacted.
- 7.9.4 Considering the proposed measures set out above it is considered that there will be no differential or disproportionate effects on any religious groups because of severance due to increased construction traffic resulting in a **neutral** effect.
- 7.9.5 All religious groups and beliefs should have access to the appropriate prayer facilities and wider facilities within the airport. These should be accessible 24 hours a day and 7 days a week to ensure that all individuals always have access. The **Design Principles** document [**TR020001/APP/7.09**] acknowledges the need to provide adequate space for prayer rooms as well as faith and culture aware provision of eating facilities. Elements associated with prayer rooms and eating facilities will be considered within the detailed design stage and will seek mitigate where possible any adverse differential or disproportionate impacts against religious groups or beliefs.

## **7.10 Sex**

### ***Employment opportunities***

- 7.10.1 The proportion of women in employment in Luton is lower than regional and national averages) while the proportion who are economically inactive is higher than regional and national averages (see baseline),). Therefore, women may benefit from any additional employment generated from the construction or operation of the Proposed Development.
- 7.10.2 To maximise any employment benefits, the **ETS [TR020001/APP/7.05]** considers maximising opportunities for employment and training to be provided locally with the emphasis on opportunities to be provided locally with emphasis on women seeking to return to work. The **ETS** outlines the need to create an inclusive workplace and ensure employment opportunities are made available. The **ETS** sets out several goals which promote inclusivity and diversity, these comprise Goal 3: Be an accessible place to work and Goal 4: Be an inclusive and values-driven place to work. The **ETS** further outlines several initiatives including encouraging local employment and supporting vulnerable groups into employment.

- 7.10.3 During operation, the airport operator should also consider opportunities to ensure training and employment support local women returning to work.

### **Security**

- 7.10.4 According to a survey by charity Plan International UK, 66% of young women have experienced harassment in a public place (Ref. 64) Furthermore, women are more likely to feel concerned about security (Ref. 65) Adequate lighting and security at the Proposed Development would therefore help to appease any security concerns and reduce incidents of crime. The **Design Principles [TR020001/APP/7.09]** for the Proposed Development set out the commitment to secure high quality placemaking objectives including the use of high quality public realm materials, furniture and lighting during detailed design. This will help to appease any security concerns and reduce incidents of crime. The lighting strategy (provided as part of Light Obtrusion Assessment, **Appendix 5.2** of the **ES [TR020001/APP/5.02]**) will be developed further at detailed design stage and will consider the safety and security of women to ensure that there are no disproportionate or differential effects on women due to a lack of safety and security.

## **7.11 Topics Scoped Out**

- 7.11.1 Disproportionate and differential effects on people that are married or in a civil partnership, and on sexual orientation have not been identified as part of this assessment. These protected characteristics have consequently been scoped out of the EqIA during the initial screening assessment. Further details on the screening assessment can be found in **Section 6**.

## 8 IN-COMBINATION CLIMATE CHANGE IMPACTS ON GROUPS WITH PROTECTED CHARACTERISTICS

8.1.1 **Chapter 9** Climate Change Resilience of the **ES [TR020001/APP/5.01]** discusses the in-combination climate change impacts and identifies changes and effects across relevant receptors. It is found that:

*“Climate change exacerbates the effect the Proposed Development has on health and community, particularly in relation to increased summer temperatures and flooding.”* This could have disproportionate or differential effects on groups with protected characteristics, especially children, older people, certain BAME groups, and those with disabilities.

8.1.2 No significant in-combination climate change impacts have been identified and therefore no differential or disproportionate effects on PCGs have been identified resulting in a **neutral** effect.

## 9 CUMULATIVE EFFECTS

- 9.1.1 As reported in **Chapter 21** In-Combination and cumulative effects of the **ES [TR020001/APP/5.01]**, Cumulative effects are impacts that may occur due to the 'cumulation' of environmental effects from Proposed Development with environmental effects from 'other developments' (also referred to as inter-project effects).
- 9.1.2 There are no significant cumulative effects for air or noise quality that are relevant for this assessment. However, there are positive cumulative effects for employment, which are also likely to lead to **beneficial** differential and disproportionate effects for groups with protected characteristics, bringing employment opportunities to the local and surrounding area.

## 10 SUMMARY AND MITIGATION MEASURES

- 10.1.1 A summary of the impacts on people with protected characteristics and potential mitigation measures is provided in **Table 10.1**, which sets out the relevant protected characteristic groups, the disproportionate and differential effects that have been identified, the proposed mitigation measures and the assessment of beneficial, neutral, or adverse effects on a protected characteristic group.

Table 10.1 Summary and Mitigation

Protected Characteristic	Disproportional and/or Differential Effects	Proposed Mitigation measures	Potential residual beneficial, neutral, or adverse effect
Age – Children under 16	Noise changes from operation may differentially affect children. Children can be vulnerable to noise impacts due to their less-developed maturity level and coping mechanisms. An increase in noise levels from surface access noise may have adverse differential impact on children. No other differential or disproportionate effects on children have been identified.	Proposed mitigation measures for adverse noise impacts are set out in <b>Chapter 13</b> Health and Communities and <b>Chapter 16</b> Noise and Vibration of the <b>ES [TR020001/APP/5.01]</b> .	Neutral/ Adverse dependent on location
	Air pollution is linked with the development of respiratory conditions such as asthma. This may differentially or disproportionately affect children as their respiratory system is still developing, increasing their vulnerability to the effects of air pollution. No differential or disproportionate effects on children have been identified.	Proposed mitigation measures for air quality are set out <b>Chapter 7</b> Air Quality of the <b>ES [TR020001/APP/5.01]</b> . Monitoring of the air quality impacts to ensure no significant effects on air quality.	Neutral, as no significant effects have been identified in the Air Quality assessment.
	Accessibility to public open space (Wigmore Valley Park) will not be affected during construction, as replacement parkland will be provided, prior to any earthworks being undertaken in assessment Phase 1. No differential or disproportionate effects on children have been identified.	During construction, replacement open space will be provided prior to construction works commencing seek to ensure access remains for areas of public open space (Wigmore Valley Park).	Construction – neutral Operation – beneficial

Protected Characteristic	Disproportional and/or Differential Effects	Proposed Mitigation measures	Potential residual beneficial, neutral, or adverse effect
		<p>During operations, park will be relocated to the east. The needs of children should be taken into consideration in the designs for the new park.</p>	
	<p>Accessibility to PRowS may be affected during construction. This would differentially effect children as they are more dependent on pedestrian/cycle modes of transport. Temporary diversion will be put in place where required and access to PRowS will remain, but disruptions may cause adverse differential effects on children during construction.</p> <p>Improvements to PRowS will be delivered as part of the Proposed Development, particularly within Wigmore Valley Park resulting in beneficial differential effects during operation.</p>	<p>Proposed mitigation measures should ensure that key routes for residents are likely to remain accessible through construction to avoid disruption for users.</p>	<p>Construction –adverse Operation – beneficial</p>
	<p>The demolition of the Prospect House Day Nursery will result in disproportionate effects on children (aged 3 months -5 years).</p>	<p>The Applicant is committed to provide suitable alternative arrangements and continuing to engage with the operators of Prospect House Day Nursery. Potential alternative premises have been identified in close proximity to the existing site. Property is not</p>	<p>Neutral due to additional mitigation measure being implemented.</p>

Protected Characteristic	Disproportional and/or Differential Effects	Proposed Mitigation measures	Potential residual beneficial, neutral, or adverse effect
		<p>impacted until assessment Phase 2a (after 2032). Agreement is anticipated to be confirmed with sufficient lead in time to allow provision prior to current facilities being required for the Proposed Development.</p>	
<p>Age – Young people (16 – 24)</p>	<p>Young people are more likely to depend on public open space for leisure as a freely available resource. Accessibility to public open space (Wigmore Valley Park) will not be affected during construction, as replacement parkland will be provided, prior to any earthworks being undertaken in assessment Phase 1. No disproportionate or differential effects have been identified during construction. Replacement parkland will result in beneficial differential effects on young people during operation.</p>	<p>During construction, replacement open space will be provided prior to construction works commencing During construction, ensure access remains for areas of public open space (Wigmore Valley Park). During operations, park will be relocated to the east. The needs of young people should be taken into consideration in the designs for the new park.</p>	<p>Construction – neutral Operation – beneficial</p>
	<p>There is the opportunity for the surrounding areas' young population to benefit from any employment opportunities generated by the construction and</p>	<p>Consider these protected groups in the <b>ETS [TR020001/APP/7.05]</b>.</p>	<p>Construction – beneficial</p>



Protected Characteristic	Disproportional and/or Differential Effects	Proposed Mitigation measures	Potential residual beneficial, neutral, or adverse effect
	operation of the Proposed Development. Employment opportunities arising from construction and / or operation of expanded airport will result in beneficial differential effects on young people during construction and operation.	The ETS outlines specifics that the source of employment and training opportunities should occur locally where possible with emphasis on opportunities for young people.	Operations – beneficial
Age – Older people (65+)	Aircraft noise has been linked to an increase in heart problems in older people. Noise changes due to construction or operation may differentially affect older people.	Proposed mitigation measures for adverse noise impacts are set out in <b>Chapter 13</b> and <b>Chapter 16</b> of the <b>ES [TR020001/APP/5.01]</b> .	Neutral/ Adverse dependent on location
	Air quality changes may also differentially affect older people due to their increased susceptibility to particulate matter (PM10). Air quality changes may differentially affect older people.	Proposed mitigation measures for air quality are set out <b>Chapter 7</b> of the <b>ES [TR020001/APP/5.01]</b> . Monitoring of the air quality impacts should be put in place to ensure no significant effects on air quality outlined in <b>Chapter 7</b> of the <b>ES [TR020001/APP/5.01]</b> .	Neutral, as no significant effects have been identified within the Air Quality assessment.
	Accessibility to public open space (Wigmore Valley Park) will not be affected during construction, as	During construction, replacement open space	Construction – neutral

Protected Characteristic	Disproportional and/or Differential Effects	Proposed Mitigation measures	Potential residual beneficial, neutral, or adverse effect
	<p>replacement parkland will be provided, prior to any earthworks being undertaken in assessment Phase 1. No disproportionate or differential effects have been identified during construction. Replacement parkland will result in beneficial differential effects on older people during operation.</p>	<p>will be provided prior to construction works commencing.</p> <p>During construction, ensure access remains for areas of public open space (Wigmore Valley Park).</p> <p>During operations, park will be relocated to the east. The needs of older people should be taken into consideration in the designs for the new park.</p>	<p>Operations – beneficial</p>
	<p>Accessibility to PROW would be affected during construction. This would differentially affect older people as they are more dependent on accessible pedestrian modes of transport. Temporary diversion will be put in place where required and access to PROW will remain. However, the temporary disruptions may have differential adverse effects on older people during construction.</p> <p>Improvements to PROW will be delivered as part of the Proposed Development, particularly within Wigmore Valley Park resulting in beneficial differential effects during operation.</p>	<p>Proposed mitigation measures should ensure that key routes for residents are likely to remain accessible through construction to avoid disruption for users.</p>	<p>Construction –adverse Operations – beneficial</p>
	<p>Older people are also more sensitive to impacts arising from severance, which changes the nature of access to</p>	<p>Traffic management measures to be adopted</p>	<p>Neutral</p>

Protected Characteristic	Disproportional and/or Differential Effects	Proposed Mitigation measures	Potential residual beneficial, neutral, or adverse effect
	<p>community facilities including health care facilities. Accessibility to community facilities will not be affected by severance caused by a change in traffic speeds or volume. No disproportionate or differential effects have been identified.</p>	<p>during construction have been set out in the Outline CTMP (<b>Appendix 18.3</b> of the <b>ES [TR020001/APP/5.02]</b>. and will should seek to ensure that there are no impacts on local communities from construction traffic are limited.</p>	
Disability	<p>Accessibility to public open space (Wigmore Valley Park) will not be affected during construction, as replacement parkland will be provided, prior to any earthworks being undertaken in assessment Phase 1. No disproportionate or differential effects have been identified during construction. Replacement parkland will result in beneficial differential effects on those with disabilities during operation.</p>	<p>During construction, replacement open space will be provided prior to construction works commencing. During construction, ensure access remains for areas of public open space (Wigmore Valley Park). During operations, park will be relocated to the east. The needs of those with disabilities should be taken into consideration in the designs for the new park.</p>	<p>Construction – neutral Operation – beneficial</p>

Protected Characteristic	Disproportional and/or Differential Effects	Proposed Mitigation measures	Potential residual beneficial, neutral, or adverse effect
	<p>Accessibility to PROWs would be affected during construction. This would differentially affect those with disabilities as they are more dependent on accessible pedestrian modes of transport. Temporary diversion will be put in place where required and access to PROWs will remain. However, the temporary disruptions may still result in differential adverse effects on those with disabilities during construction.</p> <p>Improvements to PROWs will be delivered as part of the Proposed Development, particularly within Wigmore Valley Park resulting in beneficial differential effects during operation.</p>	<p>Proposed mitigation measures should ensure that key routes for residents are likely to remain accessible through construction to avoid disruption for users.</p>	<p>Construction – adverse Operation – beneficial</p>
	<p>Mobility issues for people with disabilities may affect their access to and from the airport as well as access within the new terminal. No disproportionate or differential effects have been identified. Mobility and accessibility considerations will need to be factored into the design of the Proposed Development to ensure that the airport is fully accessible to people with disabilities.</p>	<p>Considerations have been factored into the <b>Design Principles</b> document [TR020001/APP/7.09] and <b>Surface Access Strategy</b> [TR020001/APP/7.12] and will be developed further at detailed design stage.</p>	<p>Neutral</p>
	<p>Those with disabilities require inclusive and accessible transport and access options to and from and within the Proposed Development.</p>	<p>Ensure that the need for accessible and inclusive facilities is factored into the designs of the new terminal and associated facilities.</p>	<p>Potential for either/both adverse and beneficial. Beneficial if the proposed mitigation</p>

Protected Characteristic	Disproportional and/or Differential Effects	Proposed Mitigation measures	Potential residual beneficial, neutral, or adverse effect
		<p>Accessibility for disabled people has been factored into surface access, <b>Design and Access Statement [TR020001/APP/7.03]</b> and Outline CTMP <b>Appendix 18.3 of the ES [TR020001/APP/5.02]</b>.</p>	<p>measures are implemented</p>
	<p>The Proposed Development presents an opportunity to generate employment opportunities for people with disabilities in the local area employment opportunities arising from construction and/or operation of expanded airport resulting in beneficial differential effects in construction and operation.</p>	<p>Consideration of these protected groups has been made in the CoCP (<b>Appendix 4.2 of the ES [TR020001/APP/5.02]</b>), and the <b>ETS [TR020001/APP/7.05]</b> notes that employment and training opportunities should be sourced locally where possible with emphasis on opportunities for those with disabilities.</p>	<p>Construction – beneficial Operation – beneficial</p>
<p>Gender Reassignment</p>	<p>Access to gender neutral toilets is a consideration for people undergoing gender reassignment. Improper access to toilet facilities could result in adverse differential effects.</p>	<p>The <b>Design Principles</b> document <b>[TR020001/APP/7.09]</b> states the needs for gender neutral toilet facilities is included within</p>	<p>Potential adverse. Neutral if the proposed mitigation measures are implemented</p>

Protected Characteristic	Disproportional and/or Differential Effects	Proposed Mitigation measures	Potential residual beneficial, neutral, or adverse effect
	Security considerations for those undergoing gender reassignment who may be more likely to be concerned about security in public spaces and could result in adverse differential effects.	the detailed design of the new terminal and associated facilities.  Construction and operation: ensure sufficient lighting and security in public spaces is included within the design of the new terminal and associated facilities.	Potential adverse. Neutral if the proposed mitigation measures are implemented
Marriage and Civil Partnership	Scoped out	Scoped out	Scoped out
Pregnancy and Maternity	The World Health Organisation have identified that babies, pregnant women, and fetuses are particularly vulnerable to high noise exposure which may arise from construction and operation and could result in adverse differential effects.  Accessibility to public open space (Wigmore Valley Park) will not be affected during construction, as replacement parkland will be provided, prior to any earthworks being undertaken in assessment Phase 1. No disproportionate or differential effects have been identified during construction. Replacement open space will result in beneficial differential effects on parents or pregnant women during operation.	Proposed mitigation measures for adverse noise impacts are set out in <b>Chapter 13</b> and <b>Chapter 16</b> of the <b>ES [TR020001/APP/5.01]</b>  During construction, replacement open space will be provided prior to construction works commencing. During construction, ensure access remains for areas of public open space (Wigmore Valley Park).	Neutral/ Adverse dependent on location.  Construction – neutral Operation – beneficial

Protected Characteristic	Disproportional and/or Differential Effects	Proposed Mitigation measures	Potential residual beneficial, neutral, or adverse effect
		<p>During operations, the park will be relocated to the east. The needs of parents should be taken into consideration in the designs for the new park.</p>	
	<p>Accessibility to PROWs would be affected during construction. This would differentially affect parents with pushchairs as they are more dependent on accessible pedestrian modes of transport. Temporary diversion would be put in place where required and access to PROWs would remain. However, disruptions to the PROW network may still result in differential adverse effects on parents with pushchairs during construction. Improvements to PROWs will be delivered as part of the Proposed Development, particularly within Wigmore Valley Park resulting in beneficial differential effects during operation.</p>	<p>Proposed mitigation measures should ensure that key routes for residents are likely to remain accessible through construction to avoid disruption for users.</p>	<p>Construction –adverse Operation – beneficial</p>
	<p>Pregnant women and parents are also more sensitive to impacts arising from severance, which changes the nature of access to community facilities including health care facilities. Accessibility to community facilities will not be affected by severance caused by a change in traffic speeds and/or volume. No disproportionate or differential effects have been identified.</p>	<p>Traffic management measures to be adopted during construction have been set out in the Outline CTMP and will should seek to ensure that there are no impacts on local communities from construction traffic are limited.</p>	<p>Neutral</p>



Protected Characteristic	Disproportional and/or Differential Effects	Proposed Mitigation measures	Potential residual beneficial, neutral, or adverse effect
	<p>The demolition of the Prospect House Day Nursery could result in adverse disproportionate effects on parents with young.</p>	<p>The Applicant is committed to provide suitable alternative arrangements and continuing to engage with the operators of Prospect House Day Nursery. Potential alternative premises have been identified in close proximity to the existing site. Property is not impacted until assessment Phase 2a (after 2032). Agreement is anticipated to be confirmed with sufficient lead in time to allow provision prior to current facilities being required for the Proposed Development.</p>	<p>Neutral due to additional mitigation</p>
<p>Race</p>	<p>Research indicates that some ethnic groups may be more susceptible to health issues such as cardiovascular disease and other long-term health issues. Noise adversely differentially effects certain BME groups.</p>	<p>Proposed mitigation measures for adverse noise impacts are set out in <b>Chapter 13</b> and <b>Chapter 16</b> of the <b>ES [TR020001/APP/5.01]</b></p>	<p>Neutral/ Adverse dependent on location</p>

Protected Characteristic	Disproportional and/or Differential Effects	Proposed Mitigation measures	Potential residual beneficial, neutral, or adverse effect
	Air quality changes may result in adverse differentially effects on certain BME groups.	Proposed mitigation measures for air quality are set out <b>Chapter 7</b> of the <b>ES [TR020001/APP/5.01]</b> .	Neutral, as no significant effects have been identified.
	All individuals should have access to the relevant information and wayfinding within the airport. Individuals from ethnic minorities may not speak English as their first language and may not be able to access information within the airport.	As detailed design progresses considerations should be made to ensure that signage and information within the airport is available in a range of different languages	Neutral, as no significant effects have been identified.
	The employment generated during the construction and operation of the Proposed Development creates an opportunity to benefit people from BME groups. Employment opportunities arising from construction and/or operation of expanded airport will result in beneficial differential effects during construction and operation.	Consider these protected groups in the <b>ETS [TR020001/APP/7.05]</b> . The ETS specifies that the sourcing of employment and training opportunities should be done locally where possible with emphasis on opportunities for BAME groups.	Construction – beneficial Operations – beneficial
Religion or Belief	Accessibility to religious facilities will not be affected by severance caused by a change in traffic speeds and/or volume. No disproportionate of differential effects have been identified.	Proposed mitigation measures should ensure that key routes for residents are likely to remain accessible	Neutral

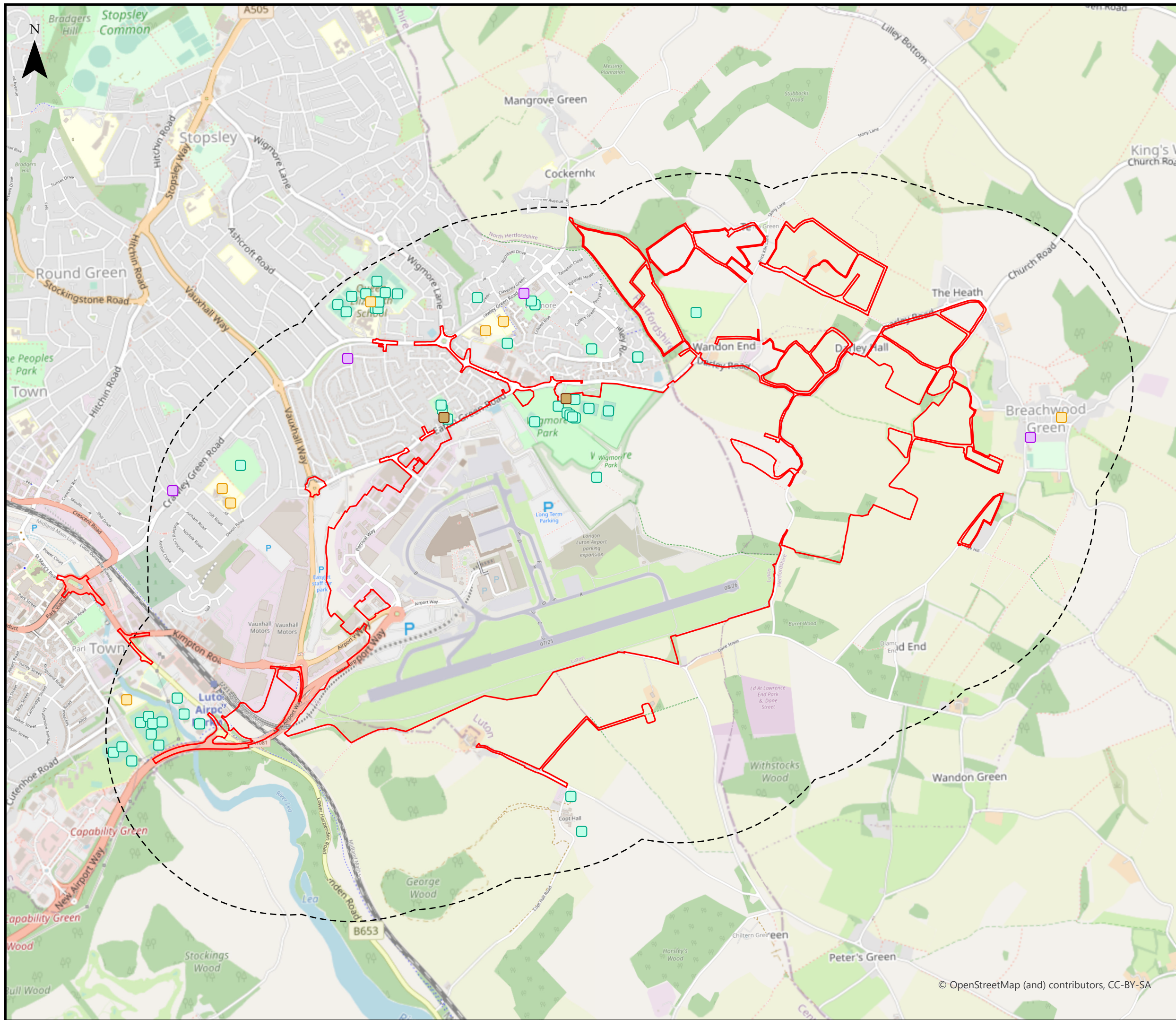
Protected Characteristic	Disproportional and/or Differential Effects	Proposed Mitigation measures	Potential residual beneficial, neutral, or adverse effect
		through construction to avoid disruption for users.	
	All religious groups and beliefs should have access to the appropriate prayer facilities within the airport. These should be accessible 24 hours a day and 7 days a week to ensure that all individuals have access at all times. Accessibility to prayer facilities in the new terminal building could result in adverse differential effects.	The <b>Design Principles</b> document [TR020001/APP/7.09] acknowledges that the consideration of needs of religious groups (e.g., prayer facility) is included within the design of the new terminal and associated facilities.	Potential adverse. Neutral if the proposed mitigation measures are implemented
Sex	Women more likely to be concerned about security, particularly at night and in public spaces, poor lighting and security could result in adverse differential effects	Construction and operation: ensure sufficient lighting and security in public spaces is included within the design of the new terminal and associated facilities.	Potential adverse. Neutral if the proposed mitigation measures are implemented
	Women may benefit from any additional employment generated from the construction or operation of the Proposed Development. Employment opportunities arising from construction and / or operation of expanded airport will result in beneficial differential effects.	Consider these protected groups in the <b>ETS</b> [TR020001/APP/7.05] which specifies the sourcing of employment and training opportunities locally where possible	Construction – beneficial Operations – beneficial

<b>Protected Characteristic</b>	<b>Disproportional and/or Differential Effects</b>	<b>Proposed Mitigation measures</b>	<b>Potential residual beneficial, neutral, or adverse effect</b>
		with emphasis on opportunities for women.	
Sexual Orientation	Scoped out.	Scoped out.	Scoped out.

## Appendix A

### Map of Study Area and Community Facilities





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All structure positions are indicative. The proposed works will be subject to detailed design development. The changes will be within limits of deviation specified in the Development Consent Order.

**Legend**

- Order Limits
- Main application site 1km buffer
- Community Assets**
- Community Centre
- Neighbourhood parks and leisure areas
- Places of Worship
- Schools

First Issue	AB	SS	CS	15/02/23	P01
Revision History	Drawn	Checked	Approved	Date	Rev.

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Drawing Title  
**Study Area and Community Facilities**

Purpose of issue				Suitability		
<b>SUITABLE FOR INFORMATION</b>				S2		
Drawn	Checked	Approved	Date	Scale	Size	
AB	SS	CS	15/02/23	1:20,000	A3	

DCO Application Ref.	APFP Regulation	DCO Document Ref.
TR020001	APFP 5(2)(q)	TR020001/APP/7.11

Drawing Number	Revision
LLADCO-3C-ARP-00-00-DR-ZG-0023	P01

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Project - Phase - Originator - Asset/Zone - Sub Asset - Type- Discp. - Number

## Appendix B

English Index of Multiple Deprivation (LSOA Level, 2015, MHCLG)

Proportion of the population aged 15 or under (ONS 2019 Population Estimates)

Proportion of the population between 16 and 24 years (ONS 2019 Population Estimates)

Proportion of the population over the age of 65 years (ONS 2019 Population Estimates)

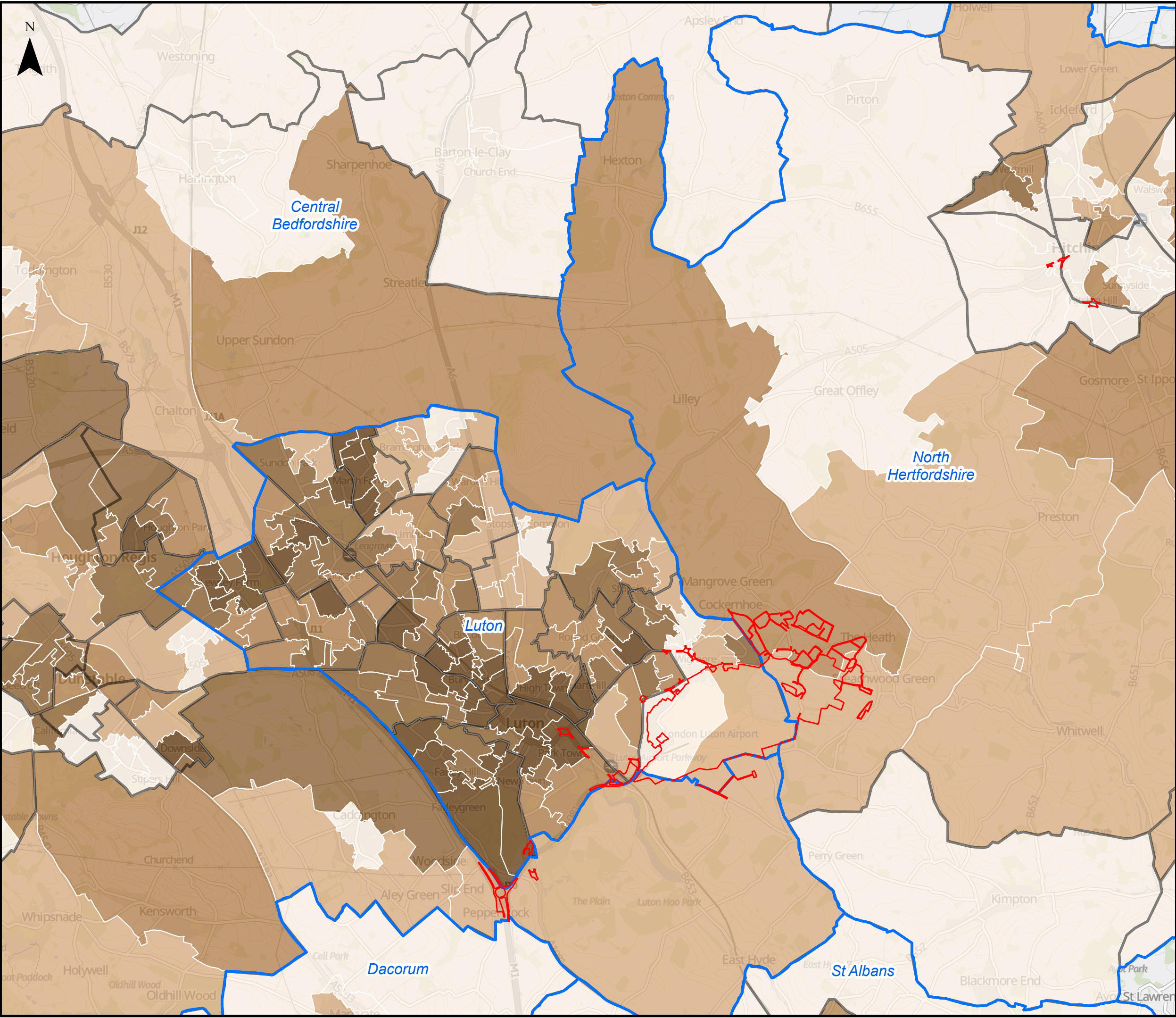
Proportion of the population that identifies as having Religious Faith (LSOA Level, 2011 Census)

Proportion of the population that is Black, Asian and Minority Ethnic (LSOA Level, 2011 Census)

Proportion of the population that is Female (ONS 2019 Population Estimates)

Proportion of the population whose activities are limited due to Long-Term Illness or Disability (LSOA Level, 2011 Census)





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**Legend**

- Order Limits
- Local Authority Boundaries
- Ward Boundaries

**Index of Multiple Deprivation (IMD) Decile (1= Most Deprived, 10 = Least Deprived)**

- 1 - 2
- 3 - 4
- 5 - 6
- 7 - 8
- 9 - 10

First Issue	AB	SS	CS	15/02/22	P01
Revision History	Drawn	Checked	Approved	Date	Rev.

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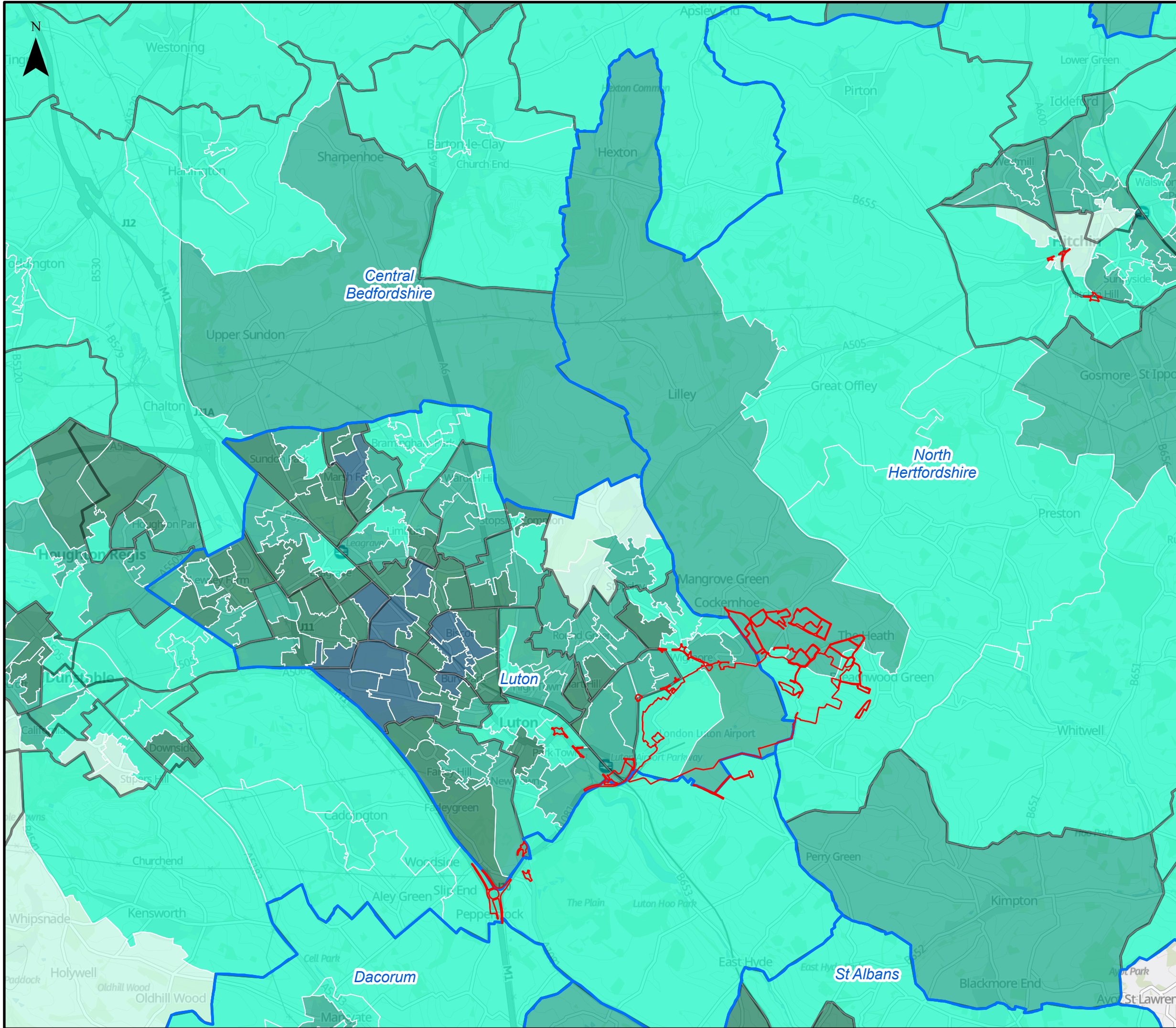
Drawing Title  
 English Index of Multiple Deprivation (IMD)  
 (Lower layer Super Output Areas (LSOA) Level, 2015,  
 Ministry of Housing, Communities & Local Government)

Purpose of issue				Suitability	
<b>SUITABLE FOR INFORMATION</b>				S2	
Drawn	Checked	Approved	Date	Scale	Size
AB	SS	CS	15/02/23	1:60,000	A3

DCO Application Ref.	APFP Regulation	DCO Document Ref.
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LLADCO-3C-ARP-00-00-DR-ZG-0017	P01
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**Legend**

- Order Limits
- Local Authority Boundaries
- Ward Boundaries

**Proportion of the population < 15 Years Old (England Average 19.1%)**

- > 15%
- 15 - 20%
- 20 - 25%
- 25 - 30%
- < 30%

First Issue	AB	SS	CS	15/02/22	P01
Revision History	Drawn	Checked	Approved	Date	Rev.

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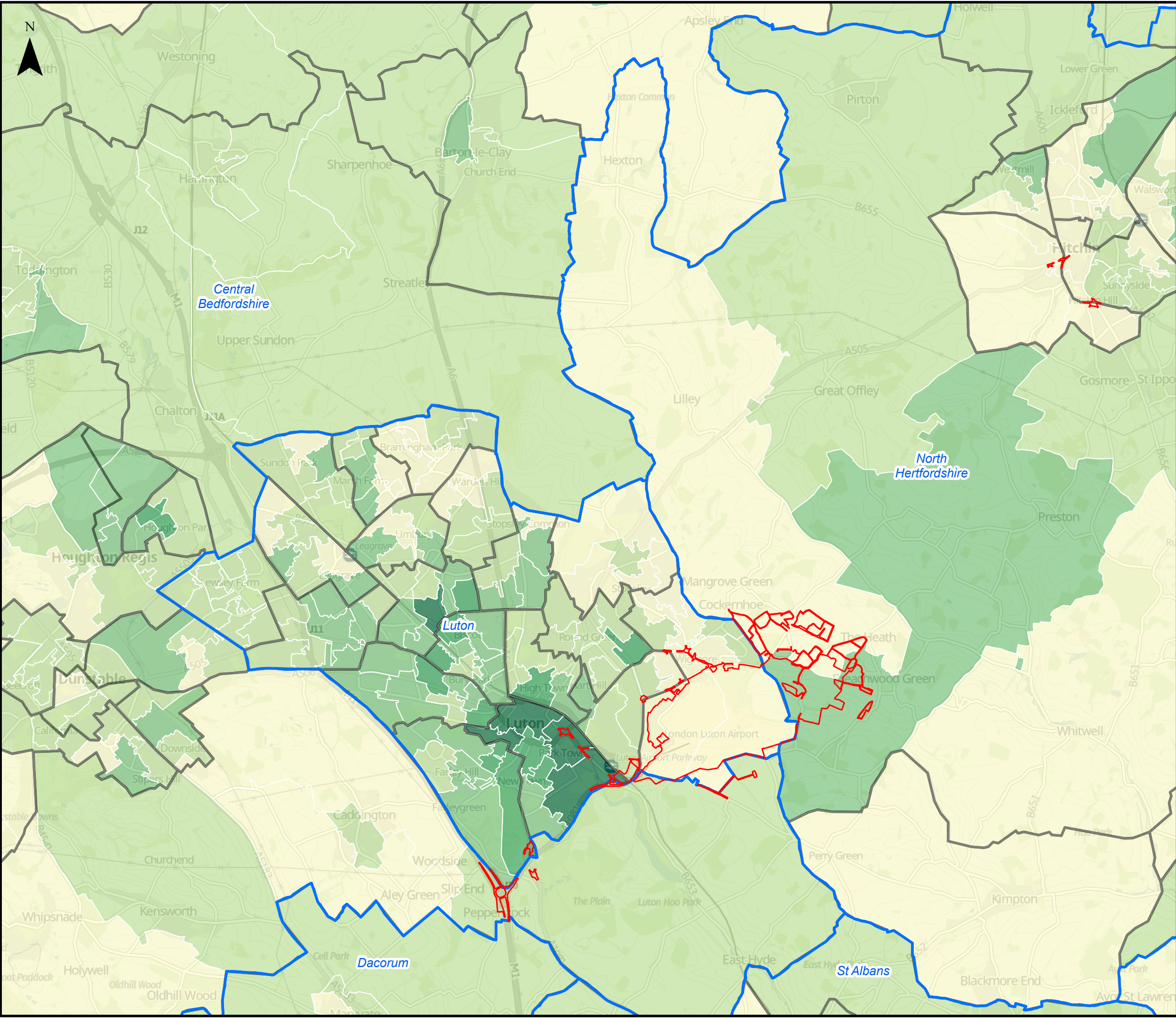
Drawing Title  
 Proportion of the population aged 15 or under  
 (Office for National Statistics 2019 Population Estimates)

Purpose of issue				Suitability		
SUITABLE FOR INFORMATION				S2		
Drawn	Checked	Approved	Date	Scale	Size	
AB	SS	CS	15/02/23	1:60,000	A3	

DCO Application Ref.	APFP Regulation	DCO Document Ref.
TR020001	APFP 5(2)(q)	TR020001/APP/7.11

Drawing Number	Revision
LLADCO-3C-ARP-00-00-DR-ZG-0015	P01
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**Legend**

- Order Limits
- Local Authority Boundaries
- Ward Boundaries

**Proportion of the population 16 - 24 Years (England Average 19%)**

- > 7.5%
- 7.5 - 10%
- 10% - 12.5%
- 12.5 - 15%
- < 15%

First Issue	AB	SS	CS	15/02/22	P01
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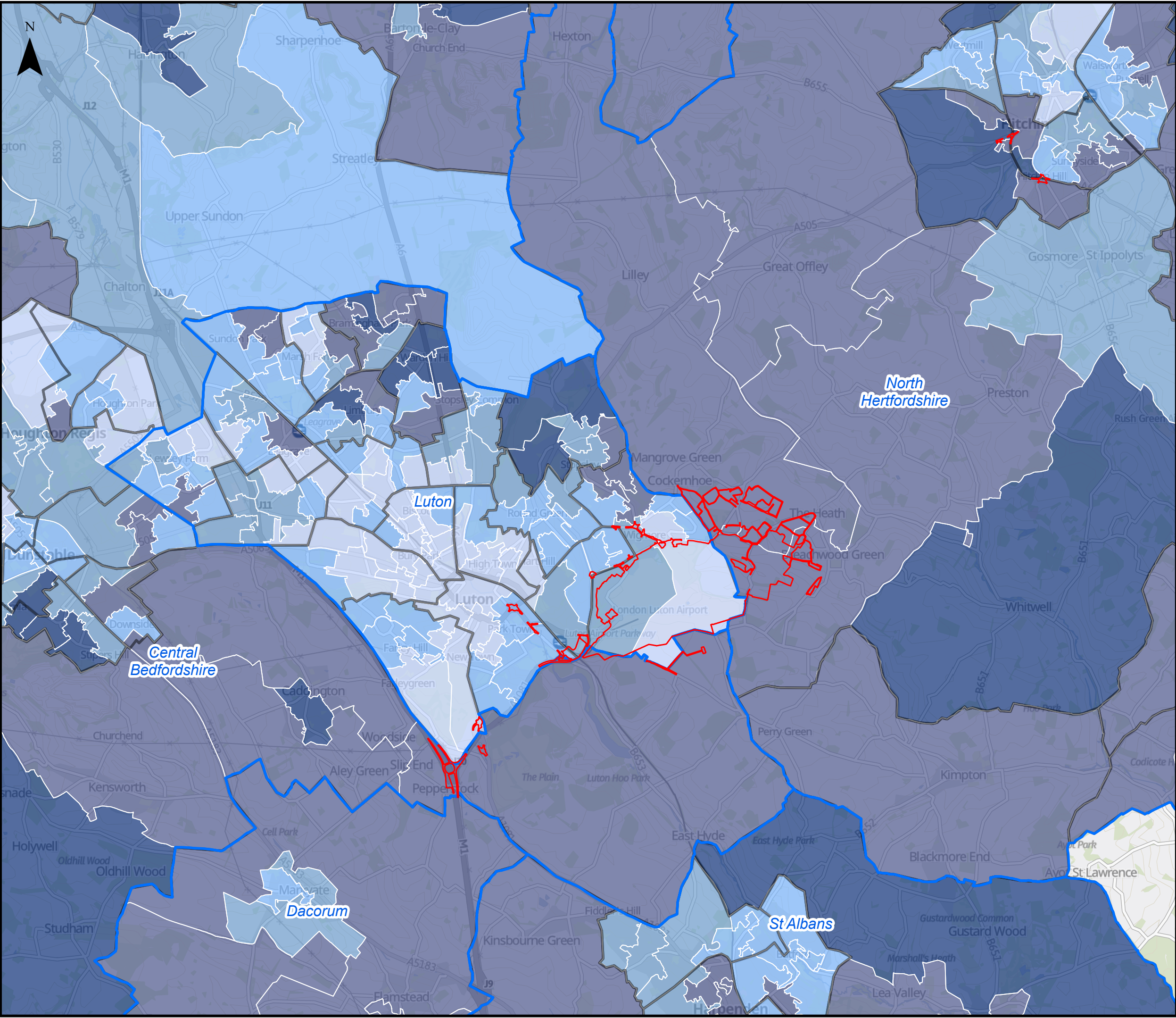
Drawing Title  
 Proportion of the population between 16 and 24 Years  
 (Office for National Statistics 2019 Population Estimates)

Purpose of issue				Suitability	
SUITABLE FOR INFORMATION				S2	
Drawn	Checked	Approved	Date	Scale	Size
AB	SS	CS	15/02/23	1:60,000	A3

DCO Application Ref.	APFP Regulation	DCO Document Ref.
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**Legend**

- Order Limits
- Local Authority Boundaries
- Ward Boundaries

**Proportion of the population over the age of 65 Years (England Average 19%)**

- < 10%
- 10 - 15%
- 15 - 20%
- 20 - 25%
- > 25%

First Issue	AB	SS	CS	15/02/22	P01
Revision History	Drawn	Checked	Approved	Date	Rev.

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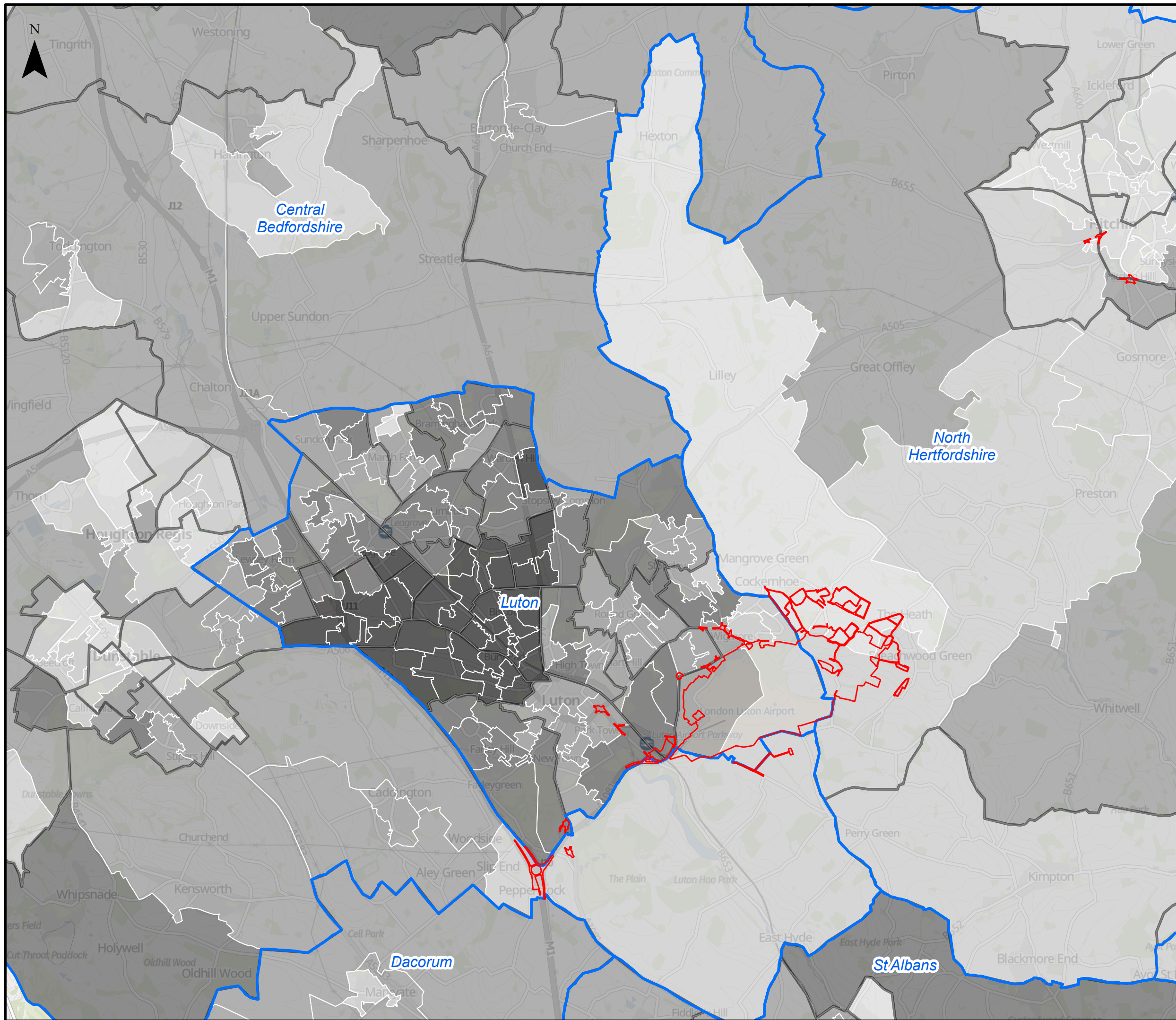
Drawing Title  
 Proportion of the population over the age of 65 Years  
 (Office for National Statistics 2019 Population Estimates)

Purpose of issue				Suitability		
SUITABLE FOR INFORMATION				S2		
Drawn	Checked	Approved	Date	Scale	Size	
AB	SS	CS	15/02/23	1:60,000	A3	

DCO Application Ref.	APFP Regulation	DCO Document Ref.
TR020001	APFP 5(2)(q)	TR020001/APP/7.11

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LLADCO-3C-ARP-00-00-DR-ZG-0016	P01
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**Legend**

- Order Limits
- Local Authority Boundaries
- Ward Boundaries

**Proportion of the population that identifies as having a Religious Faith (England Average 68%)**

- < 52%
- 52 - 66%
- 66 - 72%
- 72 - 80%
- > 80%

First Issue	AB	SS	CS	15/02/22	P01
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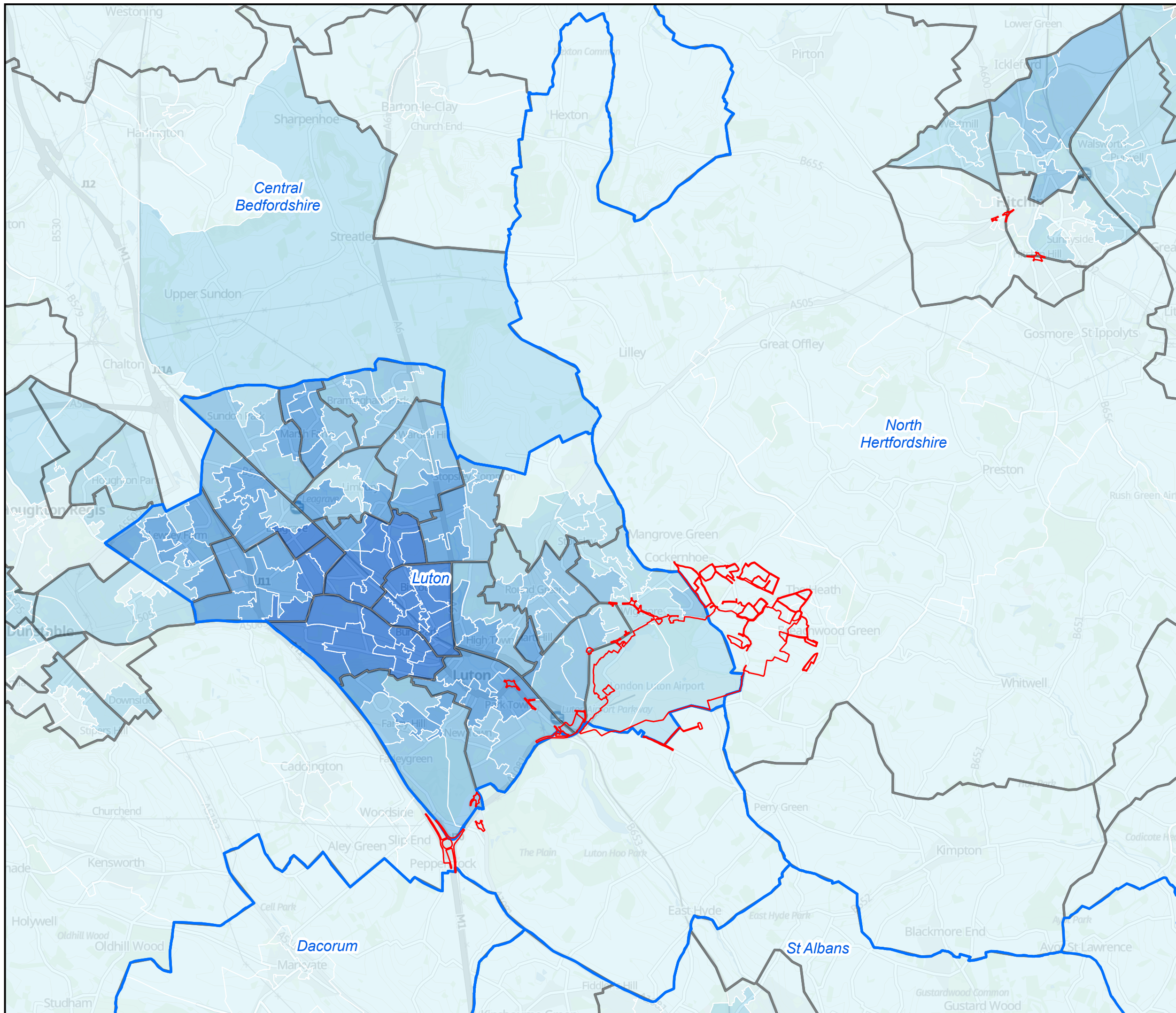
Drawing Title  
 Proportion of the population that identifies as having a Religious Faith (Lower Layer Super Output Areas (LSOA) Level, 2011 Census)

Purpose of issue				Suitability	
SUITABLE FOR INFORMATION				S2	
Drawn	Checked	Approved	Date	Scale	Size
AB	SS	CS	15/02/23	1:60,000	A3

DCO Application Ref.	APFP Regulation	DCO Document Ref.
TR020001	APFP 5(2)(q)	TR020001/APP/7.11

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LLADCO-3C-ARP-00-00-DR-ZG-0021	P01
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**Legend**

- Order Limits
- Local Authority Boundaries
- Ward Boundaries

**Proportion of the population that is Black, Asian and Minority Ethnic (England Average 14.6%)**

- < 10%
- 10 - 21%
- 21 - 37%
- 37 - 60%
- > 60%

First Issue	AB	SS	CS	15/02/22	P01
Revision History	Drawn	Checked	Approved	Date	Rev.

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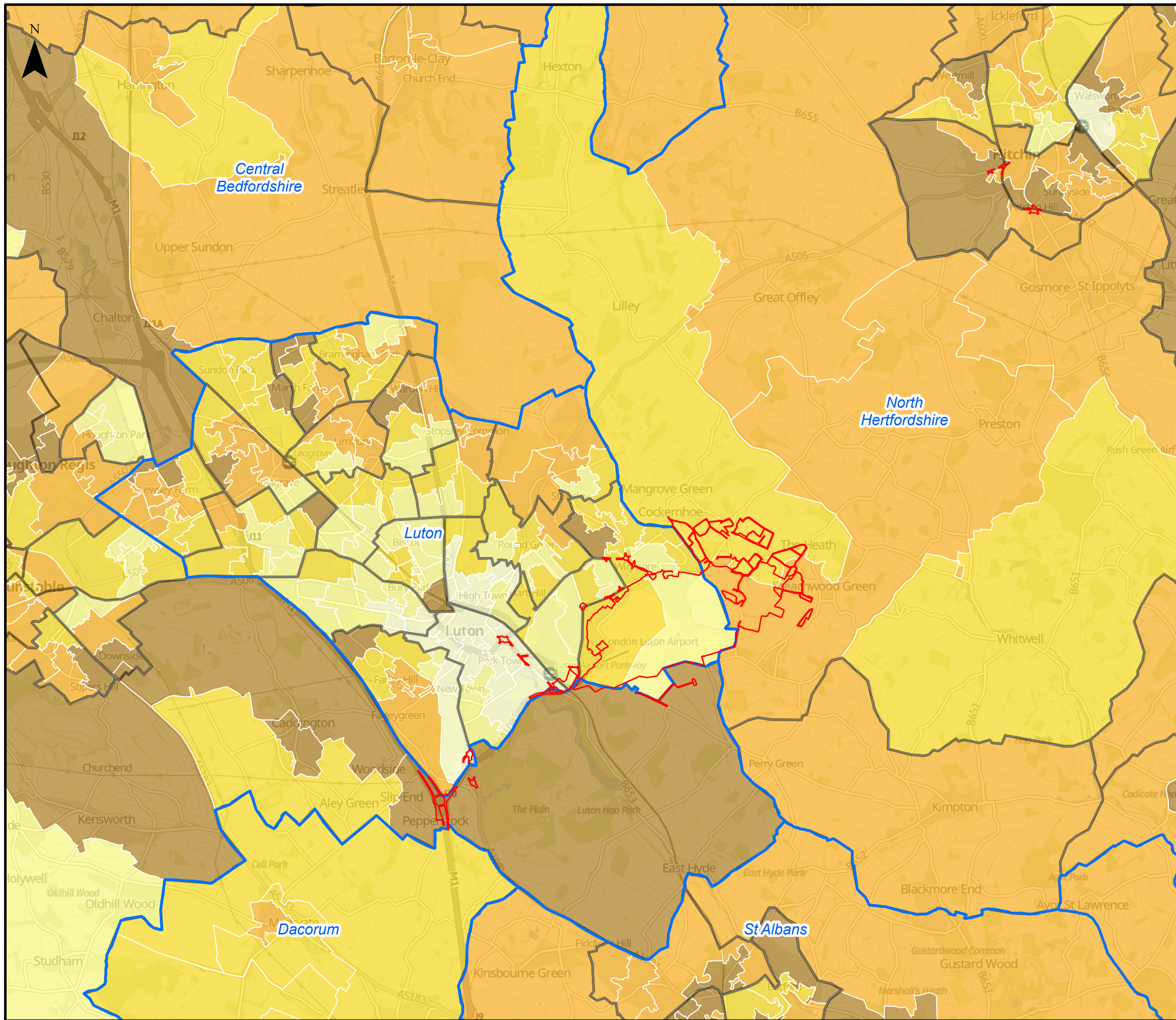
Drawing Title  
 Proportion of the Population that is Black, Asian and Minority Ethnic (Lower layer Super Output Areas (LSOA) Level, 2011 Census)

Purpose of issue				Suitability	
SUITABLE FOR INFORMATION				S2	
Drawn	Checked	Approved	Date	Scale	Size
AB	SS	CS	15/02/23	1:60,000	A3

DCO Application Ref.	APFP Regulation	DCO Document Ref.
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Drawing Number	Revision
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**Legend**

- Order Limits
  - Local Authority Boundaries
  - Ward Boundaries
- Proportion of population that is Female (England Average 50.5%)**
- < 45%
  - 45 - 48%
  - 48 - 50%
  - 50 - 52%
  - > 52%

First Issue	AB	SS	CS	15/02/22	P01
Revision History	Drawn	Checked	Approved	Date	Rev.

**Luton Rising** Our airport. Our community. Our planet.

Luton Rising  
 Hart House Business Centre  
 Kimpton Road, Luton, LU2 0LA  
[www.lutonrising.org.uk](http://www.lutonrising.org.uk)

**London Luton Airport Expansion Development Consent Order**

Drawing Title  
 Proportion of the population that is Female (Office for National Statistics 2019 Population Estimates)

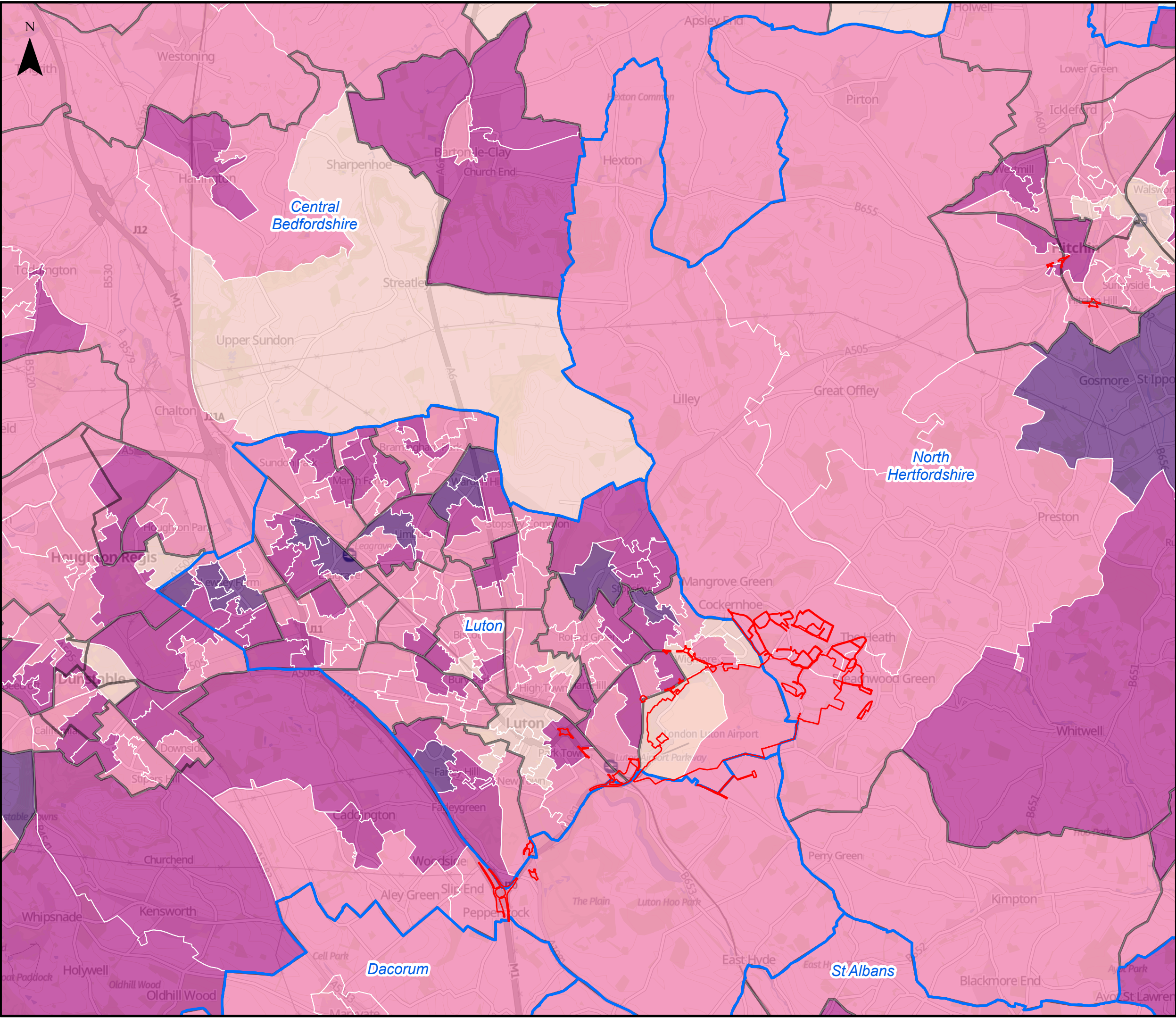
Purpose of issue <b>SUITABLE FOR INFORMATION</b>				Suitability S2	
Drawn	Checked	Approved	Date	Scale	Size
AB	SS	CS	15/02/23	1:60,000	A3

DCO Application Ref. TR020001	APFP Regulation APFP 5(2)(q)	DCO Document Ref. TR020001/APP/7.11
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Drawing Number LLADCO-3C-ARP-00-00-DR-ZG-0020	Revision P01
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Project - Phase - Originator - Asset/Zone - Sub Asset - Type - Discp. - Number





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All structure positions are indicative. The proposed works will be subject to detailed design development. The changes will be within limits of deviation specified in the Development Consent Order.

**Legend**

- Order Limits
  - Local Authority Boundaries
  - Ward Boundaries
- Proportion of the population with a Long Term Illness or Disability (England Average 17.6%)**
- > 5%
  - 5 - 10%
  - 10 - 15%
  - 15 - 20%
  - < 20%

First Issue	AB	SS	CS	15/02/22	P01
Revision History	Drawn	Checked	Approved	Date	Rev.

Luton Rising  
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**London Luton Airport Expansion  
Development Consent Order**

Drawing Title  
Proportion of the population whose activities are limited due to Long-term Illness or Disability (Lower Layer Super Output Areas (LSOA) Level, 2011 Census)

Purpose of issue				Suitability	
<b>SUITABLE FOR INFORMATION</b>				S2	
Drawn	Checked	Approved	Date	Scale	Size
AB	SS	CS	15/02/23	1:60,000	A3

DCO Application Ref.	APFP Regulation	DCO Document Ref.
TR020001	APFP 5(2)(q)	TR020001/APP/7.11

Drawing Number	Revision
LLADCO-3C-ARP-00-00-DR-ZG-0019	P01
Project - Phase - Originator - Asset/Zone - Sub Asset - Type- Discp. - Number	

## GLOSSARY AND ABBREVIATIONS

<b>Term</b>	<b>Definition</b>
Luton Rising	A trading name for London Luton Airport Limited, the owners of the airport
The airport	London Luton Airport
DCO	Development Consent Order
mppa	Million passengers per annum
EqIA	Equality Impact Assessment
PSED	Public-Sector Equality Duty
the Act	Equality Act 2010
PEIR	Preliminary Environmental Information Report
LBC	Luton Borough Council
NPPF	National Planning Policy Framework
ANP	Airports National Policy Statement
UNFCCC	United Nations Framework Convention on Climate Change
LTP	Local Transport Plan
JSNA	Joint Strategic Needs Assessment
ONS	Office for National Statistics
CWS	County Wildlife Sites
PRoW	Public Rights of Way
AQMA	air quality management area
APHR	Annual Public Health Report
IMD	Index of Multiple Deprivation
BAME	Black, Asian, and Minority Ethnic
PTH	public transport hub
NVQ levels	national vocational qualifications
AAR	Airport Access Road
HSPH	Harvard School of Public Health
BUSPH	Boston University School of Public Health
CTMP	Construction Traffic Management Plan





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- Ref 32 ONS ((2020) Live Births for England and Wales
- Ref 33 ONS Bedford, Luton and Milton Keynes CCG (<https://www.blmkccg.nhs.uk/find-a-service/>) [Accessed 20/10/2022]
- Ref 34 ONS (2021) Annual Population Survey. Ethnicity by age.
- Ref 35 ONS (2011) Census
- Ref 36 ONS (2011) Census
- Ref 37 ONS (2021) 2019 Sexual orientation, UK (Online). [Accessed 25/10/2021]
- Ref 38 DLUHC (2019) The English Indices of Deprivation 2019. *Statistical Release* (Online). [Accessed: 25/10/2021]
- Ref 39 ONS (2021) Annual Population Survey (Apr 2020 – Mar 2021 data).
- Ref 40 Centre for Cities (2021) *UK Unemployment Tracker* (Online). [Accessed: 25/10/2021]
- Ref 41 Level 1 includes: 1-4 O Levels/CSE/GCSEs (any grades) or entry level / foundation diploma;  
Level 2 includes: 5+ O Level (Passes)/CSEs (Grade 1)/GCSEs (Grades A\*-C) or School Certificate;  
Level 3 includes: 2+ A Levels/VCEs, 4+ AS Levels, or Higher School Certificate;  
Level 4 includes: Degree (for example BA, BSc), or Higher Degree (for example MA, PhD, PGCE)
- Ref 42 The table excludes 'other' qualifications and trade apprenticeships.
- Ref 43 Equality and Human Rights Commission (2010); *How Fair is Britain?* Report (Online). [Accessed 25/10/2021]
- Ref 44 Police UK (2021) *Crime map* (Online [Accessed: 25/10/2021]).
- Ref 45 ONS Census Population Change ([Link](#)).
- Ref 46 Holmes (2021), This Is Luton 2021 [REDACTED]. [Accessed: 20/10/2022].
- Ref 47 Level 1 includes: 1-4 O Levels/CSE/GCSEs (any grades) or entry level / foundation diploma;  
Level 2 includes: 5+ O Level (Passes)/CSEs (Grade 1)/GCSEs (Grades A\*-C) or School Certificate;  
Level 3 includes: 2+ A Levels/VCEs, 4+ AS Levels, or Higher School Certificate;  
Level 4 includes: Degree (for example BA, BSc), or Higher Degree (for example MA, PhD, PGCE)
- Ref 48 ONS (2019) *Population estimates – local authority based by single year of age*.
- Ref 49 S A Stansfeld, B Berglund, C Clark, I Lopez-Barrio, P Fischer, E Öhrström, MMHaines, J Head, S Hygge, I van Kamp, B F Berry, on behalf of the RANCH study team (2005) Aircraft and road traffic noise and children's cognition and health: a cross-national study. [Accessed 25/10/2021]
- Ref 50 World Health Organisation (no date): 'Children and noise: Children's health and the environment – WHO training package for the health sector' (Online). [Accessed 25/10/2021]
- Ref 51 European Environment Agency (2002) Children's health and environment: a review of evidence (Online). [Accessed: 25/10/2021]
- Ref 52 British Lung Foundation (no date): 'How air pollution affects your children's lungs' (Online). [Accessed: 25/10/2021]
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- Ref 54 Royal College of Physicians (2016) Every breath we take: the lifelong impact of air pollution (Online). [Accessed: 25/10/2021]
- Ref 55 Harvard School of Public Health (2013) Aircraft noise linked with heart problems (Online). [Accessed: 25/10/2021]
- Ref 56 Journal of Thoracic Disease (2015) Adverse effects of outdoor pollution in the elderly (Online). [Accessed: 25/10/2021]
- Ref 57 World Health Organisation (no date): 'Children and noise: Children's health and the environment – WHO training package for the health sector' (Online). [Accessed: 25/10/2021]
- Ref 58 Journal of Thoracic Disease (2015) Adverse effects of outdoor pollution in the elderly (Online). [Accessed: 25/10/2021]
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- Ref 62 Patient.info (2015) Diseases and different ethnic groups (Online). [Accessed: 25/10/2021]
- Ref 63 Andrew Powell, House of Commons Library (2021) Unemployment by Ethnic Background. Briefing Paper (Online). [Accessed: 25/10/2021]
- Ref 64 Plan International UK (2018) Street Harassment (Online). [Accessed: 25/10/2021]
- Ref 65 ONS (2015) Crime Survey for England and Wales.