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**8.82 Applicant's response to Written Questions - Health
and Community Effects**

Infrastructure Planning (Examination Procedure) Rules 2010

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The Planning Act 2008

The Infrastructure Planning (Examination Procedure) Rules 2010

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

**8.82 APPLICANT'S RESPONSE TO WRITTEN QUESTIONS -
HEALTH AND COMMUNITY EFFECTS**

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1 RESPONSE TO EXAMINING AUTHORITY WRITTEN QUESTIONS (HEALTH AND COMMUNITY EFFECTS)

Table 1.1: Responses to the Examining Authority's Written Questions (Health and Community Effects)

PINS ID	Question / Response
HAC.1.1	<p>Question to Applicant and Prospect House Day Nursery:</p> <p>Reprovision of Prospect House Day Nursery Explain what the implications are if this facility is not re-provided. <i>You may want to link the response to the response to question CA.1.9</i></p> <p>Response: In relation to the health assessment, paragraph 13.9.20 of Chapter 13 Health and Community Revision 1 of the Environmental Statement (ES) [AS-078] confirms that without mitigation, the loss of the nursery would result in a major adverse permanent effect on mental health and wellbeing, which is significant. In relation to the community assessment, paragraph 13.9.33 of Chapter 13 Health and Community Revision 1 of the ES [AS-078] confirms that the loss of the nursery, prior to any mitigation, would result in a major adverse community effect, which is significant.</p> <p>Prospect House Day Nursery is located on Prospect Way in close proximity to the airport. The nursery caters for around 94 children with a maximum capacity of 114 children aged between three months to four years old and serves a catchment in the Luton and Harpenden area. The nursery caters for children from a diverse range of ethnic backgrounds with staff speaking a variety of languages. The facility is currently rated 'Good' by the Office for Standards in Education, Children's Services and Skills (OFSTED). The nursery is purpose built, offering indoor facilities and outdoor play areas. The nursery is open from 7:30 to 18:30 Monday to Friday, all year round except for a week at Christmas and on all other bank holidays.</p> <p>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 respectfully, from Prospect House Day Nursery. However, these facilities only cater for children between the ages of two and four years old, and not those under two. In addition, they are only open during school term time and there are currently no spaces available at Crawley Green & Wenlock Pre-School.</p> <p>The nearest comparable childcare facility (in terms of age range and opening times) is Kinder City nursery which is located approximately 1.59km away. However, there are currently no available spaces at this nursery. The nearest comparable facility with available spaces is Ashcroft and Ramridge Community nursery which is located approximately 1.66km away and caters for children between the ages of zero and four years old.</p> <p>Based on the above, Prospect House Day Nursery is a well-used facility, that serves an important purpose for the local community, and there are no alternative comparable childcare facilities within 1.5km of this existing nursery. As such, if the facility is not re-provided, existing users of the nursery will have to travel much further distances. Due to the age ranges of the children (0-4 years), a sensitive approach is required as they would find it more difficult to respond to change. The loss of the facility more generally will reduce the existing levels of early years and childcare provision within the area. This is an issue more generally, given many of the surrounding facilities are currently at capacity. Overall, if the facility is not re-provided, this would result in a major adverse significant community effect and a major adverse permanent effect on mental health and wellbeing. The Applicant's response to question CA.1.9, provides an update on the progress of the section 106 agreement for the relocation of the nursery. The Applicant will also be able to provide the ExA with an update on the latest status of negotiations with the nursery at Compulsory Acquisition Hearing 2 scheduled for the end of November 2023.</p>
HAC.1.2	<p>Question to Applicant:</p> <p>Ace Sandwich Bar Explain what the implications are if this facility is not re-provided. <i>You may want to link the response to the response to question CA.1.10</i></p>

PINS ID	Question / Response
	<p>Response: The community assessment in Table 13.21 of Chapter 13 Health and Community Revision 1 of the ES [AS-078] provides a summary of the assessment of the loss of Ace Sandwich Bar. This confirms that without mitigation, the loss of Ace Sandwich Bar would result in a minor adverse effect which is not significant.</p> <p>Ace Sandwich Bar is located on Percival Way in proximity to the airport. The café provides takeaway and dine in services. It is open from 07:00 to 14:00/15:00 on Monday to Friday and from 08:00 to 14:00 on Saturday and Sunday. It caters for local workers (airport workers and taxi drivers) as well as those using the airport. Table 13.21 of Chapter 13 Health and Community Revision 1 of the ES [AS-078] notes that without mitigation, the magnitude of impact has been assessed as 'high' as the facility would be permanently lost. The sensitivity of the receptor has been assessed as 'very low' as there are many comparable and accessible alternative cafes within the area and users of the facility can easily respond to change. Overall, if the facility is not re-provided, this would not result in a significant community impact. An update on negotiations with Ace Sandwich Bar is provided in the answer to question CA.1.10. The Applicant will also be able to provide the ExA with an update on the latest status of negotiations at Compulsory Acquisition Hearing 2 scheduled for the end of November 2023</p>
HAC.1.3	<p>Question to the Applicant and Joint Host Authorities:</p> <p>Joint Strategic Needs Assessment (JSNA) The ExA requests that the Applicant and the Joint Host Authorities meet to agree any specific datasets relating to local health inequalities within the JSNA document(s) relevant to the Proposed Development that are necessary to ensure that the assessment, receptor selection and any consequent mitigation is representative of the likely significant effects. The Health and Community chapter should be updated accordingly, where possible by Deadline 4 and no later than Deadline 5.</p> <p>Response: The Applicant has undertaken a review of JSNA datasets relating to health and health inequalities and a comparison with datasets included in the ES. The Applicant will meet with the Joint Host Authorities to review these datasets and, subject to the outcome of these discussions, will update the Health and Community chapter accordingly for Deadline 5.</p>
HAC.1.4	<p>Question to the Applicant:</p> <p>Future baseline Future baseline information is provided for the Luton administrative area in the ES [AS-078, Section 13.7]. Can the Applicant provide a proportionate description of the future baseline for the wider study area?</p> <p>Response: The future baseline for the wider study area is as follows:</p> <p><i>Hertfordshire</i> The projected population growth for Hertfordshire is relatively stable. Over the decade from 2021-31, Hertfordshire's population is expected to grow by 2%. Older age groups are forecasted to have the largest increase in population, while a decline in population is expected for children and working age groups.</p> <p><i>Central Bedfordshire</i> The population of Central Bedfordshire increased by 15.7% from 2011 to 2021. This rate of growth was higher than the growth rate in the overall East of England region, which was 8.3%, and higher than the national growth rate of 6.6%. The population of Central Bedfordshire is expected to increase by 22.6% in the next decade. The number of people aged over 80 is expected to double by 2043.</p> <p><i>Buckinghamshire</i> The population in Buckinghamshire increased by 9.5% between 2011 and 2021. Buckinghamshire's population is expected to increase at a rate of 3.4% for the next decade. There is a forecasted 20.3% population increase for the 15-19 age band and a 17.7% increase for the 60+ age group from 2020 to 2030.</p>

PINS ID	Question / Response
HAC.1.5	<p>Question to the Applicant:</p> <p>Community assessment ES Chapter 13 [AS-078, Table 13.6] states that population within the lowest observed adverse effect level (LOAEL) contour and population affected by issues such as economic growth and employment are scoped out of the community assessment. Provide further justification for scoping these matters out and evidence of any agreement with relevant local authorities regarding this approach.</p> <p>Response: Chapter 13 Health and Community Revision 1 of the ES [AS-078] at paragraph 13.3.5, confirms that the study area for the community assessment is based on the spatial distribution of the impacts of the Proposed Development. Paragraph 13.3.17 identifies the matters which are scoped into the community assessment including loss or gain of community resources, displacement of community resources, changes to the amenity of a resource (referred to as an in-combination effect), and isolation of communities from community services or facilities. Within Table 13.6 of Chapter 13 Health and Community Revision 1 of the ES [AS-078], the wider study area described as 'areas within which there are likely to be environmental impacts' covers the full extent where in-combination community effects are likely to occur.</p> <p>The other two study areas (population within the LOAEL and population affected by issues such as economic growth, employment and changes to the housing market) relate to specific effects which are reported in other topic chapters, namely Chapter 16 Noise and Vibration of the ES [REP1-003] and Chapter 11 Economics and Employment of the ES [APP-037]. As the community assessment only reports in-combination community effects where there are two or more residual significant effects, it is unlikely that there will be in-combination effects within these much wider areas. Regardless of this, the wider study area described as 'areas within which there are likely to be environmental impacts' provides a catch all for any wider potential effects.</p> <p>As reported in Table 13.7 of Chapter 13 Health and Community Revision 1 of the ES [AS-078], the community assessment was discussed at the meeting with the Director of Public Health, Luton Borough Council on 7 December 2019. The scoping out of these study areas was not raised as an issue. Nor has it been raised as an issue by any other stakeholders.</p>
HAC.1.6	<p>Question to the Applicant:</p> <p>Assessment - Sensitivity ES Chapter 13 [AS-078, Table 13.20] states that receptor sensitivity is medium (based on average prevalence of children and young people and people living in areas known to exhibit poor economic and/ or health indicators). The baseline assessment in AS-078 ES Chapter 13 [AS-079, section 13.7] and in the Equality Impact Assessment [AS-129] indicates that areas such as Wigmore, Crawley, Farley Ward and South Ward have younger than average populations and some below average health and economic indicators, and that Caddington and Hitchwood and Offa and Hoo have higher than average populations in the 65+ age group, with some below average health indicators. Explain why a medium rather than high level of sensitivity has been applied when considering these factors and why this represents a worst case for health effects on affected populations.</p> <p>Response: The receptor sensitivity presented in Table 13.20 of Chapter 13 Health and Community Revision 1 of the ES [AS-078] is determined on a case-by-case basis for each impact assessed and ranges from Low to High, taking account of the characteristics of the population exposed to each impact and any specific vulnerabilities in relation to the impact in question. The aim of the sensitivity assessment is to give a reasonable overview of the sensitivity of the receptor population, rather than a 'worst case'. The presence of groups such as older people, children or deprived communities within the receptor population does not necessarily mean that overall sensitivity will be high. However, where relevant, the presence of sub-populations with higher sensitivity is noted.</p> <p>The assessment of medium sensitivity in the first line of Table 13.20 applies to the affected population as a whole, which includes an average or close to average proportion of groups who are more likely to experience health effects as a result of the impact in question by virtue of their sociodemographic or health status (see Table 13.9: Guidelines for the assessment of sensitivity). It is noted in Table 13.20 that sensitivity is likely to be higher in parts of the local Luton area that have higher levels of deprivation and poorer health outcomes.</p>

PINS ID	Question / Response
HAC.1.7	<p>Question to the Applicant:</p> <p>Assessment - Receptors ES Appendix 13.1 [APP-083, paragraph 2.1.4] references quality assessments in seven locations including four locations that are not explicitly referenced in ES Chapter 13 [AS-078, Tables 13.20 and 13.21] (Wigmore allotments, Lea Valley Walk, Someries Castle and Raynham Way Recreation Ground). Explain how these quality assessments have been taken into account in the assessment of community impacts.</p> <p>Response: Appendix 13.1 Open Space Survey Methodology of the ES [APP-083] at paragraph 2.1.1 confirms that the purpose of the quality assessments was to verify resources identified via desk studies. In addition, the assessments sought to gather data on the condition and context of the resources, and the sensitivity of the resources and receptors, allowing informed judgements to be made about the likely levels and nature of usage, and of the magnitude of impact of the Proposed Development. Paragraph 2.1.3 confirms that the quality assessment locations were those locations which were considered most likely to have significant direct or in-combination effects from the Proposed Development. These locations were therefore identified at an early stage of the assessment process to establish the baseline.</p> <p>Wigmore Valley Park was the only location where direct land take effects were identified. At the remaining locations, there was potential for a reduction in the amenity of users due to in-combination effects resulting from residual significant air quality, noise and vibration, traffic and transport, visual effects, or light effects. As the design of the Proposed Development progressed and mitigation was identified, no in-combination effects on these resources were identified. As a result, most of these locations are not explicitly referenced in the Chapter 13 Health and Community Revision 1 of the ES [AS-078] as there were no in-combination effects to report (significant or otherwise).</p> <p>Although the impact on Wigmore Valley Park was not deemed to result in a significant effect, this was included in Chapter 13 Health and Community Revision 1 of the ES [AS-078] as it represents an important community resource which is subject to direct land take effects. The user quality assessment fed into the assessment of this.</p>
HAC.1.8	<p>Question to the Applicant:</p> <p>Assessment – Receptors Confirm how the assessment has taken into account impacts on the Sue Ryder Neurological Care Centre at Stagenhoe, including any effect on long term residential receptors.</p> <p>Response: The community assessment in Chapter 13 Health and Community Revision 1 of the ES [AS-078] considers 'in-combination effects' which relate to changes in the amenity of a resource due to combined environmental impacts (noise, air quality, traffic, visual effects). Paragraph 3.1.5 of Appendix 13.4 of the ES [APP-086] confirms that an in-combination community effect occurs where there are two or more residual significant effects. All community facilities including long term residential receptors and care facilities such as Sue Ryder Neurological Care Centre at Stagenhoe were assessed for the potential in-combination community effects. No in-combination community effects on this facility or any other long term residential receptors or care facilities were identified through the assessment.</p> <p>The health assessment assesses potential effects at a population level rather than at an individual receptor level. The health assessment in Chapter 13 Health and Community Revision 1 of the ES [AS-078] provided a similar assessment of the impacts of the Proposed Development on the health determinant of 'neighbourhood quality', which is determined by the character and attractiveness of the public realm within a neighbourhood. Paragraph 3.1.4 of Appendix 13.4 of the ES [APP-086] confirms that an impact on this health determinant has been identified where there are two or more significant impacts on the physical environment, i.e. noise, air quality, landscape, visual, light and traffic and transport impacts. No neighbourhood quality impact was identified in the area in which this receptor is located.</p>
HAC.1.9	<p>Question to the Applicant and Luton Borough Council:</p> <p>Assessment – Receptors</p>

PINS ID	Question / Response
	<p>Provide an update on ongoing discussions regarding effects of asylum seekers on local housing market assessment assumptions.</p> <p>Response: Following engagement with Luton Borough Council (LBC) in August 2023, their housing team raised concerns about the impact on housing as the introduction of a temporary construction workforce may increase demand within the local housing rental market and hotel market, potentially affecting prices and reducing access to affordable housing for local people. LBC have noted that sensitivity in the Luton area may be higher due to:</p> <ul style="list-style-type: none"> • LBC's hotel market having currently been significantly skewed by the Home Office accommodating asylum seekers impacting price and availability and causing huge budget pressures for LBC; and • LBC having seen a significant increase in demand for their homeless services, with around 500 requests regarding homelessness per month. This is having a huge impact on LBC's temporary accommodation and LBC sometimes struggle to find hotel places for households who need temporary accommodation in the borough. <p>The Health and Community assessment, Chapter 13 Health and Community Revision 1 of the ES [AS-078], assumes that approximately 48% of construction workers would be home based and live within commuting distance (60-minute drive), so would not require local accommodation. On this basis impacts on housing demand were considered to be low and overall effects minor adverse (not significant).</p> <p>The Health and Community assessment, Chapter 13 Health and Community Revision 1 of the ES [AS-078], table 13.20 does already acknowledge that receptor sensitivity may already be higher in the Luton area. It highlights that by developing local training and skills and focusing on target groups such as those out of work, the Employment and Training Strategy [APP-215] will also act as a mitigation to the effects on housing need. It will increase the ability of existing economically active and inactive populations in Luton and the Three Counties to engage with airport-related construction employment thus reducing, the increase in housing need or in commuting that may result.</p> <p>The Applicant is meeting with Luton Borough Council again on the 13 November 2023 to discuss this issue further.</p>
HAC.1.10	<p>Question to the Applicant:</p> <p>Assessment – Effects on Raynham Way Recreation Ground</p> <p>ES Appendix 13.2 [APP-084, Table 2.3] identifies a moderate adverse in-combination significant effect on Raynham Way Recreation Ground. Explain why this is not reported in ES Chapter 13 [AS-078] assessment summary tables and what, if any, mitigation is required to address this effect.</p> <p>Response: The quality assessment locations in Appendix 13.1 Open Space Survey Methodology of the ES [APP-083] were identified at an early stage of the assessment process in order to establish the baseline. These locations were identified as they were considered most likely to have significant direct or in-combination effects from the Proposed Development. The quality assessment shown in Appendix 13.2 Open Space Survey Results of the ES [APP-084] in Table 2.3 for Raynham Way Recreation Ground is an old version of the assessment which has been included in error. As the design of the Proposed Development has progressed and mitigation measures have been identified, the previously identified significant in-combination effect in this location have fallen away.</p> <p>This specifically applies to the significant noise effect identified in Table 2.3. Chapter 16 Noise and Vibration of the ES [REP1-003] confirms that Raynham Way Community Centre (also applying to Raynham Way Recreation Ground) would not experience any residual significant noise effects during construction or operation. There continues to be a residual significant visual effect on Raynham Way Recreation Ground during construction (Phase 2b) and operation, as confirmed in Chapter 14 Landscape and Visual Revision of the ES [AS-079]. However, paragraph 3.1.5 of Appendix 13.4 Methodology for Health and Community Assessment of the ES [APP-086] confirms that an in-combination community effect occurs where there are two or more residual significant effects. As only one applies, there is therefore, no significant in-combination effect on Raynham Way Recreation Ground.</p> <p>Table 2.3 in Appendix 13.2 Open Space Survey Results of the ES [APP-084] is therefore included in error and it should have been removed from the Appendix. Section 2.2 and Table 2.3 of Appendix 13.2 Open Space Survey Results of the ES [APP-084] should be deleted. This will be noted in the next submission of the Errata Document. The significant community effects identified in Chapter 13 Health and Community Revision 1 of the ES [AS-078] are correct and there are no effects missing.</p>

PINS ID	Question / Response
HAC.1.11	<p>Question to the Applicant:</p> <p>Assessment – Errata regarding conclusions Provide further justification for amending a conclusion of ‘likely significant operational effects on perception and uncertainty’ in ES paragraph 13.9.3 (Chapter 13 Health and Community of the ES [AS-078]) to ‘no likely significant effects during operation’ within the errata document provided at D1 [REP1-015]. Whilst it is clear that some uncertainty would be removed once the Proposed Development was constructed, it is unclear whether all of the perception issues eg as identified in ES paragraph 13.9.5 (a to h) would be resolved. The amendment does not appear consistent with the following text in ES paragraph 13.9.4 which states “<i>Public concern is likely to be highest during the planning and construction stages</i>”, implying that concerns are still likely during operation, or with the conclusions presented in the Cumulative Effects chapter (and there may be other instances within the ES), which reference all assessment phases for perception and uncertainty.</p> <p>Response: The assessment of perception and uncertainty in Chapter 13 Health and Community Revision 1 of the ES [AS-078] considers effects on people’s mental wellbeing that occur before the impacts of the Proposed Development are realised. During the project planning phase, these effects relate to both construction and operational impacts; during the construction phase these effects relate to operational impacts. Once the impacts of the Proposed Development occur and are felt by the population, concerns will relate to actual, rather than perceived impacts.</p> <p>The errata document does not remove the effect on perception and uncertainty but clarifies that this assessment applies to the planning and construction phases only. At the operational stage the effects of the Proposed Development will be fully realised and experienced by the affected communities. Therefore, by definition, the perception and uncertainty does not apply at operation. The assessment of operational health effects includes consideration of both physical and mental health and wellbeing, but this is distinct from the assessment of perception and uncertainty on mental wellbeing.</p>
HAC.1.12	<p>Question to the Applicant:</p> <p>Assessment – Impacts on Neighbourhood Quality ES Chapter 13 [AS-078, Table 13.20] suggests that no effect will arise in relation to Neighbourhood Quality during operation. Explain how this conclusion was reached and why, for example, the Proposed Development would not result, over time, in an increase in the proportion of rental properties, which could lead to a lower neighbourhood quality (or perception of lower quality) due to perceived lower maintenance standards and adverse effects on neighbourhood quality.</p> <p>Response: The term ‘neighbourhood quality’ is used in the human health assessment in Chapter 13 Health and Community Revision 1 of the ES [AS-078] to refer to a combination of two or more significant impacts on the physical environment i.e. noise, air quality, landscape, visual and light and traffic and transport impacts. When multiple environmental factors are altered there may be compounding impact on the quality of the local environment, affecting people’s level of satisfaction with their living environment, which in turn may affect their wellbeing (see paragraph 13.5.6). Social and economic effects such as impacts on the rental property market do not form part of this assessment.</p> <p>The assessment has not identified any locations where there are significant impacts on more than one environmental aspect (noise, air quality etc) and therefore no neighbourhood quality effects have been identified, as described in Table 13.20.</p> <p>Impacts on the availability and quality of rental properties are assessed under the ‘housing market’ health determinant. While it is recognised that many aspects may contribute to neighbourhood quality in the general sense, specific definition and separation of health determinants is necessary to prevent duplication and double counting in the assessment.</p>
HAC.1.13	<p>Question to the Applicant:</p> <p>Assessment – Impacts on community spaces Explain how the Health and Community chapter [AS-078] has taken account of other public parks within Luton that are likely to experience an increase in overflights or an increase in noise levels above the baseline (eg Luton Hoo Memorial Park and Stockwood Park).</p>

PINS ID	Question / Response
	<p>Response: The community assessment in Chapter 13 Health and Community Revision 1 of the ES [AS-078] has considered the potential for a reduction in the amenity of users of public parks within Luton by assessing the potential for in-combination community effects from the Proposed Development. Paragraph 3.1.5 of Appendix 13.4 Methodology for Health and Community Assessment of the ES [APP-086] confirms that an in-combination community effect occurs where there are two or more residual significant effects from air quality, noise and vibration, traffic, and transport, or visual or light effects on a community receptor. No in-combination community effects were identified at Luton Hoo Memorial Park or Stockwood Park.</p> <p>The human health assessment in Chapter 13 Health and Community Revision 1 of the ES [AS-078] has considered impacts on public parks under the health determinant heading of 'access to open space, recreation, and physical activity'. The evidence for health outcomes associated with this determinant are set out in Appendix 13.5 Evidence Review for Health Assessment Revision 1 of the ES [AS-084], section 3.1. The evidence shows that access to green space is associated with mental and social wellbeing while physical activity is associated with a range of physical and mental health benefits. The assessment has considered whether impacts on public parks and other green spaces is likely to result in changes to the ways in which these spaces are used, or to the user experience, that would result in a significant reduction in the health benefits gained by users. In the case of parks and open spaces experiencing an increase in overflights, it was considered that, while a change in the noise environment may be noticeable, this would not materially detract from the health benefits gained from access to green space and engagement in physical activity. Therefore, no health effects are identified in the ES.</p>
HAC.1.14	<p>Question:</p> <p>Monitoring of health effects</p> <p>The UKHSA [RR-1546] recommended that health monitoring should be undertaken in light of the scale of adverse noise impacts from the Proposed Development. Explain what specific, proportionate monitoring could be undertaken to enable understanding of impacts on health and quality of life for affected communities and how this could be used to inform future mitigation requirements</p> <p>Response: The Applicant notes that this question is directed to the UKHSA and does not consider it necessary to provide a full response until it has had the opportunity to consider the response provided by the UKHSA at Deadline 4. However, the Applicant notes that evidence on the effects of noise on health and wellbeing is best established through large-scale, national studies. The airport operator supports existing studies of this kind, for example by providing data to the Aviation Night Noise Effects (ANNE) Study (Ref 1).</p>
HAC.1.15	<p>Question:</p> <p>Need for requirements in relation to health and wellbeing</p> <p>The Joint Host Authorities' LIR [REP1A-003, paragraphs 7.8.7 to 7.8.9] concludes that the Proposed Development would create adverse health and wellbeing effects on residents during operation and recommends that additional requirements should be included in the draft DCO to mitigate this negative impact. Please provide further detail of the requirements that should be included, including any preferred drafting.</p> <p>Response: The Applicant notes that this question is directed to the Joint Host Authorities and does not consider it necessary to provide a response at this time.</p>

REFERENCES

Ref 1: Aviation Night Noise Effects (ANNE) Study 2 [Accessed October 2023]