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# London Luton Airport Expansion

Planning Inspectorate Scheme Ref: TR020001

Volume 8 Additional Submissions (Examination)

**8.159 Applicant's Response to Written Questions - Health  
and Community Effects**

Infrastructure Planning (Examination Procedure) Rules 2010

Application Document Ref: TR020001/APP/8.159

**The Planning Act 2008**

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

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

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**8.159 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.2.1	<p><b>Question:</b></p> <p><b>Distribution of disability adjusted life years (DALYs)</b>  ES Chapter 13 [AS-078, paragraph 13.9.67] suggests that less than one additional day per person would be lost in the affected population compared with the Do Minimum scenario between 2027 and 2043. Confirm whether the distribution of effects is such that it is appropriate to draw conclusions based on average DALYs within the population, or whether the change in DALYs is linked directly to proximity to flightpaths and is therefore spatially restricted, concentrating the impact on the population below the flight path?</p> <p><b>Response:</b></p> <p>The Applicant confirms that the Disability Adjusted Life Years (DALYs) presented in <b>Chapter 13 Health and Community of the ES</b> for annoyance [AS-078, Table 13] are provided as a total across the air noise study area. The statement referring to 'equivalent to less than 1 additional day per person in the affected population' in <b>Chapter 13 of the ES [AS-078, paragraph 13.9.67]</b> was included solely to provide context of the scale of the impact of annoyance due to the Proposed Development in the form of an average DALY across the population within the air noise study area.</p> <p>As noted later in the same paragraph of <b>Chapter 13 of the ES [AS-078, paragraph 13.9.67]</b>, the distribution of effects is likely to vary across the population, with the changes in DALYs lost across the population being proportionally smaller with increasing distance from the airport. This is consistent with the assessment in <b>Chapter 16 Noise and Vibration [REP1-003]</b>, where significant effects on health and quality of life are identified at higher noise exposures closer to the airport where exposure is above the Significant Observed Adverse Effect Level (SOAEL) and no significant effects are identified further from the airport.</p>
HAC.2.2	<p><b>Question: to UK Health Security Agency (UKHSA)</b></p> <p><b>Health monitoring</b>  If health monitoring was to be secured by requirement, can the UKHSA confirm whether it would want to have an ongoing role in the monitoring or reporting process? If not, who should undertake this role?</p> <p><b>Response:</b></p> <p>The Applicant notes that this question is directed to the UK Health Security Agency (UKHSA), however the Applicant considers that a response from the Applicant will help provide further clarification.</p> <p>In previous responses to written questions [REP4-068] (HAC.1.14) and responses to comments on written questions [REP5-052] (HAC.1.14), the Applicant has noted that it considers that evidence on the effects of noise on health and wellbeing is best established through large-scale, national studies and that such studies are not proportionate in the context of an EIA.</p> <p>The Applicant met with the UKHSA on 18 December 2023 and has issued a separate position statement at Deadline 7 in response to Issue Specific Hearing 8 (ISH8) Action 20: 'Applicant and UKHSA/OHID to meet to discuss possible health monitoring and an agreed position statement/ way forward' (<b>Applicant's Response to Issue Specific Hearing 8 Action 20: Position Statement on Health Monitoring [TR020001/APP/8.168]</b>).</p> <p>The Applicant's position remains as set out in the previous responses, referred to above.</p>

PINS ID	Question / Response
HAC.2.3	<p><b>Question:</b></p> <p><b>Errata</b>  The Errata document [REP5-036] states that Table 13.6 relating to the Study Area should be amended to delete ‘Areas within which there are likely to be environmental impacts (e.g noise and visual impacts of the airport, construction and surface access traffic routes)’ as a typological error. The ExA considers that the explanation that ‘Environmental impacts from the construction and operation of the airport are not relevant for the wider study area’ lacks an evidential basis. The Applicant must provide robust justification for this deletion cross referencing the original scope of assessment and explaining whether any agreement has been reached with stakeholders to scope out this matter from assessment. Where such justification cannot be provided, the Applicant should clearly explain how conclusions on such impacts have been factored into the assessment of effects.</p> <p><b>Response:</b></p> <p>The Study Area was based on a judgement of the likely geographic extent of impacts on health determinants. Aircraft noise was identified as an impact in the ‘wider’ Study Area (‘local’ and ‘wider’ Study Areas are defined in <b>ES Chapter 13 Health and Community [AS-078]</b>, paragraph 13.3.5). For other environmental impacts, such as noise from other sources, visual and air quality impacts, the likely extent of effects was judged by proximity to the source.</p> <p>The wider Study Area is approximately 1km from the airport boundary at its closest point and extends over a wide area including Luton, Hertfordshire, Central Bedfordshire and Buckinghamshire. It was considered that direct effects from the construction or operation of the airport would not be likely to occur in this area. Indirect environmental impacts from traffic movements on the wider road network were not identified as transport modelling was not completed at this stage and the location of potential effects could not be predicted. The Study Area remained under review throughout the assessment so that effects on health determinants, such as traffic, noise and air quality, identified by other topics outside the local study area could be considered where required.</p> <p>In their Post-Hearing Submission <b>[REP6-087]</b>, Buckinghamshire Council objected to the deletion of the text from Table 13.6 on the grounds that this would effectively scope out any consideration of impacts in this area. As described above, it was not the intention to scope out potential indirect environmental effects in the wider Study Area. Therefore, the text in Table 13.3 has been amended to delete the reference to ‘noise and visual impacts of the airport’, while retaining indirect impacts from construction and surface traffic access routes.</p> <p>It is noted that no indirect environmental effects were identified outside the ‘local’ Study Area in the course of the assessment and therefore no health effects are reported in relation to such impacts.</p>