

January 2024

London Luton Airport Expansion

Planning Inspectorate Scheme Ref: TR020001

Volume 8 Additional Submissions (Examination)

**8.168 Applicant's Response to Issue Specific Hearing 8 Action
20 - Position Statement on Health Monitoring**

Infrastructure Planning (Examination Procedure) Rules 2010

Application Document Ref: TR020001/APP/8.168



The Planning Act 2008

The Infrastructure Planning (Examination Procedure) Rules 2010

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

**8.168 APPLICANT'S RESPONSE TO ISSUE SPECIFIC HEARING 8
ACTION 20: POSITION STATEMENT ON HEALTH MONITORING**

Deadline:	Deadline 7
Planning Inspectorate Scheme Reference:	TR020001
Document Reference:	TR020001/APP/8.168
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Version	Date	Status of Version
Issue 1	January 2024	Additional Submission – Deadline 7

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1 INTRODUCTION

- 1.1.1 This document has been prepared by Luton Rising (a trading name of London Luton Airport Limited) ('the Applicant') for submission to the Examining Authority ('ExA'). It provides the Applicant's response to the ExA's Action Point 20 from Issue Specific Hearing 8 (ISH8) **[EV15-013]** held on 29 November 2023:

"Applicant and UKHSA/OHID to meet to discuss possible health monitoring and an agreed position statement/ way forward."

2 BACKGROUND

- 2.1.1 In its Statement of Common Ground (SoCG) **[REP2-019]** the UK Health Security Agency (UKHSA) recommended that a commitment for monitoring the health and quality of life of local communities affected by aircraft noise via social surveys should be made if the application is granted.
- 2.1.2 The Applicant has stated that monitoring health outcomes is not proportionate in the context of the Environmental Impact Assessment due to the practical difficulty of establishing causality, which would require a longitudinal epidemiological study, and the lack of feasible noise mitigation beyond the measures already proposed. The Applicant considers that studies to establish the effects of aviation noise on quality of life (annoyance and sleep disturbance) and the efficacy of noise mitigation are properly and best undertaken at national level, to inform national policy and guidance.
- 2.1.3 In Question HAC 1.14 of the Examining Authority's Written Questions (ExQ1) **[PD-010]**, the ExA requested that UKHSA *"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."*
- 2.1.4 The UKHSA responded to the ExA's Written Questions at Deadline 4 **[REP4-219]**. The response stated that standardised methods exist for monitoring annoyance and sleep disturbance caused by noise and that existing studies commissioned by the Department for Transport and Heathrow Airport Ltd could form a suitable basis on which surveys at Luton could be designed and deployed. The UKHSA suggested that monitoring could inform the rate of deployment of the noise insulation scheme, the geographical coverage of the scheme and whether alternative ventilation measures need to be provided.
- 2.1.5 This issue was discussed at ISH8 on 29 November 2023. The discussion included whether the suggested monitoring would be proportionate, the complexity of study design needed to provide robust evidence and avoid systematic errors resulting from, for example, the way health outcomes are reported by respondents, the potential for new surveys to undermine the results of existing studies, the arguments for airport-specific versus national level studies, and whether the results would inform mitigation.

2.1.6 The ExA identified the following action points:

- Action 17:
“UKHSA / Office of Health and Improvement and Disparities (OHID) to submit a copy of the Euston Station HS2 condition in relation to health monitoring.”
- Action 18:
“UKHSA/OHID to provide a suggested form of drafting regarding a potential health monitoring requirement.”
- Action 20:
“Applicant and UKHSA/OHID to meet to discuss possible health monitoring and an agreed position statement/ way forward.”

2.1.7 As requested by the ExA, a meeting was held on 18 December 2023 between the Applicant and UKHSA to discuss the possibility of an agreed approach to health monitoring. Despite further discussion, both the UKHSA and the Applicant’s positions remained unchanged and it was agreed that the respective parties stance on this issue was such that it would not be possible to reach an agreed position on this issue. For the purpose of responding to Action Point 20 at ISH8, it was agreed that each party would set out, for the benefit of the ExA, its respective positions. The Applicant’s position is set out below.

3 SUMMARY OF APPLICANT’S POSITION

3.1.1 The Applicant recognises that there is a strong link between aircraft noise and health and wellbeing, as set out in **Chapter 13 of the ES [AS-078]**.

3.1.2 The Applicant understands the value of evidence for the effects of noise on health and wellbeing and the efficacy of mitigation and considers that national studies are the proper means of obtaining such evidence. London Luton Airport is currently taking part in national studies on the health effects of aviation noise commissioned by the Department for Transport.

3.1.3 The Applicant is not aware of any precedent for undertaking monitoring of health outcomes through epidemiological studies linked to airport expansion projects, nor any requirement for development projects to undertake such studies to contribute to the cumulative body of evidence or inform future projects. The Heathrow study has been commissioned by Heathrow Airport Ltd to inform its Noise Insulation Scheme and is not directly linked to an application for expansion.

3.1.4 A study has been commissioned by HS2 Ltd on the mental health effects of construction noise on communities adjacent to Euston Station, due to high levels of exposure to noise and a lack of evidence on the health effects of construction noise. The Applicant considers that the noise arising from construction works at Euston is not comparable to aviation noise, where there is already strong evidence for health effects and established exposure-response functions.

- 3.1.5 The sample size within the areas affected by aircraft noise from London Luton Airport would be small for a health impacts study, which would reduce the likelihood of conclusive results. Survey response rates are generally low, and monitoring in relation to noise insulation would rely on respondents to answer two rounds of survey questions, before and after insulation. Data would be limited and biased to higher noise exposure. National studies provide data based on large sample sizes and are representative of the national population, so can be used reliably to inform noise mitigation policy and guidance.
- 3.1.6 The Applicant does not agree that existing studies form a basis on which surveys can be designed and deployed at London Luton Airport. The national studies referenced by UKHSA do not assess the effectiveness of noise insulation, which is the basis for the UKHSA’s request for monitoring at London Luton Airport. The Heathrow study will assess the effectiveness of insulation; therefore the Applicant considers that the appropriate approach is to await the findings from Heathrow and does not see a case for replicating this study.
- 3.1.7 The Applicant considers that, if complex, long-term epidemiological studies to monitor health outcomes are to be undertaken by individual projects, the potential value to the affected communities must first be demonstrated. Undertaking resource-intensive studies that do not have the clear potential to inform mitigation is not in line with the principle of proportionality in EIA monitoring.
- 3.1.8 The Applicant acknowledges the potential impacts of the Proposed Development but notes that the mitigation in place is commensurately scaled to deal with these impacts. The proposed pace of rollout of the noise insulation scheme is as fast as reasonably practicable to avoid significant effects and could not be increased in response to any survey findings. The Applicant considers that there is no clear scope for remedial action resulting from the findings of a study of effects on quality of life in the communities around London Luton Airport. As described in the **Chapter 16 of the ES [REP1-003]**, all reasonably practicable measures have been applied to reduce the impacts of noise.
- 3.1.9 Table 1 below considers the UKHSA’s request in terms of the requirements for monitoring set out in Regulation 26(3) of the EIA Regulations (2017) (Ref 1).

Table 3: Review of requirements of the EIA Regulations (2017) in relation to monitoring

Reg 26(3) of EIA Regulations (2017)	Consideration of Quality of Life monitoring
When considering whether to impose a monitoring measure under paragraph (1)(d), the relevant planning authority, the Secretary of State or inspector, as appropriate, must— (a) if monitoring is considered to be appropriate, consider whether to make provision for potential remedial action;	There is no clear scope for remedial action to reduce the effects of noise on quality of life for communities around London Luton Airport. As described above, all practicable measures have been adopted to reduce noise impacts resulting from the Proposed Development.

Reg 26(3) of EIA Regulations (2017)	Consideration of Quality of Life monitoring
<p>(b) take steps to ensure that the type of parameters to be monitored and the duration of the monitoring are proportionate to the nature, location and size of the proposed development and the significance of its effects on the environment; and</p>	<p>Monitoring effects on quality of life is not considered proportionate, based on the practical difficulties inherent in the design and implementation of an ongoing monitoring scheme, for which no tangible benefits, in terms of potential remedial action, have been demonstrated.</p>
<p>(c) consider, in order to avoid duplication of monitoring, whether any existing monitoring arrangements carried out in accordance with an obligation under the law of any part of the United Kingdom, other than under the Directive, are more appropriate than imposing a monitoring measure.</p>	<p>There is no legally required monitoring of Quality of Life outcomes that would duplicate the monitoring requested by UKHSA.</p> <p>The Applicant considers that studies conducted at the national level are a more appropriate means of obtaining reliable evidence to inform national noise mitigation policy and guidance than studies undertaken by individual airports.</p>

REFERENCES

Ref 1: Town and Country Planning (Environmental Impact Assessment) Regulations 2017. Available at <https://www.legislation.gov.uk/uksi/2017/571/contents/made>