

22 August 2023

Siân Evans
National Infrastructure Planning
Temple Quay House
2 The Square Bristol,
BS1 6PN

By Email Only: LutonAirport@Planninginspectorate.gov.uk

Dear Siân

REF: TR020001 - APPLICATION BY LONDON LUTON AIRPORT LIMITED FOR AN ORDER GRANTING DEVELOPMENT CONSENT FOR THE LONDON LUTON AIRPORT EXPANSION PROJECT:

WRITTEN REPRESENTATIONS MADE BY INSPIRED VILLAGES.

We write to you as Case Manager for the above project, specifically in reference to Principal Issues 1 (Air Quality and odour), and 7 (noise) as referenced in the Initial Assessment of Principal Issues (IAP) (section 88 of the PA2008) found at Annex C of the Rule 6 letter.

Inspired Villages have been notified via a letter from Luton Airport Limited in connection with the Development Consent Order application to double the capacity of the Airport which has now been submitted. The expansion of the Airport will lead to a significant increase in plane movements and the letter states that Inspired Villages Group could be entitled to compensation due to the development. Inspired Villages have been separately notified by the Planning Inspectorate in a letter dated 17 August 2023 regarding the examination timetable and forthcoming hearings.

Inspired Villages is developer and long term operator of specialist accommodation for older people in the UK. We are funded by Legal & General and NatWest Group Pension Fund and we currently have eight operational Integrated Retirement Communities (IRC), having opened two new sites in 2022 (Ledian Gardens, Leeds village in Kent, and Elderswell, Turvey in Bedfordshire).

Inspired Villages is due to open our ninth Retirement Community in Autumn 2023 at Millfield Green, located in Caddington Central Bedfordshire. Outline planning consent was granted for an Integrated Retirement Community of up to 200 units (Class C2) in January 2020 (Ref: CB/18/04602/OUT). Construction is underway for Phase 1 which received Reserved Matters consent in September 2020 (Ref: CB/20/01475/RM) for 86 units for older people. This new village will be located approximately 5.5km from the western most part of the runway at Luton Airport and is nearing completion with the first residents due to move into the village later this year.

We do not agree with the assessment of noise and have concerns regarding the mitigation measures proposed. As part of Luton Airport's expansion, the Airport has published airside noise contours within a

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Preliminary Environmental Information Report (PEIR). The contours have been based on upon aircraft movements for 2027, 2039 and for 2043 (Do-Nothing/Do-Something). Inspired Villages has commissioned InAcoustic, an Environmental Noise Consultancy, to review the airside noise contours in relation to Millfield Green Retirement Community

The noise contours are computed using the US Federal Aviation Authority's (FAA) Aviation Environmental Design Tool (AEDT). The PEIR also contains an inventory of the types/numbers of aircraft, arrival/departure routes and the potential change in aircraft technology/types that will have a lower noise profile (e.g. a reduction of Airbus A320 movements and an increase of A321neo movements but with a lower noise profile).

At Millfield Green Retirement Village, daytime noise levels are likely to increase between 1.8 and 2.1 dB for the 2027 and 2039 assessment years when comparing the Do-Nothing to Do-Something scenarios. For the night-time, the increases are likely to be between 1.4 and 2.7 dB for the 2027 and 2039 assessment years when comparing the Do-Nothing to Do-Something scenarios.

Clearly, the airport's expansion will increase noise levels at the development site by between 1 to 3 dB. Inspired Villages are concerned that the noise increase for residents will require mitigation going forward and question whether those who may not qualify for mandatory insulation as set out by Luton Airport Limited will be offered mitigation at a discretionary level as a consequence of the increase in noise levels at Millfield Green Retirement Village. The Noise Insulation Policy as set out in the Compensation Policy and Measures Report sets out only circumstances above the daytime 54dBLAeq,16h contour and outside the daytime 57dBLAeq,16h contour (Scheme 5). No other mitigation measures are proposed, nor any consideration given to relative increase in noise, opposed to baseline and future noise levels.

We wish to express our concern regarding the noise and air quality issues raised within the submission documents and request to be kept updated regarding the ongoing hearing procedures and forthcoming examination.

Please do not hesitate to contact me directly [REDACTED] [@inspiredvillages.co.uk](mailto:[REDACTED]@inspiredvillages.co.uk) / 07436 399 760) should you have any questions regarding Inspired Villages or the representations set out in this letter.

Yours Sincerely

[REDACTED]

Ellen Pearce
Inspired Villages

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