

Principal Areas of Disagreement Summary Statement (PADSS) From LADACAN (IP reference 20040757)			Version number: 2 Submitted as at: 12 Sep 2023	
#	Principal issue in question	Concern held	What needs to change / be amended / be included to address the concern	Likelihood of concern being addressed during Examination
1.1	Inflated baselines	2019 baselines were non-consented and are inappropriate 'DM' defaults	Recalculate 2019 noise baseline by removing non-consented movements	Feasible if instructed
1.2			Factor existing long-term noise reduction condition into recalculation	Feasible if instructed
1.3			Reassess other 2019 baselines if non-consented operations affected them	Feasible if instructed
1.4			Use adjusted 2019 baselines regardless of outcome of 2022 Inquiry	Feasible if instructed
2.1	Sharing the benefits	Industry has taken the benefits since 2014 without reducing noise	Rebalance the Application by focusing first on reducing noise and emissions	Feasible if instructed
2.2		Additional noise mitigations are available but not proposed as priority	Reassess all other available noise mitigations and prioritise achieving these before further capacity increases	Feasible if instructed
3.1	Reducing night noise	70% increase in night flights is not acceptable to impacted communities	Reduce the passenger and flight numbers to reduce night flights by 50%	Feasible if instructed
3.2		Night flights notoriously arrive late	Effective means to avoid late-running, including no late scheduled arrivals	Feasible if instructed
4.1	Noise insulation	Noise insulation is not fully effective mitigation	Extend coverage to include those with needs rather than limiting by contours	Feasible if instructed
4.2			Determine insulation required based on internal noise measurement not budget	Feasible if instructed

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4.3			Ensure before and after internal noise checks and quality assurance	Feasible if instructed
4.4			Properties to be eligible for upgrade if insulated under existing scheme(s)	Feasible if instructed
4.5			Implement professional advice on noise insulation for Park Homes	Feasible if instructed
5.1	Noise modelling	Disparities between modelled and measured spot noise values	Investigate and resolve disparities of more than 1.5dB(A) LASmax / SEL	Feasible if instructed
5.2		A321neo noise issue not resolved	Maintain A321neo modelled value at current measured level	Feasible if instructed
5.3		Long-haul aircraft not flown at Luton	Review basis for modelling next-generation and long-haul aircraft	Feasible if instructed
5.4		Model needs to be updated	Provide re-run contours and proof of equivalence between INM and AEDT	Feasible if instructed
6.1	Noise impact assessment	Impacts need to be reassessed	Reassess severity of impacts in light of revised contours	Feasible if instructed
6.2		No WebTAG assessment of harms	Provide WebTAG assessment of harms caused by noise at night	Feasible if instructed
7.1	Forecasts	Long-term noise reduction may not be achieved	Constrain noise contours to extent of currently consented longer term limit (as equivalent in AEDT)	Feasible if instructed

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8.1	Noise Envelope Design	Work of NEDG was curtailed before completion	ExA to advise whether this amounts to a breach of process	Unknown
8.2		Thresholds have been set too close to Limits	Revert to Thresholds at 85-90% of Limits as agreed by NEDG	Feasible if instructed
8.3		N-above contours de-emphasised	Restore to prominence agreed by NEDG	Feasible if instructed
8.4		Noise Envelope Design process did not adhere to CAP 1129 guidance	ExA to advise whether this amounts to a breach of process	Unknown
9.1	Green Controlled Growth	Lack of truly independent oversight	Make the ESG and Panel appointments process truly independent of Luton Council and the concessionaire	Feasible if instructed
9.2			Involve independent expertise in the reviews of GCG process	Feasible if instructed
9.3			Involve independent expertise in any mitigation planning	Feasible if instructed
9.4		Slow remediation of any breach	Redesign the remediation process to ensure breach rectified within 6 months	Feasible if instructed
10.1	Ecology	Protect Wigmore Park	Wigmore Park should not be built over, so reassess growth so as not to require a second terminal	Feasible if instructed
11.1	Climate change	Unexplained reduction in GHG budget	Reassess or explain why GHG emissions so much lower than in PEIR	Feasible if instructed

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11.2		Inappropriate reliance on Jet Zero as “policy”	Remodel pathways ensuring Jet Zero is only given weight as aspiration	Feasible if instructed
11.3		Over-reliance on carbon pricing	Remodel pathways to reduce reliance on carbon pricing	Feasible if instructed
11.4		Omission of modelling for non-CO ₂ impacts	Remodel and include the impacts of non-CO ₂ emissions	Feasible if instructed
12.1	Financial risks	Lack of clarity on development funding	Clarify how the development would be funded	Feasible if instructed
12.2		Over-dependence on airport revenue	Comply with instruction from DLUHC to reduce dependence on airport revenue	Feasible if instructed
12.3		Unresolved conflicts of interest	Resolve conflicts of interest between Luton Borough Council and Luton Rising	Feasible if instructed