Some Observations on the Noise Forecasts contained in the Documents Submitted by Leeds Bradford Airport in Support of their Planning Application (20/02599/FU)

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As context, it should be noted that paragraph 3.8.16 of the Environmental Impact Statement (located in "*FU-ES Volume 1 Chapter 03"*) makes it clear that LBA intend to take advantage of the proposed relaxation of restrictions on night flying "immediately upon grant of the planning permission". But the application makes no commitment to build a new terminal.

Regarding the relaxation of restrictions on night flying, LBA want to:

- abolish the existing restrictions on flights in the "shoulder" periods between 0600 and 0700 and between 2300 and 2330 (*page 8 of Appendix 10.7, located in "FU-ES Volume2 Appendices Noise and Vibration Part 3 of 4*),
- allow noisier planes to take-off between 2330 and 0600 (*page 9 of Appendix 10.7 indicates that planes with a noise "quota count" of up to 1.0 will be allowed to take-off during this period – the current limit is 0.5, thus the maximum certified noise allowed on take-off goes up from 89.9dB to 92.9 dB*),
- allow planes to land up until 1 am. if they are up to 90 minutes behind schedule (*page 9 of Appendix 10.7*), and
- abolish the existing cap on the <u>number</u> of noisy flights (87dB or above) between 2300 and 0700 (*see page 8 of Appendix 10.7*),

Although they are offering to operate an annual noise quota scheme which would limit the amount of noise emitted between 2330 and 0600, they are proposing that it be set at 1375 (*page 9 of Appendix 10.7*) which would allow the equivalent of <u>20 flights</u> (10 landings and 10 take-offs) by Airbus 320s <u>between 2330 and 0600 every night</u> during the 6 months of summer.

Although they are offering to report annually on their achievement of a target maximum level of noise during the day and night periods and to reduce the target for the daytime period, compliance would be measured at only 4 locations near the airport and there would be no penalties for exceeding the target (*page 10 of Appendix 10.7*).

Although they are offering to consider various ways of reducing noise nuisance, (*described in Appendix 10.7 from page 2 onwards*) the commitment is vague and the measures are examples of good practice which ought to be introduced even if permission to relax the restrictions on night flights were not being sought. Also, any mention of the main noise abatement measure currently in force (an injunction to avoid overflying the main built up area whenever possible), is conspicuous by its absence from the documents.

Although LBA claim that the new system they propose would be comparable with restrictions in place at competing airports, it is, in many respects, <u>less</u> restrictive than they are. For example, noting the main competitor airports they identify (*in Table 6.3 of the main document located in "FU Planning Report"*):

- Their main rival, Manchester Airport, has, in addition to its noise quota budget, a rule whereby the number night time operations must not exceed 7% of its total number of flights (LBA is expecting 17.5% of its flights to be at night- *see Table 10.4-8 which can be found in "FU-ES Volume 2 Appendices Noise and Vibration Part 1 of 4")*, and a ban on use of its new runway during night hours and a policy to reduce the area exposed to night noise below what it was in 2001.

- East Midlands Airport (LBA's second most important rival) have restrictions on noisy flights between 2300 to 0700 and impose fines on any operator who breaches the limits.

- Their third most important rival, Heathrow Airport, has, in addition to its noise quota budget, a cap on the total number of night flights allowed, and night time restrictions on use of its most sensitive runway (and, in their most recent consultation, they included the offer of a voluntary ban on all scheduled flights between 2305 and 0430).

LBA's consultants have predicted the amount of aircraft noise likely to occur with and without their proposals. In doing this they have assumed that, if their proposals go ahead, airlines will respond by operating newer, quieter, aircraft in and out of LBA *(a comparison of tables 10.4-7 and 10.4-8 in Appendix 10.4 (located in "FU-ES Volume 2 Appendices Noise and Vibration Part 1 of 4") shows that they are assuming that, if their proposals go ahead, many of the current fleet of Boeing 737-800s will be phased out).* Post-covid, this assumption looks very shakey - airlines are seriously short of cash and, rather than buy new planes, they may choose to keep their old ones in service or, if they need to expand the fleet, to pick up extra planes on the second hand market. Similarly, LBA's bankers may not allow them to go ahead with the new terminal and so the assumed stimulus which that would give to fleet modernisation may simply not happen. If the optimistic assumption about fleet modernisation proves to be incorrect, the average noise emitted will be significantly higher than the consultants have predicted.

Even with their optimistic assumption on fleet modernisation, their forecasts are alarming. They predict that, compared to the situation without their proposed development, their proposals would cause thousands more people to be subject to aircraft noise loud enough to have an adverse effect on them:

- an extra 2,600 people will be subject to at least 51dB (LAeq16hr), an extra 1900 to at least 54dB, an extra 700 to at least 60dB and an extra 200 to at least 60dB (*Table 10.21 in the noise and vibration chapter located in "FU-ES Volume 1 Chapter 10 Noise and Vibration"*).

- 26,100 more people will hear between 1 and 50 more planes which are loud enough to disturb them (above 65dB LAmax) on an average summer day (*Table 10.23 in the noise and vibration chapter*)

- 7,200 more people will hear between 50 and 100 planes loud enough to disturb them (above 65dB LAmax) on an average summer day (*Table 10.23 in the noise and vibration chapter*).

- 34,000 more people to be subjected to an increase in the amount of daytime aircraft noise loud enough to have an adverse effect on them (*Table 10.22 in the noise and vibration chapter*)

- 36,700 more people will experience night-time aircraft noise loud enough to have an observable adverse effect on them and 700 more people will experience significant adverse effects (*Table 10.24 in the noise and vibration chapter*)
- 123,000 more people will be exposed to an increase in night time aircraft noise at levels which have observable adverse impacts (*Table 10.25 in the noise and vibration chapter*)

Unsurprisingly, the consultants also indicate that these increases in noise will have adverse impacts on the health of people living under the flight path. (*in "FU-ES Volume 1 Chapter 13 Human Health"*)