

Dear Sirs

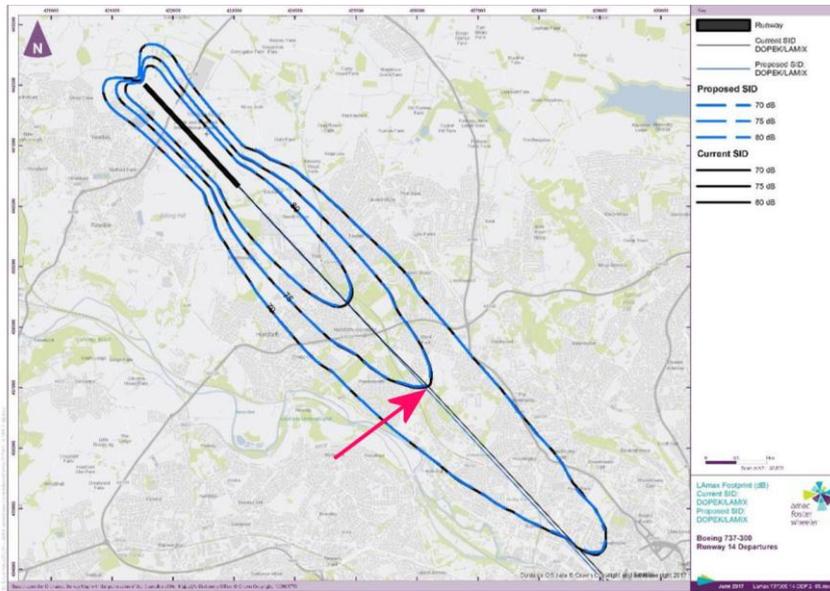
NWLTF is a consortium of Residents Associations (West Park, Weetwood, Drummond and Churchwood, Beckett Park, Far Headingley, and North Hyde Park) which, between them, represent much of the area under the flight paths to the south and east of the airport.

We have already contacted you, by email, regarding the Leeds Bradford Airport Airspace Change Proposal. Two contacts (on 16th October 2018 and on 11<sup>th</sup> January 2019) were in regard to our objection to the ACP and one, on 15<sup>th</sup> February 2019, was to request that the application be called in. Our 16<sup>th</sup> October communication detailed our concerns about the inadequacy of the consultation process and deficiencies in the evidence produced by LBA. We attach a copy of that communication for your convenience. Our communication of 11<sup>th</sup> January was to alert you to fact that, despite LBA's claim that it had continued to engage with local communities after the end of the formal consultation period, they were in fact continuing to ignore requests for information from communities to the south and east of the airport.

We are now contacting you with a further comment and complaint about the consultation process undertaken by LBA. Our previous more detailed comments and complaints still stand. This latest complaint has two components. Firstly regarding an apparent error in the LAm<sub>ax</sub> noise contours and secondly with regard to LBA's admission that some of its own consultation material was misleading.

1. Respecting the LAm<sub>ax</sub> noise contours; we have noticed that the distance between the 75Db and 70Db contours (as shown in Figure 6.3 of the Consultation Addendum and reproduced below as Figure 1) is inconsistent with the airport's statements about the height at which aircraft are flying. We have been told (in a meeting on 13<sup>th</sup> February) that departing aircraft pass over the Beckett Park campus at between 3500 and 4500 feet (this is consistent with our own estimate based on assumed climbs at 15° for the first 1200 feet and at 10° thereafter and suggests that aircraft will be at about 3543 asl [c3200' above local ground level] when they pass over the point marked with an arrow on Figure 1 below). If this is correct, the 70 Db contour should be about 4700 feet from the 75Db contour at this point (based on geometry and the amounts of attenuation expected in 3200 feet and in 5685 feet). However, in Figure 6.3, the contours are shown as being only 2400 feet apart. We accept that our calculations will not be precise but the difference between 4700 and 2400 is too great to ignore.

Assuming our calculations are broadly correct, there are two possible reasons for the difference. EITHER the contours are incorrectly positioned – in which case the consultation material was very misleading in respect of the LAm<sub>ax</sub> contours and, by inference may have been be equally misleading about the other indices of noise, OR aircraft are at much lower altitudes at this point than we have been led to believe (2400' of separation between the 75 and 70 Db contours suggests an altitude of about 1700' algl [c2400' asl] ) which cannot be acceptable at a point about a mile beyond the end of the designated PNR.



- Respecting the circulation of misleading information during the consultation period; several examples were included in our communication of 16<sup>th</sup> October but we wish to draw your attention to a further instance. In August 2017, the CEO of LBA provided the local MP, Alex Sobel, with a document and accompanying diagram purporting to summarise some aspects of the ACP (the document and diagram are attached for your information). This material was used to assuage residents' concerns about the impact of the ACP by highlighting the fact that departing aircraft would be taking off more gradually and using less thrust and would thus create less noise and use less fuel. However, in a meeting on 13<sup>th</sup> February 2019, two representatives of North West Leeds Transport Forum were told by LBA's Head of Air Traffic Services that there is no expectation that aircraft will climb more gradually and that the amount of thrust on take-off will be no less than it is now. He agreed that the document and diagram sent to Alex Sobel were "misleading". This admission further undermines the legitimacy of the 2017 consultation process (it will be recalled from our communication of 16<sup>th</sup> October that the assurances contained in the document sent to Alex Sobel were accepted at face value and caused many people not to attempt to engage seriously with the consultation process).

Another example of potentially misleading information may be found in section 7.1.1 of the ACP as described on the CAA website (*Proposal for Revised Airspace and Instrument Flight Procedures Document Ref 70818 40*) where it is indicated that "All departing jet aircraft are expected to fly within the NPRs up to 4000 ft". We had understood this sentence to imply that all departing jet aircraft would be expected to attain 4000 ft before leaving the NPR and were heartened by that because it would mean that departing jet aircraft would only be passing over the area beyond the end of the NPR at altitudes above 4000 ft. However, at a meeting on 13<sup>th</sup> February 2019, LBA's Head of Air Traffic Services stated that the expectation did not apply to aircraft leaving the NPR at its south eastern end. We do not suggest that sloppy text in Doc 78081840 will have affected the consultation but note that, if taken at face value, it might distort an assessor's impression of the situation at LBA.

Attachments: NWLTF objection Oct 2018 , LBA to Sobel 2017