

Leeds Bradford Airport : Planning Application No 20/02559/FU

Potential Conditions on any Grant of Permission (see explanatory note for justification)

The North West Leeds Transport Forum submitted a detailed objection to the Application on 10th July 2020. We remain strongly opposed to the Application and believe that it should be rejected outright. We note the opinion of the Civil Aviation Authority that restrictions on the number or nature of flights at individual airports are a matter for the Local Planning Authority rather than central government and urge LCC to use its powers accordingly.

However if, contrary to the arguments made by ourselves and others, LCC were minded to grant the application, we suggest, without conceding that anything short of outright refusal of the application is consistent with the climate change imperative, that some of the other negative aspects of the proposal could be ameliorated by means of the following conditions:

- 1) No terminal construction to begin until the following parts of the highway network have (at LBA's expense) been made safe for anticipated levels of traffic: Scotland Lane; the junction of Scotland Lane with Brownberrie Lane; Dean Lane and the junction of Dean Lane with Otley Old Road.
- 2) There shall be no expansion beyond 5 mppa without specific approval from the Local Planning Authority. Such approval to be sought by LBA when passenger numbers reach 4.5 mppa, and granted only if the LPA is satisfied that the local highway network can cope with the additional demand¹.
- 3) No terminal construction to begin until:
 - a) The feasibility and impacts of specified noise mitigation measures have been completed and independently assessed (steeper descent to runway 32; and improved Noise Preferential Routes and continuous climb as components of new airspace arrangements)
 - b) Specified noise mitigation measures are in place. Namely: (i) steeper descent to runway 32 (if beneficial); (ii) reduced daytime Target Noise Levels at the existing noise monitoring sites and at new sites either side of the main flight path some six kilometres distant from the airport, with achievement monitored and independently verified²; (iii) inclusion in the AIP of advice to all operators on low power/low drag approach procedures including later deployment of landing gear; (iv) public access to the Noise and Track Monitoring System; (v) imposition of non-trivial financial penalties on airlines breaching the specified noise limits or arriving behind schedule between 2330 and 0100 on more than one occasion per year and donation of such funds to approved charities operating in the area exposed to the noise; (vi) reporting on achievement of a night noise contour cap relating to the size of the exposed population (rather than to the square kilometrage exposed) and based on actual runway use data rather than a theoretical assumption about directions of take-off and landing, and independently verified² against data from the existing noise monitoring sites and at new sites either side of the main flight path some six kilometres beyond the end of the runway; (vii) reporting on achievement of, and on reasons for any failure to achieve, the existing

¹ This condition is based on the Section 106 Agreement which was a condition of the permission to extend the existing terminal [ref 18/06788/FU]. That agreement may not be enforceable since the permission to extend the existing terminal was not taken up and a further application has been made, but its provisions are as necessary now as they were in 2018.

² Monitoring and verification to be conducted by the Local Planning Authority or its agents but paid for and facilitated by LBA.

noise abatement procedure requiring use of runway 14 for landing and runway 32 for take-off whenever possible.

- 4) The existing maximum quota value for aircraft taking-off at night shall remain at 0.5.
- 5) There shall be a cap on the number of flight movements between 2330 and 0600³.
- 6) The annual Noise Quota Budget shall initially be set at 1375 or such lower value as makes it equivalent to that at Manchester airport pro rata to the number of flights at the two airports⁴.
- 7) The proposed Noise Quota Budget will be reviewed every five years and revised downwards to match any reduction in the average quota count of commercial aircraft in operating in the UK⁵.
- 8) Each aircraft's usage of the Noise Quota Budget shall be determined using the quota values given in S007/2020 (or its successor documents).
- 9) There shall be no removal or relaxation of existing restrictions on flights between 0600 and 0700 or between 2300 and 2330 until construction of a new terminal is complete.

EXPLANATORY NOTE:

Conditions 1 and 2 are designed to ensure that the adverse effects of increased surface access traffic are minimized.

Condition 3 is designed to ensure that noise mitigation measures are pursued and implemented effectively.

Conditions 4, 5, 6, 7 and 8 are designed to ensure that the positive aspects of the proposed introduction of a noise quota budget are not undermined by an increase in the maximum noise allowed on take-off and removal of a number cap, that the scheme is no less restrictive than that at Manchester, and that the potential benefits of technological improvements are locked-in.

Condition 9 is necessitated by LBA's decision to link a proposal to build a new terminal (which is welcomed in some quarters) with one to remove existing controls on flights during the morning and evening "shoulder" periods (whose impacts are wholly detrimental and which is overwhelmingly opposed). We believe that this latter element of the application should be refused outright but, if that

³ To match Manchester, this would be set at 7% of the number of commercial flights in the previous 12 months, would apply to all aircraft – including those with a QC value of 0.0, and no more than 70% of this total would be allowed during the summer period.

⁴ The 1375 figure is LBA's proposed by LBA in their Application documents.

⁵ As per suggestions in National policy documents which envisage progressive adjustment of quotas to reflect technological advances.

is not possible, we suggest that a condition such as this would prevent it from becoming the only outcome of the application⁶.

Submitted by NWLTF on 12th August 2020

⁶ *There is some scepticism as to whether, particularly, post-Covid, construction of a new terminal on the LBA site (with its numerous natural constraints) will appeal to investors and therefore a fear that, were the application to be granted without this condition, the applicants would take advantage of reduced restrictions on night flying but not actually deliver a new terminal building. (we note in Section 4.6 of the report commissioned by LBA from AAA, [in Appendix 1 of the Planning Report] that, when discussing LBA's competitive position vis a vis MAN, the analysts advise that LBA might benefit from the fact that MAN's landing charges were expected to remain high because of their ongoing capital expenditure programme. However, since the report was written, MAN have put much of their capital expenditure programme on hold – making it less likely that their landing charges will remain high and therefore more difficult for LBA to raise theirs to pay for a new terminal. Against this background it is less likely that LBA's owners will want to invest in a new terminal).*