

New Terminal Building and Change in Daytime Flight Regime at Leeds Bradford International Airport.

An initial critique by North West Leeds Transport Forum (NWLTF)

NWLTF have considered aspects of the pre-application in some detail and are concerned that, although described in the pre-application as a proposal to construct a new terminal and change the "daytime" flight regime, each of which sound innocuous and perhaps even desirable, the intention is to achieve a relaxation in the current restrictions on night flying and to put pressure on the highway authority to improve road access to the airport – both of which would help LBA's owners to expand their operations and increase the value of their asset even without a new terminal building.

In the limited time available, NWLTF have given particular consideration to four aspects of the proposal as set out in the pre-application – the implications for surface access, the issue of night time noise, the implications for the climate emergency and the claimed economic impacts.

Firstly, regarding **surface access**:

1. The pre-application places emphasis on an aspiration to maximise use of multimodal /low carbon access routes but, tellingly, LBA's Surface Access Strategy envisages continued increases in the number of parking spaces. **It is clear that LBA envisage that its development to result in increased road traffic.**
2. The originally proposed link road scheme has been cancelled, so how does LBA imagine that the very considerable increased number of road trips to/from the airport would be accommodated on the existing local highway network? (The location of the proposed new terminal will increase the amount of traffic seeking to use Scotland Lane and Dean Lane and, unless they are closed, this will increase congestion and reduce safety on these roads and also on Brownberrie Lane, Lister Hill, Low Lane, Long Row, Church Avenue, Church Rd, Fink Hill, Otley Old Road and Cookridge Lane). **Who would pay for the "improvements" that would be required on these roads and will the idea of a new road linking the airport to the A65 and to the A658 re-emerge?**
3. LBA would benefit if the new road being proposed to serve the "employment hub" near the airport were extended through to Whitehouse Lane. **Would LBA expect the Highway Authority to pay for this extension even though it would not otherwise be necessary?**
4. It is suggested that a new park and ride facility should be built on the Harrogate Leeds line near the Southern entrance to the Bramhope Tunnel rather than at the existing Horsforth Station – even though the latter would have a much larger catchment, could be served by feeder buses, could provide an enhanced service for residents of Horsforth and Cookridge and could have a dedicated link to the airport. **LBA prefer the Bramhope Tunnel site but why should its preferences prevail?**

Secondly, regarding the **changes to the "daytime" flying regime**:

5. Despite describing the proposal as a change in the daytime flying regime, the main consequence the proposed change would be to allow **more flights in the periods 2300-2330 and 0600-0700** and, additionally, unless the current cap on night time flights were reduced, **more flights between 2330 and 0600**. LBA's intention to increase the number and proportion of flights at night time is against a background of increased medical evidence on the harmful effects of aircraft noise (and of night noise in particular) and of increased public concern about the issue.

6. LBA state in the pre-application that the change is designed to remove one of its competitive disadvantages relative to other airports. In support of this, a table is provided which indicates that several other airports have a night time defined as 2330-0600. However:
 - a. Two airports conspicuously absent from the table are Robin Hood and East Midlands where, we understand, night time restrictions are defined for 2300-0700 (2200-0600 in summer at EMA).
 - b. LBA's main competitor, Manchester airport, has night time restrictions which are, in many respects more restrictive than those at LBA. For example: MAN's night time movements are restricted to 7% of their total movements whereas LBA's cap is equivalent to 11%; MAN include all flights in their calculation of night time totals whereas LBA do not; MAN do not allow unused night time numbers from one season to be carried forward to the next season whereas LBA does; MAN operate a cap on the noise-weighted sum of its night time operations whereas LBA does not; MAN monitor their night time flights to ensure that the area within the 60 dBLAeq contour is smaller than it was in 2001, LBA does not.

Thirdly, regarding **the climate emergency**

7. Although LBA state that they intend to respond to the Climate Emergency, their proposal to expand their operations would **increase** its annual carbon emissions from 200,000 to **400,000** tonnes by 2030.
8. Although LBA claim that, if it could attract more passengers who currently use Manchester, this would reduce emissions associated with surface access, this reduction would be all but wiped out by the increase in emissions due to the expansion in network coverage which would be required at LBA.
9. Although LBA say they will seek to offset some of its emissions, what is needed is not offsetting but a **reduction** in emissions to reach net zero by 2050 or earlier.

Fourthly regarding **economic and social impacts**

10. LBA claim that their expansion will benefit the regional economy but their analysis is incomplete. For example:
 - a. It ignores the environmental impacts such as increased noise, particulate emissions and road congestion which lead to reduced quality of life (and which, if monetised, would show as a cost to the regional economy);
 - b. It ignores the increased carbon emissions which, if properly included in the regional accounts, would require reduced economic activity in other sectors.
 - c. It ignores the consequences of the diversion of public funds into provision of infrastructure to serve the airport;
 - d. It ignores the negative impact on the regional economy due to holidays being taken abroad rather than locally; and
 - e. It ignores the potential contribution to the regional economy which might flow from alternative uses of the site.

We conclude that the pre-application was misleading in numerous respects and that it would be inappropriate for the Local Planning Authority to facilitate expansion of the airport by granting permission for the new terminal and the increase in night flying.

An application should not even be considered until there has been an independent assessment of all the costs and benefits, a comprehensive surface access study and meaningful public consultation. On the basis of what we have read in the pre-application we would suggest that the application to increase night flying should be rejected and any approval to build a new terminal should be conditional on LBA paying for the bulk of the cost of any enhancements to the local road network which become necessary.