

**NWLTF<sup>1</sup> comment in response to The Briefing Note provided for City Plans Panel members dated 10th August 2020 and subsequently posted on the planning portal.**

We welcome the publication of this note and commend its attempt to explain some of the technical information and terminology involved in the application. We fully understand that the document was not intended to offer any opinion on the merits, or otherwise, of the application. However we do have some observations on that part of the document which deals with aircraft noise. In particular we think it would have been useful to draw the attention of the Plans Panel members to the following facts:

1. The Applicant's own analysts refer to "*the relatively low number of noise monitoring terminals at the airport*" with which to validate the predictions – which signals the fact that the predictions by the noise model predictions may be less accurate than they would have wished.
2. The Applicant's noise predictions for 2030 are based on the pre-Covid assumption that, as a consequence of the development, airlines would operate newer, quieter, aircraft at LBA. Were this not to happen the amount of noise post-development would be greater than predicted.
3. The Applicant is seeking permission to allow noisier planes to take off at night than are permitted under current restrictions (the Briefing Note mentions that the proposed maximum QC at takeoff would be 1.0 but does not point out that the current maximum is 0.5 – see comment 13 below for further detail).
4. The predictions for the 'without development' scenario are based on the contested assumption that, under current planning conditions (07/02208/FU), there is no limit on the number of some classes of aircraft allowed operate between 2300 and 0700. If, as has been argued by NWLTF and others, this is not a correct interpretation of the current Conditions, the amount of night-time noise in the 'without development' scenario will be much reduced and the increase in night-time noise due to the development would, accordingly, be much greater (see also comment 14 below).
5. The Applicant is seeking removal of all controls over the number of flights during the morning and evening shoulder periods (0600-0700 and 2300-2330) and states that, post-development, the number of flights during these shoulder periods would effectively be limited by the existing runway and taxiing procedures. However it should be noted that their Masterplan ('Route to 2030' – published in 2017) includes proposals to extend the existing taxiways and that, were they to do this, the number of flights during these periods could be increased beyond the levels assumed in the Environmental Statement – with obvious implications for noise and emissions.
6. The Applicant is proposing that flights between 2330 and 0600 would be subject to an annual cap on the sum of the quota counts of aircraft operating at LBA during this period. However they are proposing that the cap be set at 1375 which, when adjusted for the relative sizes of the airports, is less restrictive than that applied at Heathrow or Manchester.
7. A key element of the control of night noise at Manchester and at all the London airports is the use of a cap on the number of night flights in addition to the cap on the sum of their quota counts. The Applicant is seeking to have no such cap on the number of night flights at LBA. There would, consequentially, be no means of preventing a very significant increase in the number of night flights at LBA (for illustrative purposes it can be demonstrated that, if all night-time operations were by aircraft with a QC of 0.25, the quota count cap of 1375 would

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<sup>1</sup> North West Leeds Transport Forum - a group comprising 10 Residents Associations in North West Leeds

allow 5,500 night-time flights at Leeds per annum – significantly more than the 4000 allowed under the current Conditions. Similarly, if all night time operations were with the latest generation of planes with a QC of 0.125 the number would be 11,000.) The numerical cap on night flights at Manchester - LBA's main competitor - is set at 7% of total (24 hour) operations.

8. The effectiveness of the proposed Night Period Noise Contour cap would be increased if it related to the population (rather than the square kilometrage) exposed to the specified amount of night noise.
9. Manchester is one of several airports which operate a scheme under which airlines which breach the local noise limits are fined – with the fines going into a fund devoted to local community welfare. The Applicant has declined to consider implementing such a scheme at LBA despite being asked to do so by LCC officers.
10. The development would lead to a substantial increase in aircraft noise over a large swathe of Leeds from Stourton and Belle Isle in the south east, via Woodhouse, Burley and Headingley to West Park and Horsforth in the north west.
11. The UK's *Aviation Policy Framework* (2013) expects the industry to minimise the demand for night flights and puts a requirement on them to minimise noise impacts and particularly those associated with night flights. The proposed relaxation in night flight restrictions at LBA clearly runs counter to this.
12. By granting permission for the development and thus allowing increases in noise, air pollution and adverse health impacts, Plans Panel members could be said to be acting counter to:
  - the *Noise Policy Statement for England* (which expects adverse impacts on health and quality of life to be mimimised);
  - Leeds' *Health and Wellbeing Strategy* and its aspiration to be the 'Best City for Health and Wellbeing'; and *National Planning Policy Framework (NPPF) guidance* which indicates that planning decisions should 'prevent new development from contributing to.....unacceptable levels of....noise pollution'.

We assume that these issues will be brought to the attention of the Plans Panel before they are asked to make a decision on the Application.

Among the wealth of useful technical information provided in the Briefing Note, there are, unfortunately, two instances of misleading information:

13. Line 6 of the penultimate page states that the current conditions allow night time departures by aircraft of QC 1.0. In fact the maximum, as specified in condition 4 of 07/02208/FU, is 0.5.
14. Line 5 of the final page repeats the Applicant's claim that aircraft with a QC of less than 0.5 do not count towards the current night-time movement restriction and that the airport can therefore fly an unlimited number of the latest generation of aircraft at night. In fact, under conditions 6a and 6b of 07/02208/FU, the only aircraft permitted at LBA between 2300 and 0700 are those landing with a QC of 0.5 or 1.0 on arrival and those with a QC of 0.5 on departure. Conditions 6c and 6d allow the Local Authority to give special permission for other aircraft to operate during these hours but, under Condition 7, these would count towards the annual numerical cap. Condition 6e would allow an unlimited number of flights by exempt aircraft but CAA documents indicate that this exemption only applies to jet aircraft of less than 11,600kg – and cannot therefore apply to commercial aircraft such as the A320neo or the B737max.