

**Objection to Leeds Bradford Airport planning application:
Plans Panel West 16th February 2009**



Introduction	Anthony Rae: Friends of the Earth, and representing the campaign opposing the major expansion of Leeds Bradford Airport. As chair of Y&H environmental transport organisations: member of LBIA Surface Access Forum; member of Regional Transport Board. Regional stakeholder in DfT 2003 White Paper process.
box1	We are NOT objecting to the proposal to provide a redesigned terminal with improved facilities for passengers, and a better gateway to the city of Leeds and its region.
box2	It's now accepted that the application IS about the major expansion of the airport - 70% in just four years. This rate of growth is not supported even by the 2003 Air Transport White Paper; and it will have substantial adverse impacts because it is excessive. This application is the <u>only</u> opportunity for the LPA to control or condition those impacts, for the next decade or ever.
box3	Climate Change impacts: planning permission would result in the airport <u>on its own</u> generating more CO2 than the entire Leeds Climate Change Strategy 2050 target. The requirement of the statutory development plan to produce a sustainability appraisal to consider these impacts has NOT been met; a permission would therefore be vulnerable to challenge.
box4	Surface Access impacts 1: At the planning threshold of 5mppa <u>1M additional car trips</u> would be generated a year, <u>after</u> allowing for improved public transport. All agree that important junctions on the LHN are already at/approaching capacity; their position would now worsen significantly, but no improvements are proposed. Important impacts eg Scotland Lane have been ignored.
box5	Surface Access impacts 2: The proposed 'mitigation package' - improving 'sustainable access to the airport' instead - will be inadequate because the increase in bus passengers will be dwarfed by many more new car trips. There is no evidence that it will be effective in responding to the problems identified in the TA. There is no prospect of a new rail or road fixed link. Consequently UDP policy T30 has NOT been complied with; nor has RSS T6 A5.

box6	Noise impacts: A likely increase of around 20,000 flights p.a (around 50 a day in peak periods of the year) has not been disclosed. Possible increases to daytime noise levels or noise disturbance have been ignored. An analysis based on PPG24 Annex 3 should have been undertaken.
box7	Recommendation 1: The application should either be refused, or more reasonably deferred, so that the requirement of the statutory development plan (RSS policy T6 A3) to provide a sustainability appraisal can be complied with - to then be considered by the Panel.
box8	Recommendation 2: At the same time the deficiencies in the assessment of surface access and noise impacts can be responded to. LBIA and its Surface Access Forum should be instructed to produce a surface access strategy that responds to the scale of passenger growth impacts, and the short timescale, associated with the application.
box9	Recommendation 3: The conclusions of report para. 10.25 that the 2003 White Paper & LBA masterplan 'support further growth of LBIA', and that 'the proposal accords with Development Plan/ RSS policies ...T6 and UDP policies ... T30' are not secure without significant qualification.
box10	Recommendation 4: The Panel should request officers to investigate the benefits of setting an ATM limit for the airport (established Government practice elsewhere) in order to provide the LPA with an effective mechanism for managing and controlling future adverse impacts.
box11	Conclusion: This planning application represents the ONLY and probably the last opportunity for the LPA to require that future activity at Leeds Bradford Airport over the next decade(s) contributes to the sustainable development of Leeds and its community; and specifically the last opportunity to control and manage a number of clearly demonstrated adverse impacts of the huge expansion proposed by the airport operator. The RSS T6 sustainability appraisal is the right tool to establish this framework. To at least defer the application so that the seriously adverse impacts can be resolved is completely compliant with the development plan. To approve it, on the other hand, would not be.