

Consultation comments from Friends of the Earth Yorkshire and Humber



Subject: APPLICATION 08/06944/FU

TWO STOREY EXTENSION TO MAIN AIRPORT TERMINAL BUILDING TO PROVIDE NEW ENTRANCE, IMPROVED INTERNAL FACILITIES AND ASSOCIATED LANDSCAPING WORKS TO THE TERMINAL BUILDING FORECOURT AT LEEDS AND BRADFORD AIRPORT, WHITEHOUSE LANE, YEADON, LEEDS, LS19 7TU.

1. These are the final comments of Friends of the Earth on this planning application, based on our review of the planning officers' report published on 7th April 2009; of the revised 2009 Transport Assessment in combination with the 2005 Transport Assessment very recently made available to us; and other related documents. In them we respond to the analysis of the planning issues in the officers' report and consider the material grounds for approval or refusal of the application.
2. We emphasise firstly that the objections submitted by us, by the coalition of environmental organisations, and many other members of the public – which now far outweigh supporters of the development - are **not** 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 – as discussed in paragraph 10.26-33 of the report.
3. Instead the objections are to the scale of the expansion in passenger numbers being proposed by the airport company, and which the new terminal will facilitate, and the several severe and substantial impacts that will be the consequence. The nature of these concerns is set out from paragraph 6.6 onwards of the officers' report and we are grateful that these have been recorded.

Scale of expansion

4. This is discussed in sections 10.5-10.12 of the report. From their time of acquisition the private airport company made clear their intentions to expand passenger numbers at a rate much faster than that supported by the Air Transport White Paper 2003 (see May 2007 press release [here](#) announcing their intention to attain the White Paper 2030 passenger totals by 2015). At the same time their consultation for this planning application has been careful to disguise that intention. At the meeting of Plans Panel West in February councillors on the committee expressed their concern about the possibility of expansion, and its problems for sustainable surface access (see our note of those comments in the Appendix).
5. The officers' report now makes it clear that growth of **over 70% in just four years** is planned *paragraph 1.9 and 10.3-4* As the report comments: "The current planning application will not determine whether 5mmpa throughput is reached by 2012 or 2016." Rather, since the application is the only opportunity for the local planning authority to manage the consequences of possible future growth (combined with the stated intention of the operator to achieve this, and then to continue growth beyond that level), the requirement is for a decision as to whether growth on this scale is supported by the planning framework, and can be accommodated without adverse impacts.
6. This point is made despite the fact that growth at the airport had already started to plateau in 2008, before going into a substantial decline in November 2008. In the last four months passenger numbers at the airport have dropped by 19% over the same period in 2007 CAA, and if this level of reduction were to continue throughout 2009 (say at a reduced rate of 15%) then traffic would fall below 2.5 million passengers per annum. What this tends to highlight is the gap

between current and medium-term economic realities on the one hand, and the aspirations of the region's new private airport operators (in a situation where the growth forecasts of Doncaster airport to 2030 are, to a quite extraordinary degree, even more 'aspirational').

7. It is accepted that a substantial level of growth at Leeds Bradford airport is supported by the 2003 White Paper, but it is important that the qualifications associated with that support are also identified:

"This level of growth could lead to a small increase in the number of people affected by noise, and every effort should be made to mitigate and minimise these impacts. Improvements to both public transport and road access to the airport may also be required in the medium term as passenger volumes continue to grow."

"Subject to these points, we would support the further development of the airport as set out above [The airport will handle around 2mppa in 2003 and is forecast to grow to around 7mppa by 2030; and additional terminal capacity], and we invite the local planning authority to safeguard for the runway extension should the airport operators bring forward such proposals through their airport master plan." *ATWP 8.37-38*

8. Paragraphs 10.5-12 of the report deal with the the issue of the scale of growth, and amount to an interpretation by the Council's officers, of the framework provided by the ATWP 2003 and airport masterplan, that supports the airport's intention to 'take almost all the growth at the start' of the period to 2030. Whatever the theoretical justification for endorsing that approach (by arguing for example that those two documents are "not prescriptive as to the rate of growth within these parameters"), as a way of managing airport expansion in a planned and responsible way it is simply not credible. As Friends of the Earth pointed out in February: "By taking even more growth in the early years of the ATWP period to 2030 – at a rate that is in excess of 10% p.a for the years to 2003-12 - annual growth for the remaining 18 years would then have to be limited to just 1% p.a - not 3.5% as the airport have stated - to keep within the ATWP supported limit of 7mppa."

9. Instead a more considered interpretation would be that the 2003 White Paper does indeed provide support for major expansion at almost all UK airports – subject to the consequential impacts being responded to - but that this planning application proposes a level of growth that goes very substantially beyond that, and also beyond its own master plan. This means in turn that the adverse impacts of growth will also be exacerbated.

10. The report also makes the mistake of translating a growth forecast into a 'target': "The current application will deal with existing operational difficulties within the terminal but will also assist LBIA achieve the masterplan forecasts growth to 5 mppa throughput by 2016." *10.36* We submit very strongly that it is not the purpose of the local planning authority to assist a private company to achieve its own-generated growth targets and business plan, particularly when the consequences of that growth are to produce substantial adverse impacts, that are not just environmental but economic as well.

11. By far the greatest proportion of the proposed expansion in passenger numbers at the airport are outbound UK low-cost and discretionary leisure passengers, which has resulted in a 'tourism deficit' (the difference between the spend of outbound and inbound leisure passengers) at Leeds Bradford airport of nearly £400 million in 2008; and still increasing to over £750m by 2015 if Bridgepoint's growth plans are met. This is expenditure extracted from the Leeds and regional economy; the increase in the tourism deficit would be sufficient to support very large numbers (14,000 FTE) of jobs in Yorkshire's tourism industry.

The consequences for climate change

12. These are considered in paragraphs 10.13-23 of the report, which after examining recent pronouncements concludes that: "It is considered that the issue of climate change is not something which is a determining factor in respect of this current terminal extension application" *paragraph 10.21*

13. Friends of the Earth would make three comments about the treatment of climate change in this section:

(i) By previously endorsing the airport's intention to 'take most of its growth early', the report also sanctions an even faster increase in the climate change emissions generated by flights from the airport without regard for the consequences of so doing. The report does not cite the most recent official statement, by the Committee on Climate Change of December 2008 about the treatment of aviation emissions - "International aviation and shipping should not be included in [carbon] budgets [set by the Climate Change Act], but there need to be clear strategies to achieve emissions **reductions**" - reductions, that is, not increases *page 21 PDF* An analysis undertaken by Friends of the Earth from government figures indicates that growing emissions from the airport exceed on their own the emissions target for the city (1.21m tonnes) for 2050 established in the Leeds Climate Change Strategy due to be approved by Full Council next week (22nd April). This would be as a consequence mostly of the expansion to be sanctioned by this planning application.

(ii) Attempts to emphasise the claimed sustainability of certain features of the application are misplaced. For example, that the sustainability performance of the new terminal building will be improved *10.16*; or that expansion in flights from Leeds will reduce the emissions from the surface access journeys to Manchester *10.22* The report is obviously not aware that 95% of all emissions associated with air travel, including surface access journeys to/from airports, are generated 'air side', and that therefore any reduction in the 5% of surface access emissions will inevitably be overwhelmed by growth in the 95% of emissions generated by growth in the route network and frequencies at Leeds Bradford airport to attract passengers back from Manchester.

(iii) We submit that, whilst the conclusion of paragraph 10.21 may reflect judgments made elsewhere, it appears to have overlooked an essential requirement of the Leeds development plan relating to climate change. **Policy T6 Airports** of the adopted Regional Spatial Strategy states that:

"**A** The following considerations should apply to airport development and expansion proposals: ...

3. Fully meets the principles of sustainable development as demonstrated through a sustainability appraisal setting economic and social benefits alongside local and global environmental impacts, and protects the integrity of internationally important biodiversity sites "

14. It will be noted in paragraph 8 .9 of the report that this requirement of the statutory development plan is only set out in a shortened form: "Fully meets sustainable development principles;" and that in doing so it merely copies the submission of Bridgepoint's consultant's (White Young Green) in their Planning Statement at paragraph 4.5.6 Both therefore appear not to have identified the requirement to produce a sustainability appraisal that demonstrates particular effects.

15. Friends of the Earth submits that it is accepted that the current planning application constitutes an 'airport development and expansion proposal', and that whilst the decision not to undertake an environmental impact assessment appears to have been properly 'screened', it also follows that what might have been a substitute for the sustainability appraisal required by policy T6 has also not been undertaken. We also understand that a sustainability appraisal has not been undertaken. Finally it is very clear both from the words of the policy and the context surrounding

their inclusion within successive versions of RSS, that the reference to 'global environmental impacts' is a specific reference to the climate change consequences of aviation emissions.

16. The 2004 Planning and Compulsory Purchase Act sets out a development plan framework which gives equal weight to the Regional Spatial Strategy and the local development plan. Where the RSS is more up-to-date than the LDP (which is the case in Leeds: May 2008 compared to July 2006) then more weight should be given to RSS.

17. The **RSS policy T6 A3** requires a process to have been undertaken, which to the understanding of Friends of the Earth it has not been. It follows therefore that the planning application is not in line with development Plan policy.

18. Because it is a process policy, and because an assessment of sustainable development in the terms of this particular policy has not been undertaken in the absence of an environmental impact assessment, it is not possible for the local planning authority to reach a reasoned judgment about it and to determine the application in accordance with this policy.

19. Because the officers' report has previously endorsed the airport's approach to excessive growth, it has thereby also exacerbated the consequences for climate change emissions, which it has then ignored, contrary to policy.

20. Friends of the Earth has been advised that a decision to approve the application made without this sustainability appraisal would consequently be vulnerable to challenge. We draw this point explicitly to the attention of the local planning authority; although the matter is actually referred to obliquely in paragraph 6.10 of the report as well, and at 8.6.

The consequences for surface access

21. These are considered in paragraphs 10.34-44 of the report, which are in turn derived from the revised 2009 Transport Assessment which has to be analysed in conjunction with the 2005 Assessment – both of which we have reviewed. The two assessments have a consistent analysis: that a number of junctions on the local highway network around the airport are already under pressure or at capacity (in 2005 and 2008); that those pressures will be increased by general forecast traffic growth and as a result of committed developments already possessing planning permission; and that the proposed expansion of the airport will add to those pressures still further, but to a lesser extent.

22. Thus this situation applies to: A660/ A658 Dyneley Arms junction (section 9.4 of the 2009 assessment); A658 / Otley Old Road junction section 9.5; A658 / Bayton Lane junction section 9.7; St Margarets Road / Station Road junction section 9.9

23. We will use the first of these as an illustration. So paragraph 9.4.4 states that "the results showed that the junction currently operates at capacity with queues forming on all approach arms"; 9.4.7 "Table 9.2 shows that the junction currently operates at or over capacity in both the AM and PM peak periods"; 9.4.8 "Table 9.2 compares the 2012 without and with additional airport traffic scenarios ... The results show that in the AM peak the junction is predicted to operate over capacity on the A660 Leeds Road, A658 Pool Bank North and South approaches without the addition of additional airport traffic. The addition of airport traffic is predicted to slightly increase queues on approaches that are at/over capacity".

24. The characterisation of 'slightly' increased use as a result of adding airport growth traffic is that of the Airports own traffic consultants; in fact the increases are often significant in terms of further reductions to PRC (practical reserve capacity).

25. In proceeding to then identify potential mitigation the Airport's transport consultants summarise that: "It is evident that the highway network within the vicinity of the airport is generally currently congested during the morning and evening peak hours, with the operation of certain junctions predicted to worsen with assumed traffic growth up until 2012". They then make observations about the coincidence of airport traffic flows in relation to those peaks; and then that: "The level of impacts cannot be physically mitigated for at junctions within the study area without a large-scale improvement scheme which is not commensurate with the level of impact of the [airport] development traffic. It is evident that LCC have no plans to improve the highway network, therefore LBIA cannot contribute to schemes to mitigate the additional traffic." Consequently they conclude that: "It is proposed to improve sustainable forms of transport at the airport with key improvements in public transport services" *paragraphs 10.4.1-3*

26. The officers' report first notes correctly that the airport has been required to prepare its transport assessments on the basis of potential growth up to 3.8 and then 5 million passengers p.a even though it may be the case that such forecasts might not be achieved for some time (as we have noted above in relation to the current downturn). Nonetheless, as we have stated above, the LPA is required to make its judgment about the acceptability of such potential growth at the time of this facilitating planning application, because it will not have a subsequent opportunity to manage the consequences of that growth should it actually arise. The report concludes at paragraph 10 .40 that: "These assessments demonstrate that the highway network is constrained with 3.8mppa at 2012, which is made worse with 5mppa at 2012. The consequences of these assessments are not acceptable without mitigation to the highways authority."

27. We believe this judgement to be correct, and therefore the issue turns to the effectiveness, and the extent of, the proposed approach to mitigation; and also the potential to introduce thresholds or triggers to manage the widening gap between actual passenger numbers and their potential forecasts at some future date. The report already engages with the latter point in its proposed conditioning; see BP3 & 4 of paragraph 10.42 which introduce trigger points at 3.8 and 5mppa thresholds.

28. But before we consider the evaluation of surface access issues in the officers' report, there are two points we should note:

(i) Firstly that **the 2009 Assessment has not been comprehensive, in that it has ignored the well known problems on Scotland Lane**. These were the identified at length in the 2005 Assessment (see paragraphs 4.2.5, section 5.8, paragraphs 6.16-18, and finally 8.15 which stated: "It is predicted that without action to reduce this use [21% of current airport traffic] then traffic on Scotland Lane will increase proportionately to the growing passenger throughput".

Beyond an attempt to downplay the allocated forecast traffic flows on Scotland Lane (see paragraphs 3.3.1 and 6.2.1-3; although that position is then contradicted by the same consultants approach in their draft travel plan, which has traffic via Scotland Lane at 18%), the 2009 Assessment simply ignores the consequences of significantly higher traffic levels on this route – as predicted by the 2005 Assessment - and what needs to be done to prevent this. This inconsistency of approach cannot be acceptable.

(ii) Secondly that **the TA hasn't identified the absolute number of increased car trips between 2008 and 2012**, which are approximately as follows:

<i>Mode of surface access</i>	<i>2008 approx no. of passengers using mode</i>	<i>2012 approx no. of passengers using mode</i>	<i>Increase per annum</i>
Public transport – bus	175,000	500,000	+325,000 passengers by bus
Cars + taxis/private hire	2.7 million	4.5 million	+1.8 million passengers by car
<i>Or</i>			+ 1 million car/taxi/PH trips *

* For conversion factors from passenger to car trip numbers see original 2009 TA table 5.7

29. What this table makes clear, which neither the Transport Assessment or the officers' report does, is that this scale of expansion in passenger numbers will result in a huge increase in the absolute number of passengers still accessing the airport by car/taxi/private hire, amounting to approximately **one million extra car trips per annum at the 5mppa level**. It is almost certainly the case as well that the proposed increase in bus passengers simply cannot be achieved in practice – this would require 4 annual patronage increases of nearly 30% each year, which is unheard of.

30. The inescapable conclusion from these figures is that an increase in public transport mode share to 10% - whether achieved or not - will be completely overwhelmed by the parallel much large increase in car trips, and that consequently a mitigation package that was based just on this alone would be a wholly inadequate response to the development plan requirements of UDP policy T30.

31. Returning then to the officers' response to the findings of the 2009 Assessment, the report first of all accepts its analysis about the impact upon particular junctions and the inability to mitigate at those junctions. It then: sets out the particular mitigation package proposed in discussion with the airport, which is focused on improvements to public transport and travel planning *paragraph 10.42*; then provides in *10.43* the following positive endorsement of that package -

" The package commits LBIA to a substantial financial contribution in excess of £2 million (not including the land for tram train) and focuses on improving public transport patronage to the airport. It releases substantial funds at critical points in the growth of the airport and accommodates links between passenger growth, revenue generation, vehicular impact, and modal shift. The triggers for the release of financial contributions are based on vehicular impact and modal shift, which are the correct 'planning triggers' to assess the impact of the airport and at the same time will provide a considerable incentive to the airport to promote public transport patronage. Whilst the detail is still being finalised officers' do consider that the package does offer an acceptable way forward which will enable the airport to develop but at the same time protecting the position on the local highway network and ensuring that increased patronage of public transport is pursued with rigour by all parties."

... and then finally *10.44* assesses its relationship to the planning framework and particularly UDP policy T30, in the context that mitigation up to 3.8mppa has already been provided by a previous planning application. The conclusion is that:

"The highways authority could only support the proposals as submitted if it is

considered that the public transport/highway improvements mitigation up to 5mppa, proposed by LBIA, are sufficient to avoid detrimental impacts on the highway network. This mitigation would need to facilitate an increase in public transport modal share targets (10%). Proposals for mitigation from traffic generation trigger mechanisms have been submitted and discussions are continuing but it is considered that in principle there is a mechanism now in place which by the use of annual reviews could enable the project to proceed." *our emphasis*

32. The mitigation package proposed for this planning application comprises the following:

- three improvements agreed as part of the section 278 previous approval of the car park extension (4.2.1 2009 TA); approximate value £500,000
- conditioned support for the main bus services to the airport: £ 228,000. This is what the airport already pays via Metro, but will now be legally obliged to continue. Only the proposed £50,000 contribution to the York bus service will be new and additional.
- £60,000 contribution to City Council for monitoring activity
- dedication of land for tram train link
- two further financial contributions of £500,000 each when airport passenger numbers reach 3.8 and 5mppa respectively.

33. So, with the exception of the small amount of funding for monitoring and the £50,000 one-off payment for the York bus service, there will be no further mitigation, or financial contribution thereto, until passenger numbers exceed 3.8mppa, and then only £500,000 up to a passenger number threshold of 4.9mppa – 2mppa more than the current level.

34. The questions to be asked therefore are: whether the proposed mitigation package is going to be adequate to respond to the extent of surface access problems created by expansion towards 5mppa; and whether the proposed mitigation approach - by 'an increase in public transport modal share targets' to 10% - will actually work, and where is the analysis to support this? Here the numbers in paragraph 30 above are crucial.

35. Specifically: is this approach supported by a Surface Access Strategy prepared and improved by the Airport Surface Access Forum - the purpose of which is designated in **RSS policy T6B** as follows: "... Air Transport Forums should implement surface transport initiatives to ensure that access is less car dependent".

36. This is the specific mechanism required to challenge and then supervise the implementation of such an approach. **RSS policy T6 A5** provides some further assistance: "... Making best use of existing transport infrastructure (including travel plans for managing surface access, minimising generation of car-borne traffic and reviewing airport parking charges); and wherever possible improving or providing new access by public transport". The emphasis on improved access by public transport is also supported by the **RSS policy T9** transport investment and management priorities.

37. These forums work according to guidance prepared by the Department of Transport; they must prepare a Surface Access Strategy which should set out '**challenging** short and long-term targets for increasing the proportion of journeys made to the airport by public transport' *paragraph 18*; and importantly in relation to RSS policy T6 A5 the guidance states: "Parking is likely to be a **key element in managing demand for car use and ASAS should set out how parking strategies might encourage motorists to use public transport to the airport**, whilst recognising that many people will continue to choose to use their car." *our emphasis Guidance paragraph 27*

38. So the question - of considerable importance for judging the adequacy of the proposed mitigation package - therefore becomes: Has the Leeds Bradford Airport surface access strategy set 'challenging short and long-term targets' for increased public transport use to mitigate surface access impacts up to 5mppa in the short-term to 2012, and does it include a parking strategy intended to manage demand for car use?

39. We submit that the answer to both of these questions is: **No, it does not** (and the author of these comments has been a member of the Airport Surface Access Forum since its inception). There is no copy of the existing Surface Access Strategy available for inspection/evaluation for the purposes of this planning application. The Surface Access Forum was due to consider a revision of the strategy at its meetings in October 2008 and March 2009, but on neither occasion was a draft strategy submitted so that the Forum could fulfil its designated task. This is due to the failure of the airport operator to meet its responsibilities.

40. A Travel Plan dated March 2009 has been provided to Friends of the Earth by the local planning authority in connection with this application but it is important for the LPA to understand that this document has not been scrutinised by the Surface Access Forum, and consequently not much weight can be attached to it. And yet in general we would comment that: its measures are small-scale and will only act at the margin; that it only applies to employees rather than the combination of passengers and employees; and that its good intentions are rather contradicted by section 6.11 which indicates support for the 'improvement' of the Leeds Outer Ring Road and the provision of a specific airport road link, which will have the opposite effect of encouraging sustainable access.

41. The reality, underpinning the particular assessment of the surface access consequences of this planning application, is that **the airport does not have an adequate surface access strategy that integrates and resolves the consequences of its very considerable growth aspirations**. As was grudgingly understood by the Forum at its meeting in March 2009, there is no prospect of either a fixed road or rail link being funded or provided to the airport before 2020, if ever. In that situation, and with the inability of individual bus services to respond to the increasingly extended network of origins/destination trip ends encouraged by the airport low-cost offering, its *de facto* surface access strategy is reduced to generating ever-increasing numbers of car journeys onto the local highway network, encouraged by increasing provision of surface level parking. This was exemplified by the 2005 permission to increase airport parking by 2200 spaces. Consequently it is not surprising that chapter 7 *Parking* of the 2009 Transport Assessment concentrates solely on factors associated with additional provision, and not on 'managing demand for car use'. The surface access forum has never discussed or considered any proposals on this topic.

42. To summarise the over-complex position on surface access to the airport (over-complex because it has not been resolved with an adequate strategic framework):

- rapid expansion of the airport towards 5mppa would result in additional car trips of around 1 million being generated onto the local highway network by 2012.
- the 2009 Transport Assessment identifies that important junctions around the airport are already at capacity, with increasing pressures to come as a result of planning permissions already approved by the LPA in fulfilment of strategic objectives. No mitigation to the highway network directly is proposed, therefore an assumption has had to be introduced that mitigation will be obtained elsewhere (proposals 'to improve sustainable forms of transport at the airport with key improvements in public transport services'.)
- the proposed mitigation package provides a mechanism for the triggering of an additional financial payment of only £500,000 before the airport exceeds the 5mppa thresholds, but does

not provide evidence that either the general problems of capacity across the local highway network, or specific problems at locations such as Scotland Lane, can or will actually be responded to adequately. Even if payment is triggered, there is no analysis to demonstrate that what it will purchase will provide sufficient mitigation.

- the situation has come about because of the failure of the airport to provide an adequate Surface Access Strategy compliant with government guidance, and which genuinely seeks a resolution between the airport operator's growth ambitions and the problems of accommodating evermore surface access without the benefit of fixed link public transport. There is therefore no guarantee in strategy that the improvements in the sustainable forms of transport required by the mitigation package can be delivered.

43. Friends of the earth submits that, whilst the 2009 Transport Assessment and the mitigation package proposed in response represents an attempt by the City Council to begin to understand and then respond to the airport ever-increasing surface access dilemmas, the approach proposed is deficient in a number of respects, and specifically: the scale and type of mitigation response (which should have required much greater emphasis on managing access by car, using parking charges as the appropriate mechanism); and in its failure to respond to particular problems on the local highway network such as those on Scotland Lane. **For this reason it cannot be accepted by the local planning authority as compliant with its development plan and policy T30.**

44. We also believe that the proposed mitigation package is not compliant with the requirements of the UDP policy T30, which talks about: "Provision will be made for the continued growth of Leeds Bradford airport subject to improvements to transport **infrastructure**" *our emphasis* See also the particular terms of paragraph 6.6.5. Infrastructure implies either physical measures or substantial improvements to sustainable capacity, and these are not being provided.

The consequences for noise

45. It has been noted above that the Air Transport White Paper identified qualifications to its support for growth at the airport relating to noise; those qualifications have been omitted in the statement of the White Paper policy set out in paragraph 8.1 of the officers' report. There is no analysis of noise impacts as they relate to the scale of growth proposed by the airport, and the endorsement given by it to the airports' 'take almost all the growth early' approach.

46. This is a significant omission, because with a 70% increase in passenger numbers, comes an approximately equivalent increase in the number of air transport movements. This can be illustrated from the DfT 2009 Forecasts which record 40,000 ATMs in 2005 and a forecast 73,000 for an assumed central forecast passenger level of 6mppa in 2030 - that is, just 1m below the airport's proposed growth level of 5mppa in 2012. According to the Airport Masterplan, ATMs were expected to increase from the level of 30,000 ATMs in 2004 to approximately 50,000 ATMs in 2016 (to deliver 5.1 million passengers, so the equivalent of the current application levels).

47. The LPA must understand that this application is implicitly consenting to an increase in air transport movements in the order of 20,000 per annum, with a very large margin of error. Friends of the Earth thinks it is unacceptable that Leeds Bradford Airport has not provided adequate or any information on this issue with the application, and that Leeds City Council has not sought to evaluate the noise impact thereof. A further consequence of the 'take almost all the growth early' approach is that more air transport movements will be undertaken in the early years of the planning period with noisier aircraft; and an allowance was probably included in the DfT modelling for the 2003 White Paper to build-in the introduction of quieter aircraft in later periods as an assumption. Without this it may well be that the White Paper noise qualification would have been stronger.

48. The LPA will be aware that noise is a material issue for determining this application; PPG24

refers. Friends of the Earth cannot provide an expert comment on the relationship between ATM increases and noise disturbance; and this will not be a linear relationship.

Conclusions

49. It will be seen from the above that it is the **scale of the proposed expansion of the airport** that is the issue with which the determination of this planning application has to engage, in a reasonable and balanced way, in that it is the scale of the growth which **is the 'driver' for the consequential climate change, surface access and noise adverse impacts**. This is particularly the case given the extraordinary extent of the growth for which permission is being sought: to 5mppa in just the four years to 2012, with the subsequent intention of proceeding to 7mppa by 2015 - double the rate of growth supported by the Air Transport White Paper.

50. That the application is proposing significant expansion is now accepted by the officers' report, despite the applicant's attempt to disguise the entire issue, vindicating the concerns expressed by the Panel about the possibility of expansion in February.

51. We submit that the report's analysis of each of these components is deficient:

- In relation to the **scale of the proposed expansion**, its interpretation has sought to downplay the extent to which the levels of growth sought by the Airport are significantly outside and beyond those supported by the Air Transport White Paper 2003. Since that White Paper was itself favouring expansion, the approach proposed by the officers' would be to effectively permit a free-for-all in growth at every airport location in the country.

- In relation to consequential **climate change impacts**, we have pointed out that the requirements of the development planning framework have not been met RSS policy T6 A3, which results in serious climate change consequences being ignored and not balanced in the decision by the committee.

- In relation to **surface access impacts**, whilst the 2009 Transport Assessment and the mitigation package proposed in response represents an attempt to begin to understand and then respond to the airport's ever-increasing surface access dilemmas, the approach proposed is deficient for the reasons identified in paragraphs 30, 33 and 43 above.

- In relation to **noise impacts**, the application and the officers' report has simply ignored and almost certain equivalent major expansion in air transport movements, which will have some impact on noise disturbance.

Recommendations

52. **Firstly** we submit that the absence of the sustainability appraisal required by RSS policy T6 means that the current application is defective and cannot be approved as it stands. This means that it must either be **refused** or, more reasonably since this is a deficiency of process, **deferred** pending the production of the sustainability appraisal *in the terms established* by policy T6; and then returned to the Panel for substantive consideration.

53. Since understanding of the significance of the contribution of aviation to the UK's carbon budget has increased markedly since the first adoption of that policy (see the several reports of the Tyndall Centre for Climate Change Research undertaken for Friends of the Earth), and in view of the recent pronouncements of the Committee on Climate Change within the context now set by the Climate Change Act 2008, it is imperative that Leeds City Council require the undertaking of this sustainability appraisal to the standard that meets the enormous challenge of responding to and avoiding dangerous climate change. To do anything otherwise would be deeply irresponsible. **As the local planning authority for a district containing a major airport use the Council**

must be seen to uphold the adopted planning framework in this regard.

54. **Secondly**, that in this resubmission to the Panel, the application and evaluating report of the LPA should respond to the deficiencies in the assessment of surface access and noise impacts identified above; and should also require Leeds Bradford Airport and its Surface Access Forum to produce a surface access strategy for the airport that responds to the scale of impacts, and the short timescale, associated with this application - all within the framework set by the Department for Transport guidance on the surface access strategies, and RSS policy T6 A5.

55. **Thirdly**, that the conclusions of paragraph 10.25 on the principle of supporting the extension of the terminal: "It is considered that the Air Transport White Paper and the airport masterplan support further growth of LBIA and acknowledge the need for additional terminal capacity. It is considered that in principle the proposals will improve the competitiveness of the airport, will generate direct and indirect employment and will reinforce the role of the airport as a key gateway to Leeds and the wider region. The proposal is in line with the strategic objectives of the Council through the Vision for Leeds. In terms of the Development Plan then the proposal accords with RSS policies YH1, E1 and T6 and UDP policies SA4, SA6, T30 and T30a provided that any growth is considered in parallel with the implications arising from access and transportation issues."

... are not secure in that: (i) contrary to what is stated, the proposal does not accord with RSS policy T6 in an extremely important respect (subpolicy A3); that it is misleading in terms of economic impact ('generate direct and indirect employment') in that it does not take account of the very substantial negative tourism deficit associated with airport expansion; and that 'the implications arising from the access and transport issues' have not yet been adequately resolved.

56. **Fourthly** that in order to provide the local planning authority with an adequate mechanism to manage the impacts of substantial or unrestrained air traffic growth, and its consequential climate change surface access and noise adverse impacts, the LPA should consider setting an air transport movement (ATM) limit on the number of flights to be permitted at the airport, by way of a condition to a permission. This is established practice: for example an ATM limit has been set for Heathrow, and by the Secretary of State when approving the opening of Doncaster airport in 2003 (condition 3). In that case an ATM limit of 31,304 was set until end 2007; 44,571 to end 2011; and 56,918 thereafter.

57. The officers' report is of the view that there should be 'an acceptable mechanism and package for dealing with growth' 11.4. Friends of the Earth does not believe that the proposed very indirect response to surface access impacts alone provides a sufficiently extensive mechanism, and recommends that the LPA seeks further advice on the setting of an appropriate ATM limit - capable of appropriate variation over time - as part of the process of assessing the overall sustainability of the proposed major expansion of Leeds Bradford Airport.

Consequently, we request either that the application be deferred for substantive reconsideration by the Panel in due course; or that it be refused as deficient.

Appendix: Councillor comments at Plans Panel West meeting on 19th February, 2009

Councillor Matthews: Climate change was a real issue for this application. "We need a clear reassurance from the airport that this is not a first step towards massive expansion." "What are the airport going to do about sustainable transport access?" Councillor Chastney said he agreed with his colleague about the climate change and sustainable transport issues.

Councillor Yeadon: "I would have a real problem if the purpose of this application is to facilitate more flights at the airport".

Councillor Andrew: "Better public transport is a crucial issue, and that using private hire vehicles to get to the airport is not the transport policy we want. The airport is not doing enough".

Councillor Leadley said that the transport approach at the airport was not adequate, but that this application was not about expansion but rather "just to tidy up what is already there".

Councillors Taggart and Campbell said that the airport needed a rail link if access was to be sustainable. "This problem has to be grasped" said Councillor Taggart.

Summing up, Panel chair Councillor Campbell stated: "We are not discussing a proposal to expand flights or passengers at the airport".