

City Plans Panel

11th February 2021

Leeds Bradford Airport Application
(Supplementary Information)

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Addendum Report of the Chief Planning Officer

CITY PLANS PANEL

Date: 11 February 2021

Subject: PLANNING APPLICATION 20/02559/FU

Adjustments to the existing "airside" apron including demolition of existing passenger pier and ancillary accommodation, earthworks and site remodelling at the existing eastern parcel of the Airport apron to accommodate a new terminal building and forecourt area;

A new terminal building and passenger piers;

Construction of supporting infrastructure, goods yard and mechanical electrical plant;

Relocation and extension of existing fuel storage tanks;

Hard and soft landscaping including biodiversity works;

Associated infrastructure/utilities, including drainage;

Reconfiguration of existing car parking, and new car parking provision in the vicinity of the Viking car park. The provision for a new 'meet and greet' building and separate parking inspection building.

Additional car parking above the existing provision on site will only be provided if future assessments show there is a need. Additional car parking over the existing level would be phased and its delivery would be controlled through a planning review mechanism;

New and modified vehicular (and pedestrian/cycle) access from Whitehouse Lane, including improved access for bus and coach to the new terminal building;

New bus terminal and taxi drop off facilities to the front of the new passenger terminal; and Modifications to flight time controls to reflect current noise guidance, and to extend the daytime flight period

– At Leeds Bradford Airport, Whitehouse Lane, Yeadon

APPLICANT

Leeds Bradford Airport Ltd

DATE VALID

4th May 2020

TARGET DATE

12th February 2021

Electoral Wards Affected:

Otley Guiseley and Yeadon

Yes Ward Members consulted

Specific Implications For:

Equality and Diversity

Community Cohesion

Narrowing the Gap

MEMBERS ARE REQUESTED TO NOTE THE RESPONSES

1. Introduction

This addendum is to report to Plan Members any additional representations that have been received between the main Panel report being published and the expiry date of the advertisement of the Additional Environmental Statement (ES) . The site notice and press advert for this expired on the 4th February 2020

2. Public response

Since the report was published, there have been a number of comments submitted. These are two comments that relate to the additional environment statement whilst the rest relate to the planning application itself. Most of these have already been addressed in the officer report. For those that have not been previously addressed, officer comments are in italics

Imran Hussain MP has objected stating

- The increase in passengers will result in significant, detrimental environmental impact on air quality across the whole of West Yorkshire region
- Contradict the commitment made by West Yorkshire and the UK to reduce carbon emissions to tackle climate emergence
- Climate emergency driven by increased carbon emission including from air travel is the biggest if not greatest danger threatening our planets future.
- Recent decision by management of LBA regarding compulsory redundancies despite support packages can't see how LBA can continue to make a case for expansion

The matters relating to impact on the climate have been addressed in the climate change section of the report starting at paragraph 204 onwards and recovery of the airport has been addressed in the economic benefits of the report starting at paragraph 165.

GALBA have submitted three further objections concerned with the following matters

- Concerned that date for comments is after the panel report has been published – *this is the reason for this additional addendum*
- Doesn't comply with development plan in terms of policy SP12 as adverse environmental impact and local impacts – *addressed in report from paragraph 139 onwards*
- Doesn't comply with paragraph 148 of NPPF - *addressed in report this relates to a low carbon future and impact on climate change starts from paragraph 204 onwards*

- Economic benefits have been overstated - *addressed in report from paragraph 165 onwards*
- Serious flaws in the ES – *officers consider the ES is sound and robust with its findings referred to throughout the report*
- The additional ES statement has broad brushed the slightly lower without development scenario - *this is dealt with from paragraphs 252 onwards*
- LBA statement that modern aircraft will be operated over the night time is unevidenced so no weight can be attached - *officer to comment verbally at Plans Panel*
- Council and Plans Panel taking wrong approach to climate change in that climate change and GHG emissions are matters for national government and not for the Council. *This is addressed in the policy section from paragraph 92 onwards and the climate section from paragraph 204 onwards*
- There is an underestimation of the GHG impact with ES being deeply flawed - *officer to comment verbally at Plans Panel*
- Potential clawback not relevant and no robust evidence is provided *addressed in report*
- The Climate Change Committees recommendations have not been taken into account
- Non CO2 emissions and radiative forcing need to be taken into account *addressed in report from paragraph 204 onwards*
- Position statement stated that international aviation will be dealt with via CORSIA which is wrong *addressed in report from paragraph 204 onwards*
- In terms of surface access the policy does not comply with policy SP12 *addressed in report from paragraph 144 onwards*
- Impact on health has been overestimated - *officer to comment verbally at Plans Panel*
- Impact on human rights and social injustice as only 15% of UK population take up 70% of all flights which is highly correlated within income and 52% of the population do not fly – *The report shows that the development will improve social inclusion from paragraph 330 onwards*
- Existing extension is not a fallback position – *the extension planning consent is still in time so could be built so it is a fallback position*

The following matters need further consideration by officers who will provide Members a response verbally at Plans Panel

- The summer season months of April to September are incorrect as they should be British Summer Time this results in forecasts of how many flights per day can fly, how many flights are in breach and how many should be deducted for their sensitivity test are incorrect
- Original ES states there will be 20 planes per night by 2030 without development which contravenes the current night time cap by more than 6 flights per night
- Differences within the further information provided on 7th and 21st December regarding predictions of number of planes at night time
- Noise differences in the predicted flights are wrong
- Adjustments must be recalculated using a realistic fleet mix of quieter and noisier planes
- Errors in the estimates for winter flights
- Predictions of fleet modernisations are not justified
- Claims that ‘modern’ planes are significantly quieter than current plans is not always true
- If planes are quieter and have less quota counts it will significantly increase the number of planes that can fly overnight which will have a noise impact
- Commonly accepted by ICCAN and WHO that noise events not overall noise average causes harm to health
- Failure to quantify the effect of these changes in GHG

- The application was not advertised correctly in terms of advertisement within newspapers circulating in the locality. *The application has been advertised 3 times within the Yorkshire Evening Post which complies with the relevant legislation*

North West Leeds Transport Forum (NWLTF) have submitted one further objection concerned with the following matters

- Concerned the report does not deal with the conditions were consider would be necessary if the application was approved which are
 - o Removal of restrictions between 06:00-07:00 and 23:00 to 23:30 should be delayed until the terminal is open so that they can't commence the overwhelming unpopular and deleterious part of the application until they proceed with the more nuanced aspect – *there is a condition that the airport cannot expand beyond 5mppa to cover this matter*
 - o The introduction of a QC quota for night flights should be accompanied by a numeric cap on night time flights – *there is no need for a numeric cap as night time flights are controlled by number of passengers and QC quota*
 - o The existing restriction on maximum QC value of aircraft departing at night should be retained ie 0.5 rather than 1 – *the proposed mitigation measures have been established using the QC value of 1*
 - o Penalties should be imposed for non-compliance with noise restrictions. – *there will be a mechanism for monitoring noise restrictions with enforcement measures available if they are breached*
- The seriousness of the surface access issues which follows expansion is being downplayed with solutions being over optimistic about the potential shift to public transport – *addressed in the report from paragraph 188 onwards*
- Applicants assertions of what might occur if the application was not granted are grossly misleading and the ES does not provide a safe basis for making a decision – *this has been addressed in various sections off the report*
- Contribution to the railway station fall way short of what is required – *the scheme public transport modal shift to 10% does not include the railway station and if the station comes on line this will provide an additional 5% shift*

ShIPLEY Town Council object to the scheme stating

- Impact on climate change
- At odds with Leeds City Council Climate emergency
- Impact off noise especially increase in night flights
- Impact of air pollution on health

These matters have already been raised by objectors and are addressed in the report

New Economics Foundation have objected

- Proposed scheme will subject local, national and international public to unacceptable levels of socioeconomic and environmental risk – *general comment*
- Consider claims that the economic case for expansion would represent an economic benefit to both Leeds and LCR and will have a substantial positive impact on the economies of Leeds and LCR creating jobs are supporting objectives in Leeds Inclusive Growth Strategy are highly misleading and irresponsible. – *the City Council has taken its own independent advice regarding the economic aspects of the proposals, and within the context of this, officers disagree with this conclusion*
- In reaching their conclusions they have disregarded or ignored the following

- Proposed expansion has not been addressed at the appropriate appraisal geography with regional assessment evidence base incomplete and unfit for decision making – *advice given to officers from Volterra state that the LCR is acceptable for the study area*
- Appraisal not been addressed at a national appraisal geography as it's the only way that the policy recommendations of the UK Climate Change Committee's advice on aviation can be met – *Climate change issues are not within the scope of the economic benefits*
- Significant downwards revisions to claimed business productivity benefits should have been made with international shift towards online communication technologies seen during pandemic reduced need of air travel – *Volterra report 'acknowledges that British Airways have since withdrawn its Heathrow service from LBA. Whilst this could potentially reduce the productivity benefits associated with the development, this is likely to be partially offset by the anticipated expanding of services to Amsterdam Schiphol Airport, another of Europe's major hubs. Furthermore it could be argued that business travel may never bounce back following the COVID-19 pandemic and hence productivity benefits associated with this type of travel could be overstated. Volterra considers that business productivity estimates to be still valid for the following reasons:*
 - *The OE relationship is based on how easy/difficult it is to access an area which will not change because of the pandemic*
 - *IATA and DfT forecasts do still predict that business travel will bounce back in the next few years and*
 - *Whilst total business trips could be expected to reduce longer term, the higher value business trips which are more important economically are likely to be the ones which will still continue to occur even in a future scenario where business trips are generally reduced*
- Significant downward revisions to claimed direct employment and economic impacts should have been made due to recent declines in employment in aviation due to pandemic – *in terms of Covid impacts Volterra consider the findings of the further report to be robust. Whilst there remains considerable uncertainty around the scale and persistence of economic benefits resulting from the pandemic, the two year delay is reasonable given previous bounce backs of LBA and the IATA forecasts that air travel will bounce back to pre COVID levels by 2023*
- Significant negative impacts of outbound tourism disregarded – *quantifying outbound tourism is an extremely complex issue. For these reasons, Volterra continues to conclude that NEF only present partial analysis on the impact of outbound tourism rather than the full picture, focusing explicitly on a claimed quantifiable disbenefit. Volterra would therefore be reluctant to include this within the central economic impact assessment estimate*
- Key inconsistency in the economic case regarding what will happen to job intensity of the airport site after expansion – *In the peer review, Volterra concluded that the direct employment estimates produced by both consultants used commonly accepted methodologies. However the estimates of the applicant were considered to be more robust as their method was able to take account of local particulars while the approach favoured by NEF relies more on national averages which often ignore local characteristics*
- Significant potential negative carbon impacts are not factored into the analysis as carbon emissions on inbound flights are not included in the economic case. – *this is outside of the Volterra scope*

There have so far been 14 letters of objection concerned with the following matters which have all been addressed in the report

- Impact on climate
- Impact on GHGs
- Impact on global heating
- There should be an economic trade off against the environment
- Concerned airport been flouting existing night time flying regulations
- Funds for LBA expansion would be better used for improving public transport infrastructure
- With new ways of working and technologies the need for travel is decreasing
- No need for larger airport can use Manchester if needed

There have so far been 17 letters of support commenting on the with the following matters which have been addressed in the report

- Vital to local economy and rejuvenation of aviation industry which has been crippled by the pandemic
- Import for the airport to grow
- Improvements to transport network and provide opportunities for people
- Improve connections with Yorkshire and the world
- Airport can serve more destinations
- Environmentally friendly terminal

One general comment

- It will boost the local economy and support more jobs

3. Conclusion

Members are requested to note the above representations and officers comments