

Report of the Director of City Development

Report to: Development Plan Panel

Date: 11th September 2012

**LDF Core Strategy – Publication Draft, Analysis of Consultation Responses:
Policy SP12 ‘Managing The Growth Of Leeds Bradford International Airport’.**

Are specific electoral Wards affected? If relevant, name(s) of Ward(s):	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
Are there implications for equality and diversity and cohesion and integration?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
Is the decision eligible for Call-In?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
Does the report contain confidential or exempt information? If relevant, Access to Information Procedure Rule number: Appendix number:	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No

Summary of main issues

1. The Core Strategy Publication Draft was subject to 6 weeks public consultation during February – April 2012. Section 3 of this report summarises the issues raised and the Table in Appendix 1 suggests how the City Council should respond. Appendix 2 illustrates how the text of the Core Strategy would need to be altered.
2. Of the wide range of issues raised in SP12 ‘Managing the growth of Leeds Bradford International Airport’ (LBIA), 1 major change and 1 minor change have been proposed.

Recommendations

Development Plan Panel is requested to:

- i). Endorse the analysis of the issues raised and any suggested Core Strategy text changes (as detailed in Appendices 1 and 2 to the report) for presentation to Executive Board for approval.

1.0 Purpose of this Report

- 1.1 Within the context of the Core Strategy Initial Report of Consultation (6th June), the purpose of this report is to review consultation responses in relation to SP12 'Managing the growth of Leeds Bradford International Airport'. Appendix 1 attached, summarises the representors, key issues raised, the City Council's view and proposed action. Appendix 2 illustrates how the text of the Core Strategy would need to be altered.

2.0 Background Information

- 2.1 Following consideration by the Development Plan Panel and Executive Board, a 6 week period of public consultation has been undertaken, commencing on 28th February to 12th April 2012. Consistent with the LDF regulations, this is a targeted stage of consultation, with emphasis upon requesting responses in relation to the "soundness" of the plan. Within this context, the consultation material comprised of a range of documents, which were subsequently made available on line or as paper copies, including:

- Core Strategy Publication Draft (Main Document)
- Sustainability Appraisal (& Non Technical Summary)
- Habitats Regulations Assessment Screening
- Equality Impact Assessment Screening
- Draft Infrastructure Delivery Plan
- Draft Core Strategy Monitoring Framework
- Health Topic Paper
- Report of Consultation on Preferred Approach (October – December 2009)

Links were also incorporated to the consultation web pages to the evidence based material, which has been prepared to help inform the emerging document (including the Employment Land Review, Leeds City Centre, Town and Local Centres Study, Housing Growth in Leeds, Strategic Housing Land Availability Assessment, Strategic Housing Market Assessment and the Leeds open space, sport and recreation assessment.

3.0 Main Issues

- 3.1 The representations received with regard to SP12 were polarised, with regard to the expansion of the airport, and the mitigation of environmental impacts. Following the analysis of the consultation responses to SP12, this report recommends a major change to SP12 (i) and a minor change to SP12 (iv). These changes have been outlined in Appendix 2.
- 3.2 The representations were grouped into the following themes; airport growth, surface access to the airport, airport car parking and airport environmental impacts. A summary of the representations is given below, Appendix 1 attached, summarises the representors, key issues raised, the City Council's view and proposed action.

3.2.1 Airport Growth;

- There was general support for SP12 enabling airport growth, however, there should be firmer support for the airport's expansion.
- Leeds, York and N Yorkshire Chamber of Commerce raised concerns that the expansion of the airport was tied to infrastructure delivery with no recognition of how it would be delivered nor by whom.
- Taylor Wimpy put forward the representation that with LBIA as a key economic driver, there is a need to match economic growth opportunities with the provision of homes.

3.2.2 Surface Access to the Airport;

- LBIA outlined in their representation that surface access requirements will form part of any planning application, and it is therefore not necessary or reasonable for the growth of LBIA to be contingent on a Surface Access Strategy.
- LBIA also raised concerns regarding the implication that the growth of the airport cannot be sustained without improved connectivity. These major infrastructure proposals are supported by LBIA, however these are longer term objectives, which can only be delivered by a partnership of stakeholders including LBIA. The assertion is that airport's growth is not and should not be contingent on their delivery.
- Leeds Civic Trust suggest that the Surface Access Strategy should have a primary aim of improving public transport access and that a new link road would be contrary to this.
- There was general support for the airport Tram Train link, together with representations from both Harrogate Borough Council and Bradford Metropolitan District Council regarding the details of the scheme.

3.2.3 Airport Car Parking;

- LBIA made the representation that co-ordinated management of car parking should be addressed within the Core Strategy, and that the development of car parking to serve LBIA should be contained wholly within the AOLB, and should be prohibited outside of the AOLB.

3.2.4 Airport Environmental Impacts;

- LBIA raised concerns regarding references to the impacts of air travel on climate change within the Core Strategy, as well as SP12(iv) 'The management of any local impacts and implementation issues', due to the lack of explanation on how this will be interpreted or applied.
- Concern was raised by the Leeds Civic Trust regarding the expansion of the airport and the Core Strategy's position on climate change.

4.0 **Corporate Considerations**

As noted above, the Core Strategy, forms part of the Local Development Framework and once adopted will form part of the Development Plan for Leeds.

4.1 **Consultation and Engagement**

- 4.1.1 As outlined in this report, the Core Strategy Publication draft has been subject to a further 6 week period of consultation. This has been undertaken in accordance with

the LDF Regulations and the City Council's adopted Statement of Community Involvement (SCI).

4.2 Equality and Diversity / Cohesion and Integration

4.2.1 An Equality Impact Assessment Screening was undertaken on the Core Strategy Publication draft, prior to consultation (see Core Strategy Executive Board Report, 10th February 2012). This concluded that equality, diversity, cohesion and integration issues had been embedded as part of the plan's preparation. For information and comment, the Screening assessment has also been made available as part of the supporting material for the Publication draft consultation. Within this overall context, it will be necessary to continue to have regard to equality and diversity issues, as part of the ongoing process of preparing the Core Strategy, including considering representations and next steps.

4.3 Council Policies and City Priorities

4.3.1 The Core Strategy, plays a key strategic role in taking forward the spatial and land use elements of the Vision for Leeds and the aspiration to the 'the best city in the UK'. Related to this overarching approach and in meeting a host of social, environmental and economic objectives, where relevant the Core Strategy also seeks to support and advance the implementation of a range of other key City Council and wider partnership documents. These include the Leeds Growth Strategy, the City Priority Plan, the Council Business Plan and the desire to be a 'child friendly city'.

4.4 Resources and value for money

4.4.1 The DPD is being prepared within the context of the LDF Regulations, statutory requirements and within existing resources.

4.5 Legal Implications, Access to Information and Call In

4.5.1 The DPD is being prepared within the context of the LDF Regulations and statutory requirements. The DPD is a Budgetary and Policy Framework document and as such this report is exempt from call-in by Scrutiny.

4.6 Risk Management

4.6.1 The Core Strategy is being prepared within the context of the LDF Regulations and the need to reflect national planning guidance. The preparation of the plan within the context of ongoing national reform to the planning system and in responding to local issues and priorities, is a challenging process. Consequently, at the appropriate time advice is sought from a number of sources, including legal advice and advice from the Planning Advisory Service and the Planning Inspectorate, as a basis to help manage risk and to keep the process moving forward.

5. Conclusions

5.1 This report provides an overview of the issues raised about Policy SP12. On the basis of these, it is considered that a major change should be made to the wording

of the Core Strategy; in addition two of the responses merit minor changes. All of the others warrant no further changes.

6. Recommendations

6.1 Development Plan Panel is requested to:

i). Endorse the analysis of the issues raised and any suggested Core Strategy text changes (as detailed in Appendices 1 and 2 to the report) for presentation to Executive Board for approval.

7. Background documents¹

7.1 A substantial number of documents are available representing various stages in preparation of the DPD and the background evidence base and Equalities Impact Assessment Screening. These are all available on the City Council's web site (LDF Core Strategy Pages) web pages or by contacting David Feeney on 247 4539.

¹ The background documents listed in this section are available for inspection on request for a period of four years following the date of the relevant meeting. Accordingly this list does not include documents containing exempt or confidential information, or any published works. Requests to inspect any background documents should be submitted to the report author.

Appendix 1;

Core Strategy Publication Draft - Analysis of Consultation Responses
SP12. - Managing the Growth of Leeds Bradford International Airport

Representor/Agent	Representor Comments	LCC Initial Response	Action
Craven District Council.	<p><u>1. Support</u> <u>1a. Support General</u> Support for SP12 enabling Leeds Bradford International Airport to fulfil its role as an important regional airport subject to mitigating factors.</p>	Support is welcomed.	No change.
Metro.	<p><u>1.b Airport Surface Access Support</u> Growth is subject to the delivery of improved surface access to the airport as stipulated in the policy. Metro, LCC and LBIA have successfully worked in partnership to ensure the airport is served by bus. As the airport expansion proposals are developed we would expect a step change in the surface access as identified in the policy.</p>	Comment noted.	No change.
Mr Cedric Wilks.	Support the tram/train link from the Leeds/Harrogate line.	Support is welcomed.	No change.
MFS Land LTD.	<p>Support for 'Tram Train' especially with regards to the sustainability of smaller settlements such as Bramhope. Support for NGT Park and Ride (Boddington) providing an additional public transport option for commuters from Bramhope to the city centre.</p>	Support is welcomed.	No change.
Leeds, York and N Yorkshire Chamber of Commerce	We welcome the support for future development and expansion of Leeds Bradford Airport at Policy 12.	Support is welcomed.	No change.
Leeds Bradford International Airport.	<p><u>2. Airport General</u> SP12 does not reflect the importance of the airport in delivering transport connectivity, which has been highlighted elsewhere in the Core Strategy. Suggested changes; LBIA is recognised as an asset of City and Regional significance. It is a key driver of the City and Region's economic growth, prosperity and competitiveness and is a key element of the City and Region's transport system.</p>	The importance of the airport is recognised in the Profile of Leeds Metropolitan District (para 2.27) as well as para 4.9.13 of the Spatial Development Strategy chapter. However, additional text can be added to paragraph 4.9.13 to strengthen the reference to the role of the Airport, as a key component of transport infrastructure and as a 'gateway' to the City Region.	<p>Minor change. Add additional text to paragraph 4.9.13:</p> <p><i>"Leeds City Station and the Airport provide key components of strategic infrastructure, for businesses, residents and visitors. These facilities provide</i></p>

<p>MUSE Development</p> <p>Meadowside Holdings Ltd, The Hatfeild Estate, AR Briggs and Co, Lady Elizabeth Hastings Estate Charity, The Ledston Estate, The Bramham Park Estate, The Diocese of Ripon and Leeds</p>	<p>Yes - Integrated Planning.</p> <p>No comments upon this policy but reserve the right to comment further if the situation changes.</p>	<p>The meaning of this representation is unclear. The Council is unable to provide a response to this comment.</p> <p>Comments noted.</p>	<p><i>'gateways' to the City Region as a whole. The national, Trans Pennine and local linkages from Leeds City Station (including those to Manchester International Airport) are complemented and expanded by the national and international connections afforded by LBIA. In accessibility terms also, the Airport is well connected to the key settlements of Bradford, Harrogate and York, as well as Leeds".</i></p> <p>No change</p> <p>No change.</p>
<p>Leeds Bradford International Airport</p>	<p>3. Airport Growth SP12 makes the growth of the airport contingent on matters which are not clearly defined, already addressed in other legislation and guidance, or beyond the remit of the airport to deliver alone.</p> <p>There has not been any distinction made between short, medium</p>	<p>The policy framework of SP12 and UDP retained policy T30A provides a basis to guide decisions for future growth. SP12 makes it clear that growth of the airport will be supported. The completion of a Masterplan and an accompanying Surface Access Strategy are key to enabling this growth to take place and the Council will continue to</p>	<p>No change</p>

	<p>and long term growth, and the very different surface access requirements that would apply at these stages</p> <p>The policy fails to provide either an appropriate strategic or development control basis to consider airport growth.</p> <p>The emphasis that we have attached to the need for the local authority to work with the airport to deliver airport growth has recently been supported by the National Planning Policy Framework (NPPF).</p>	<p>work with the Airport in progressing its future plans outlined in the two documents.</p>	
Leeds, York and N Yorkshire Chamber of Commerce	<p>Policy SP12 is formulated on the basis of 'managing growth' at the airport subject to the delivery of key infrastructure. There is no recognition as to how that infrastructure will be delivered, or who will be responsible for delivering it, and an inference that without it, there will be no opportunity for the continued development of LBIA. We are concerned that the Policy makes future growth of the airport dependent on such improvements. The development of the Airport is essential to the city's economic competitiveness.</p>	<p>The mechanism for the delivery of transport infrastructure will need to be addressed in the Surface Access Strategy (and within the context of the Airport Masterplan) and this will need to include a partnership approach. SP11 includes surface access improvements to LBIA as a spatial priority, and this is also reflected in the Leeds City Region Transport Strategy.</p>	No change
Directors Planning	<p>The Policy should be more firm in its support for the expansion of the airport based on an understanding of the real impacts of growth. It should also be more positively worded in relation to recognising and harnessing benefits for the surrounding settlements of Yeadon, Guiseley, Rawdon and Otley, instead of simply focusing upon mitigating and managing potential effects. The policy does not support the airport's plans far enough, by not outlining the opportunities that arise from expansion, such as the economic and transport infrastructure benefits to the surrounding settlements.</p>	<p>Policy SP12 states that the continued development of the airport will be supported subject to the requirements of the policy. The value of the airport as a local employer is recognised in the supporting text (Para 4.9.13)</p>	No change
Taylor Wimpey UK	<p>Paragraph 4.9.13 fails to take account of NPPF requirement (paragraph 158) to consider and integrate strategies for housing and employment and to express this spatially. As the CS proposes to facilitate the growth of LBIA as a key economic driver, there is a need to match economic growth opportunities with the provision of homes.</p> <p>A key consideration to meet CS Objective 7. Making the land available for development around settlements where there are existing direct public transport links to the airport in</p>	<p>See above</p> <p>Housing requirements are informed by the Regional Econometrics Model which takes account of employment growth.</p>	No change

	place, including positive contribution of PAS land, would be a logical approach to maximising the opportunities presented by LBIA.		
Leeds Bradford International Airport	<p>4. Airport Surface Access General As part of any planning application for the growth of the airport, LBIA will need to address surface access requirements, any impact which requires mitigation would also form part of either a condition or obligation agreed as part of a planning permission. For these reasons, it is not necessary or reasonable, for the growth of LBIA to be contingent on the agreement of a surface access strategy. Suggested changes LCC support the continued improvement and growth of LBIA in accordance with the ATWP subject to: Seeking to ensure that any new operational development minimises its impact upon the local environment including the local highway Network.</p> <p>In the supporting text and at criterion of SP12 (i), it is indicated that the growth of the airport cannot be sustained without improved connectivity, making reference to tram-train and the A65/A658 link road. These major infrastructure proposals are supported by LBIA, but it must be recognised that these are longer term objectives, which can only be delivered by a partnership of stakeholders including LBIA. The airport's growth is not and should not be contingent on their delivery.</p> <p>In the short to medium term, there are a range of measures relating to improved bus access including increased frequencies, new routes, and improved marketing, and travel plan co-ordinator, which would support the shift towards more sustainable modes of access to the airport. These options are being considered through a review of the airport's surface access strategy and on an ongoing basis by LBIA and its partners at LBIA's transport forum.</p> <p>Suggested changes; LCC will work with LBIA and other partners to maximise accessibility to the airport by public transport and other sustainable means in preference to single occupancy car journeys.</p>	<p>SP12 makes it clear that growth of the airport will be supported. The completion of a Masterplan and an accompanying Surface Access Strategy are key to enabling this growth to take place. It is recognised that a partnership approach will be necessary to deliver any major transport interventions. Existing permissions will already allow a significant amount of growth of LBIA.</p> <p>It is recognised that SP12 (i) as currently phrased would rule out any further growth without the delivery of specific interventions. Nevertheless incremental expansion beyond the current permissions are not consistent with Leeds City Council and Regional aspirations. It is considered that the Surface Access Strategy should identify agreed trigger points that would specify a timetable for the delivery of such interventions. It is consequently proposed to amend SP12 as follows:</p> <p>(i) Provision of major public transport infrastructure (such as tram train) and surface access improvements at agreed passenger levels; (ii) Agreement of a surface access strategy with identified funding and trigger points;</p>	<p>No change</p> <p>Major change: (i) Provision of major public transport infrastructure (such as tram train) and surface access improvements <i>at agreed passenger levels</i>; (ii) Agreement of a surface access strategy with identified funding <i>and trigger points</i>;</p>
Harrogate Borough Council.	The Tram Train Link from Leeds to the Airport should be changed to reflect the need to upgrade the complete rail link through to	The supporting documents LTP3 and Draft Rail Plan7, give further details of Harrogate line	No change.

<p>Leeds Civic Trust</p> <p>Bradford Metropolitan District Council, Bradford Metropolitan District Council (Highways)</p>	<p>Harrogate Knaresborough and York. The proposed Tram Train (phase 1 and 2) on the key diagram and on Map 9, should be combined to one phase to give equal high priority to the link through to Harrogate. The notation should be changed from 'Tram Train' to 'Electrification'.</p> <p>Improving surface access needs to be the subject of a comprehensive study. The surface access strategy should have a primary aim of improved public transport for users and employees. Concern has been raised that a new road link would encourage more car use at the expense of public transport, and increase congestion at the Horsforth Roundabout.</p> <p>Public transport should not be from only Leeds City Station. Public Transport caters for both passengers, employees and local journeys. Medium term improvements are needed as many bus services are hourly</p> <p>The Key Diagram shows the tram train link to LBIA via Harrogate Line. There would be more benefit accrued for West Yorkshire as a whole by integrating the links from both cities to LBIA utilising the Wharfedale line via Shipley.</p>	<p>improvements. Rail Plan7 includes the aspiration to electrify the Harrogate line and provide modern trains, as well as the provision of Tram-train from Leeds to LBIA. The Tram Train phase 1 and 2 on the key diagram and map 11 reflect the aspirations of Rail Plan 7.</p> <p>The new link road would relieve existing communities such as Horsforth and Rawdon, as well as providing an enhanced route to the airport for general traffic and buses from the A65. Improvements are also planned for Horsforth roundabout.</p> <p>Existing bus services provide links to LBIA from Bradford and other communities.</p> <p>Draft Rail Plan7, forms part of LTP3 and sets out Metro's plans to improve rail travel for customers. The plan confirms that a future tram train link to LBIA would spur from the Harrogate Line.</p>	<p>No change.</p> <p>No change.</p> <p>No change.</p>
<p>Leeds Bradford International Airport</p>	<p><u>5. Airport Car Parking</u> Airport car parking is a critical source of revenue to fund new airport facilities and support bus services. Car parking supply and pricing is also important in the co-ordinated management of car parking to promote more sustainable modes of access to the airport. This matter should be addressed within the Core Strategy. The development of car parking to serve LBIA should be contained wholly within the AOLB, and should be prohibited outside of the AOLB, in order to secure a comprehensive and co-ordinated approach to the airport's surface access.</p>	<p>Parking as a whole is just one element of any access strategy. Evidence needs to be provided to demonstrate how a policy on off-site parking would help achieve delivery of the surface access improvements. The means of providing evidence should be through the review of the Airport Masterplan and Airport Surface Access strategy.</p>	<p>No change.</p>
<p>Leeds Bradford International Airport</p>	<p><u>6. Airport Environmental Impacts</u> The supporting text makes reference to the impact of air travel on climate change, and the impact on the local environment, context is not provided on the impact of air travel on CO2 emissions, and the inclusion of air travel in the EU Emissions Trading Scheme.</p>	<p>The supporting text provides a context to the implications of airport growth, however, SP12 does not place any constraint on LBIA growth with respect to CO2 emissions. As para 4.9.12 makes clear, these issues will be balanced with</p>	<p>No change</p>

<p>Leeds Civic Trust</p>	<p>Court decisions in 2011 outline this is an national issue and that climate change is not a consideration for LA's in planning applications for airport development. If climate change and local environmental impacts are referenced within the supporting text to the policy, then sufficient context should be provided to explain how these matters relate to aviation and LBIA specifically.</p> <p>Impacts on the local environment do not take account of 'leakage' previously acknowledged in the Regional Economic Strategy.</p> <p>There is no mention that noise and air quality emissions are controlled by a comprehensive monitoring mechanisms enshrined within planning conditions, and that the airport complies with these requirements.</p> <p>Criteria (iii) of the policy, LBIA has, and will continue to, seek to minimise local environmental impacts. The need for formal environmental assessment, as indicated in SP12, is a matter already covered by separate environmental legislation and therefore it is not necessary to include any reference to it in the Core Strategy.</p> <p>In the absence of any explanation of what criterion (iv) relates to, or how it will be interpreted or applied, we object to the inclusion of this criterion. Suggested changes; LCC will work with LBIA and other partners, including the local community, to seek to minimise the environmental impact of operations at, and connected with, the airport.</p> <p>The Core Strategy seems to have contradictory position on Climate Change and Airport expansion. How are the "environmental assessment and agreed plans" (iii) to be carried out and enforced? Targets should also be set. Mitigation plans should not be nullified by the phrase "where appropriate" which effectively provides an option for non compliance.</p>	<p>national objectives and guidance.</p> <p>It is recognised that growth at LBIA may reduce the number of journeys to Manchester, however, the principal impact of growth would fall on communities within Leeds.</p> <p>It is not considered that this needs to be mentioned in the Core Strategy.</p> <p>SP12 (iii) ensures that local environmental impacts not covered by separate legislation are considered, such as drainage and nature conservation.</p> <p>The management of any local impacts is expected to primarily cover visual and highway issues. SP12 (iv) will be amended as follows: (iv) The management of any local impacts and implementation issues, including visual and highway issues.</p> <p>The supporting text provides a context to the implications of airport growth, however, SP12 does not place any constraint on LBIA growth with respect to CO2 emissions. As para 4.9.12 makes clear, these issues will be balanced with national objectives and guidance. Growth of all types inherently has environmental consequences. The strategy is to make growth as sustainable as possible.</p>	<p>No change</p> <p>No change</p> <p>No change</p> <p>Minor change. Amend criterion (iv) of Policy SP12 adding: <i>"including visual and highway issues."</i></p> <p>No change</p>
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APPENDIX 2 - CHANGES TO CORE STRATEGY TEXT

4.9 Integrating Transport and Spatial Planning

4.9.13 Leeds Bradford International Airport (LBIA) makes an important contribution to the economic growth of Leeds and the City Region, both in terms of economic attractiveness and as a local employer. It is estimated that LBIA provides in the order of 2,500 jobs within the City Region economy (Arup and Oxford Economics LBIA Impact Assessment 2009). *Leeds City Station and the Airport provide key components of strategic infrastructure, for businesses, residents and visitors. These facilities provide 'gateways' to the City Region as a whole. The national, Trans Pennine and local linkages from Leeds City Station (including those to Manchester International Airport) are complemented and expanded by the national and international connections afforded by LBIA. In accessibility terms also, the Airport is well connected to the key settlements of Bradford, Harrogate and York, as well as Leeds.* For the future growth of the airport to be sustained, improved connectivity via surface access needs to be delivered. The Leeds City Region Transport Strategy (2009) identifies improved surface access to the airport as a policy priority. Measures are currently being investigated including a tram-train link from the Leeds-Harrogate line and an A65/A658 road link.

SPATIAL POLICY 12: MANAGING THE GROWTH OF LEEDS BRADFORD INTERNATIONAL AIRPORT

The continued development of Leeds Bradford International Airport will be supported to enable it to fulfil its role as an important regional airport. ~~The further growth of the airport will be supported subject to:~~

- (i) Provision of major public transport infrastructure (such as Tram Train) and surface access improvements *at agreed passenger levels*;
- (ii) Agreement of a surface access strategy with identified funding *and trigger points*;
- (iii) Environmental assessment and agreed plans to mitigate adverse environmental effects, where appropriate;
- (iv) The management of any local impacts and implementation issues, *including visual and highway issues*.