



NT/A048613

Mr. P. Crabtree
Chief Planning Officer
Leeds City Council
City Development
The Leonardo Building
2 Rossington Street
Leeds
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7th September 2012

BY EMAIL ONLY

Dear Phil,

LBIA - Core Strategy

Further to our meeting on 6th September at which we discussed the representations that we submitted on behalf of LBIA to the Core Strategy and in particular the most recent officer changes proposed for consideration at Development Plans on 11th September.

We focus in this letter on the changes proposed to the Core Strategy following the latest consultation, but our original comments and concerns with how the policy SP12 is phrased and its implications remain. I've therefore enclosed a copy of our original representation and a letter that we sent to Ms Janet Howrie on 6th June following a meeting at which we discussed the airport policy, Green Belt and off-site car parking.

Airport Growth (SP12)

Taking SP12 first, the following text is included in the paper for Development Plans Panel:

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:

- (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;***

The officer's comments (above) indicate that the expansion of the airport beyond the current permission is not supported by LCC or regional aspirations. This statement is contrary to all discussions we have had, comments elsewhere in the Core Strategy, City Region and current, and emerging national policy. We look to the council for some clarity on this fundamental point.

The context to Policy SP12, as noted above, is to prevent further growth of the airport without the delivery of specific interventions. The officer's interpretation of the policy fully reflects our concerns over how Policy SP12 will be applied to airport development, which we consider inconsistent with the positive comments and supportive words elsewhere in the Core Strategy and national policy. We have commented upon this



and a number of other detailed concerns we have with the policy in our representation (enclosed), which we have not sought to duplicate here.

LBIA fully acknowledges that it will need to address its impacts as it grows and surface access is one of those aspects. However, there should not be an assumption that airport growth results in greater vehicular traffic impact at peak times. Following the lead of other airports, for example Luton, the growth of LBIA will need to be spread throughout the day to optimise the use of the airport's infrastructure. Given the carriers, routes, and infrastructure at LBIA, it is reasonable to expect that air traffic growth will come not from a significant increase in peaks but will come from a greater spread of traffic throughout the day. There will not therefore be a direct relationship between passenger growth and highway impact.

Passenger growth is therefore one, but not a representative measure, for assessing potential highway impact and surface access needs of the airport as it grows. Air traffic movements, the scheduling throughout the day and season, airside infrastructure capacity, and passenger numbers all need to be looked at together to establish the potential future surface access needs of the airport.

There also needs to be some context to what surface access 'interventions', referred to in the policy, need to be and could be, in the short, medium, and long term. The only ones mentioned are major surface access proposals – tram train and the airport link road. Neither of which are necessary for the airport to grow and mitigate its impact in the short or medium term, and neither could be delivered by the airport alone. LBIA is currently relatively small and the short and medium term surface access needs of the airport will therefore realistically focus on increasing the frequency of bus links, securing new bus links, improved marketing of those routes, and connections with local railway stations. Longer term aspirations, such as delivering tram train will require commitment from the airport and a whole range of stakeholders, and there is no agreement on how and when that could be taken forward. A considerable level of work is needed to assess its feasibility and that of the link road.

In summary our concerns with the proposed changes are:

- Major public transport infrastructure (such as tram train) and surface access improvements are not needed to support the growth of the airport
- Passenger levels (alone) are not an appropriate measure of the airport's impact on the highway network
- The surface access strategy is not the mechanism for developing a business case and identifying funding for surface access improvements. This needs to be developed in partnership with a wide range of stakeholders. It's not possible to predict in the surface access strategy precisely when particular interventions will be required as they will depend on a whole range of considerations, many of which will be outside the airport's control.

Car Parking

At the Sentinel and Avro Public Inquiry, we supported the council's view that there was no need for further car parking to service the airport and crucially that unless car parking supply and pricing was managed as part of a co-ordinated surface access strategy to improve public transport then car use would inevitably increase, and the airport working in partnership with other stakeholders would not be able to positively influence public transport patronage. As you are aware airport car parking is a critical source of revenue for the airport to fund new facilities and support bus services. If over time that continues to be affected by further provision of off-site car parking then this will have a real and detrimental impact on the airport's ability to fund public transport and other surface access infrastructure.

It is unfortunate that at LBIA the potential for off-site car parks to develop further is enhanced by the airport being entirely washed over by Green Belt and the close proximity of two, large, underutilised



previously developed, allocated employment sites which are not designated Green Belt. These factors combined were significant in the Inspector's decision to support the Sentinel and Avro appeals. In the current policy context there remains the real possibility of further off-site car parking provision which will have a considerable impact on the airport and potentially on the council's provision of employment land in the north west of the district.

There is therefore an urgent need for a policy (as has been adopted by other councils; examples of which we have supplied to you) to preclude off-site car parking.

Green Belt (SP10)

We do not consider that there is any merit in the airport and its operational land being designated Green Belt. It doesn't meet any of the purposes of Green Belt designation in the NPPF. Furthermore, the reasons given by the Inspector in supporting the Sentinel and Avro appeal demonstrates the impact that it can have on airport operations. The Green Belt designation may also impact on the potential to secure any commercial development proposals or airport related employment development, which is seeking to locate as close as possible to the airport. There are therefore good reasons why consideration should be given to a localised review of the Green Belt at LBIA.

Finally, we have consistently received assurances from officers that off-site car parking, the implications of airport growth, and the need to review the Green Belt are matters that, subject to consideration of the masterplan and ASAS review, could be addressed through the Site Allocations DPD. The reference point we have been given is the following supporting text to SP12 – *"subject to the outcomes of this review process (ASAS and masterplan) the Council will assess the need to revise existing planning policies relating to the airport's designation, operational use and surface access proposals"* (para 4.9.14). We were therefore very surprised to hear for the first time in our meeting on 6th September that this may no longer be the case and is contrary to the impression we had been given and indeed what we understood the purpose of the text outlined above to be. Given that these matters have not been fully addressed in the Core Strategy, we consider it essential that, as part of our discussions on the masterplan and ASAS, that consideration be given to these points in the Site Allocations DPD.

Should you have any questions on any of the above, please do contact me. We look forward to your response and holding regular meetings going forward.

Yours sincerely

A handwritten signature in black ink that reads 'Nolan Tucker'.

Nolan Tucker
Regional Director
On behalf of WYG

cc – Carl Lapworth, LBIA, Martin Farrington, LCC, David Feeney, LCC, Steve Speak, LCC