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Leeds City Council  
By Email

CPRE West Yorkshire  
17<sup>th</sup> June 2020

Dear Sir/Madam,

### **Planning Application 20/02559/FU: Leeds Bradford Airport**

CPRE West Yorkshire objects to this application for the reasons set out below.

#### **Summary**

We have no objection to the proposed new buildings themselves, insofar as they represent a modernisation of the airport and its experience for passengers, and we support the applicant's proposals to achieve net zero carbon ground operations by 2023.

However, to comply with the Leeds Core Strategy, the proposal must fulfil the requirement that future development of the airport is backed up by adequate environmental mitigations. This has not been achieved for the following reasons:

- We acknowledge the proposed cap on increased car parking capacity, but we do not accept that this stands up to scrutiny.
- Leeds Bradford is a poorly-located airport for public transport compared to its key competitors, especially Manchester, and we do not consider the proposals to achieve modal shift are realistic. Consequently, a significant rise in car-based surface access is an evitable consequence of the proposed growth, and will bring about a marked increase in carbon emissions, pollution and congestion.
- The proposal is predicated on stimulating and fulfilling a scale of growth in aviation at LBA that is incompatible with its location and incompatible with tackling the climate emergency.
- To approve the proposal would be to lock in an expectation for the airport to grow in use and to increase the economic dependence of the City Region on that growth. Again, this is incompatible with tackling the climate emergency.

Therefore, policy and material considerations indicate that the scheme is unacceptable, both in principle and on balance, and in our view it should be refused. We provide detailed comments below.

We also consider that the information provided by the applicant on proposed changes to night-time flying restrictions is too wrapped in technical terminology to give affected residents any real understanding of the implications of this, and a much clearer explanation is needed.

## The Economic Case

The projected growth in passenger numbers is put forward by the applicant as a key justification of need for the scheme. The Airport is relying on forecasts from a 2018 national study to suggest that it could grow from its 2019 base of 4 million passengers per year, up to 7 million in 2030. This is supported by predictions for how many jobs and how much economic growth this would enable.

We do not accept the economic case presented, for two reasons:

- Firstly, there may be other, much more environmentally beneficial sectors in which to promote the creation of 5,000 jobs – not least in activities that make a demonstrably positive contribution to addressing the Climate Emergency. Therefore it is not a given that airport-related job creation is wholly beneficial for the Leeds City Region economy.
- Secondly, passenger growth is under huge risk thanks to COVID-19, with a projected slump that will last for several years. A new report by the New Economics Foundation, ‘Crisis Support to Aviation and the Right to Retrain’ (June 2020), foresees up to 39,000 direct job losses in aviation in the UK, and up to 70,000 jobs when linked supply chains are accounted for. This is equivalent to the scale of losses from the coal industry in the 1980s. The report identifies the need not only for substantial bailouts of the aviation industry, but also *“Delivery of a new skills and employment strategy, including conversion of the job retention scheme into a new job reskilling programme which protects employment while workers are supported to transition into alternative roles”*. That the report has been produced in consultation with the TUC and aviation unions indicates that the prospect of heavy job losses in aviation is a very real one.

By contrast, the applicant’s Planning Report asserts that *“in the event that Covid-19 impacts on the local economy negatively, which is highly likely, the economic benefits of this project take on even greater importance, and material weight in decision making”*. We cannot accept this assertion. To suggest that even greater weight than usual should be given to the economic importance of the airport, at a time when the aviation industry is in serious risk of a long-term or even permanent setback, is analogous to asking Leeds City Council to back an injured horse in a decisive race.

## Climate Emergency

Leeds City Council has put admirable effort into backing up its Climate Emergency declaration with meaningful action, including scrapping the link road to the airport. Like most Councils, it needs to show about 14%-15% annual reductions in carbon emissions in order to reach its 2030 and 2050 targets. The Climate Emergency declaration includes specific reference to the airport, as follows:

*“With respect to aviation, the council accepts that aviation growth and meeting zero carbon targets are fundamentally incompatible until such time as new technologies are developed. The council believes that aviation targets need to be set at a national and international level rather than locally, reflecting the fact that more people from Leeds fly from other airports than Leeds Bradford Airport (LBA), and that any isolated actions could lead to displacement.”*

At first glance, this may be said to align with the applicant's assertion that *"There is considerable passenger leakage from the region to other regional airports...This is clearly neither environmentally or economically sustainable, and the retention of passengers will clearly be beneficial to both the local environment and the economy."*

We do not accept this assertion. Manchester Airport envisages passenger growth of 22mppa over the same period. The 4mppa growth envisaged for LBA may seem marginal by comparison, but since both growth figures are based on the same national forecasting it is evident that they combine to produce a forecast of 26mppa across the two airports. This raises two issues:

- Despite both airports setting targets to increase the proportion of passenger journeys being accessed by public transport, there will inevitably be a substantial increase in the total number of car journeys to both airports, so it is impossible to conclude that an increase in capacity at LBA would reduce the total car mileage for surface access;
- Irrespective of the national and international imperative to address the carbon footprint of aviation, the surface access implications of passenger growth at LBA are locally unsustainable and wholly incompatible with Leeds' actions in addressing the Climate Emergency.

### **Public Transport & Car Parking**

In our view, the public transport and car parking strategy does not stand up to scrutiny.

The applicant admits that the parkway station proposals are 'at an early stage of preparation' and might happen in five years – in other words by 2025 at the earliest, in the context of a growth plan for the period to 2030. So a substantial proportion of the total growth may happen even before the earliest date that the station may open. Even after opening, the rail station will not have anything like the network connectivity of Manchester Airport, with both a well-served rail station and the Metrolink.

We have serious doubts about the car parking strategy. Bold claims are made of capping the total amount of car parking at the existing level (7,600 spaces) and achieving substantial shift to public transport; but there is reserve capacity for an additional 737 spaces 'if proven necessary' - so an almost 10% increase could happen; and any delays to the opening of the rail station may well be argued to trigger the expanded car park capacity. Further, a brief Google search reveals at least 1,500 additional parking spaces currently being provided privately off-site, and we presume that a 'parkway' rail station would also come with extensive car parking. This points to the likelihood of future planning applications to permit significant increases in nearby, off-site parking capacity (possibly in the Green Belt).

### **Night-flying, noise pollution and light pollution**

The applicant deals at some length with the matter of modifying the night-flying restrictions, mainly centred on parity with other airports. We note that, for noise monitoring purposes, Manchester uses the 23:00 to 07:00 night-time that the applicant seems to decry, but also has variable restrictions depending on the noise Quota Count (QC) of the aircraft. In short, a greater number of quieter aircraft than louder ones may use the airport between 06:00 and 07:00. We find the applicant's proposals in this regard somewhat confusing. A significant segment of central and suburban Leeds is on the runway axis, and residents of those areas

require information that is clear and unequivocal to the layperson, about how many more night-time and early morning flights will be enabled by the proposed changes.

It has been suggested to us that the new terminal, by its location at the other end of the airport from the existing terminal, may cause problems of light pollution and thereby impact on amenity, nature and the night-time openness of the adjacent Green Belt. We have not examined this matter in detail, but we consider it worth raising as a possible concern.

### **Planning Balance**

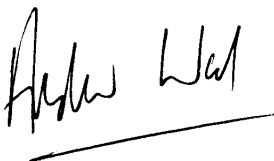
The Leeds Core Strategy (policy SP12) says that growth of the airport will be supported **subject to** major investment in public transport infrastructure. The airport suffers from poor transport access compared to many other airports, notably Manchester, and the proposed parkway station seems several years away yet. Without genuine commitment from all relevant parties to make the station happen **before** passenger growth, we consider that for the Council to support the growth of the airport would directly conflict with this policy SP12.

The application puts forward several environmental mitigations which are, in themselves, welcome, namely the 'BREEAM Excellent' rating for the terminal, the net zero carbon target for ground operations, and net gain for biodiversity. These measures will give compliance with existing policies in the Leeds Core Strategy (policies G9 and EN2). Compliance is not an enhancement; rather it is a baseline expectation for what would constitute an acceptable scheme. These factors therefore cannot be said to weigh in the scheme's favour in the planning balance.

The only remaining factor that could be argued to weigh in the scheme's favour would be the economic benefits. As we have already argued, the economic benefits are questionable in themselves, especially in light of the severe impacts of COVID-19 on the aviation industry. But furthermore, to reinforce the City Region's economic reliance on aviation, and on the associated surface access, would be wildly inappropriate for a City Council that is aiming high on its climate response. Consequently, we contend that economic factors should carry limited weight in this application.

We therefore ask that the application be refused.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Andrew Wood', written over a horizontal line.

Andrew Wood  
Consultant Planning Officer, CPRE West Yorkshire