

From: [REDACTED]
To: [REDACTED]
Cc: [REDACTED]
Subject: Leeds Bradford Call In Assessment - comments received on CAP 1770
Date: 21 March 2019 10:04:00
Attachments: [CAP1770.msg](#)
[CAP1770.msg](#)

Dear [REDACTED],

Please note that since publishing CAP 1770, our call in assessment for the Leeds Bradford Airspace Change Proposal, we have received further emails from the correspondents who requested the call in.

I attach these emails and, below, include our comments upon them.

CTA9

Although we had taken into account the comments made in the call in request dated 19 February as part of our assessment (where we have concluded that the noise modelling undertaken by Leeds Bradford is appropriate for the call in criteria and supports our assessment that none of the criteria are met), I can see that it would have made the document clearer had we explicitly referred to the points that were made in that request.

First, it is important to note that just because the airspace change proposal has requested a change to the controlled airspace in an area, it does not mean that more aircraft will fly in this area or aircraft will fly lower. The area in the proposed CTA9 below FL125 is currently 'uncontrolled' airspace, which means that any type of aircraft can use it, including commercial jets on the way into Leeds Bradford. The proposed introduction of CTA9 will not change where commercial jets are allowed to fly. Rather, it means that Leeds Bradford Air Traffic Control will be responsible for the airspace and they will have to give permission to aircraft to enter it under specific conditions. This will limit the use of the airspace above 3,500ft by aircraft that are not appropriately equipped or do not receive permission to enter the airspace (principally, this is likely to affect the local gliding / GA community). It does not mean that commercial aircraft should fly any lower in this area, nor that there will be more commercial aircraft than currently.

The Leeds Bradford Proposal document states at the end of the first paragraph of page 3, that "[The proposed] approach tracks will not differ from those currently flown by aircraft on their last 10 NM before landing", and the environmental report in para 4.2.1 says "the procedural changes for arriving aircraft will seek to formalise the existing arrangements for arriving aircraft and therefore there will be no noticeable change for local residents due to arriving aircraft". Therefore it is clear that the intention of the proposal is not to make any significant changes to the way aircraft approach the airport.

The area under proposed CTA9 is currently significantly outside the 54 dB LAeq 16hr contour (as shown in Figure 8 of the environmental report and which we have validated through our analysis). So, whilst it is true that the noise modelling undertaken for LBA did not model any changes to arrival patterns (as stated in para 4.2.1), the noise contours in Figure 8 (which represent the average noise experienced due to both arriving and departing flights) would not be expected to change noticeably if it had taken some changes to arrival patterns into account. Therefore we do not believe there is any evidence to suggest that the area under CTA9 would be

within the 54 dB LAeq 16hr noise contour and we have no reason to change our assessment of whether the noise call in criterion would be met.

Shallower departures

Paragraphs 2.22 to 2.26 of CAP1770, which consider the noise analysis produced in the environmental report, benchmarking from the CAA on a similar airport and what the Leeds Bradford proposal says (or does not say) about shallower ascents for departing aircraft, all indicate that the noise call in criteria is not met by the Leeds Bradford Proposal. In paragraphs 2.27 we went on to consider the analysis undertaken in the letter of 15 February and it is our conclusions from this paragraph which is being questioned in this further correspondence.

Our understanding of the analysis undertaken by [REDACTED] still leads us to believe that it overestimates the increase in size of the noise contour. It seems to reason like this:

- Departing aircraft that currently reach 3000ft near waypoint NME01, under conditions of shallower departure angles will instead reach 3000ft in the vicinity of Burley Park rail station
- Therefore the noise from aircraft currently experienced near waypoint NME01 (approx. 57 dB LAeq 16hr) will be the same as that experienced following the airspace change in the vicinity of Burley Park rail station
- Using this equivalence as a basis, and assuming the contours will be roughly the same shape (albeit extended) the blue area in Figure 2 of the letter has been constructed and the population encompassed by it has been estimated

However, we believe that the second bullet point above is not correct. The noise currently experienced near the waypoint NME01 arises from a mixture of arriving (c74%) and departing (c26%) aircraft and it is only the departing aircraft that are assumed (in this scenario) to fly in a different way than they do today. Therefore, the noise experienced in the vicinity of Burley Park rail station from departing aircraft following the airspace change can be assumed to be similar to that currently experienced near waypoint NME01 (under this scenario), but the noise experienced in the vicinity of Burley Park rail station from arriving aircraft following the airspace change cannot be assumed to be similar to that currently experienced near waypoint NME01, in fact it will be the same as that currently experienced in the vicinity of Burley Park rail station. Therefore we believe that the estimate of population exposed to 54 dB LAeq 16hr following the proposed airspace change in the letter of 15 February is an overestimate, and would be unlikely to exceed 10,000.

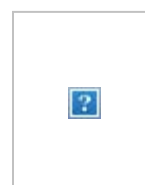
Therefore it is still our assessment that the noise call in criterion is not met.

Best regards,

[REDACTED]

[REDACTED]

Policy Development
Civil Aviation Authority



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Please consider the environment. Think before printing this email.



From: [REDACTED]
To: [REDACTED]
Subject: CAP1770
Date: 19 March 2019 09:50:41

Dear [REDACTED]

I have been assisting NWLTF with their analysis of potential impacts of the airspace changes at Leeds Bradford Airport and my attention has been drawn to

paragraph 2.27 of CAP1770.

I think there may be some misunderstanding.

The estimate of population brought within the 54Db LAeq 16hr contour contained within the call-in request letter dated 15th February did allow for the fact that only 26% of departures and 74% of arrivals will pass over the area to the SE of the airport and that the number and pattern of arrivals will be no different. The area coloured blue in figure 2 of that letter is already affected by noise from aircraft arriving and departing but, for the purposes of this exercise, I assumed that the contours produced by LBA are correct in indicating that this is not sufficient to bring it within the 54DB LAeq 16hr contour. However, the additional noise that would be caused by shallower ascents would be sufficient to bring the area within the contour even if the noise from arriving aircraft is unchanged. The contours reflect the total noise from aircraft (arriving and departing) not just the increment due to the airspace changes affecting departing aircraft.

The noise experienced in the vicinity of Burley Park Rail Station would be similar to that currently experienced in the vicinity of NME01 (ie resulting from 26% of departures and 74% of arrivals).

I would welcome your comment.

[REDACTED]
Emeritus Professor of Transport Planning, University of Leeds

From: [REDACTED]
To: [REDACTED]
Subject: CAP1770
Date: 15 March 2019 09:02:13

Dear [REDACTED]

I hope you can help me understand CAP1770. I submitted the 19th February call in request. This is the first time I have been involved in acp process and find some of the documents difficult to understand. Can you point me in the right direction, whilst I can see the 19th February letter referred to in the opening paragraphs I can't find the assessment carried out by the CAA on why the area under the proposed CTA9 (Eggborough to Sherburn in Elmet) it doesn't meet the criteria.

Thank you in anticipation.

Regards

[REDACTED]