

S Webb Esq MP  
Member of Parliament for Thornbury & Yate  
House of Commons  
London  
SW1A 0AA

Our Ref: ac/km  
Your Ref: cla/jw

25<sup>th</sup> November 2011

Dear Mr Webb

**RE: Closure of Filton Airfield**

Thank you for your letter of 11 November 2011 including the Light Aircraft Association's feedback to South Gloucestershire Council's public consultation on the Core Strategy. Several local pilots attended the public displays around Filton and were urged to set out their views in writing. This will also help to inform BAE Systems for its future outline planning application, which we hope to submit in 2012/2013.

You will already be aware of our commitment to permit emergency helicopters, if they wish, to continue operations from within the current airfield boundary after closure; and our commitment to support the preservation of Filton's aviation heritage. Our discussions with all parties continue on these and exact details will become clearer in due course.

I know that Amanda Deeks is responding to you on behalf of the Council on planning points has raised. For BAE Systems' part, recent title and planning enquiries have not raised any evidence of the planning condition suggested by I , although indeed the council will necessarily have to agree to change of use for development to take place.

Regarding the aviation points I raises, I enclose a copy of the independent report into airfield options and would draw your attention particularly to its 60 page technical appendix by aviation consultants Mott MacDonald. The report covers many of wider aviation industry points in some detail. (It is publicly available on the internet at [www.filtonairfielddevelopment.co.uk/pdf/FiltonAirfield\\_AviationOptionsReportv3.pdf](http://www.filtonairfielddevelopment.co.uk/pdf/FiltonAirfield_AviationOptionsReportv3.pdf)) (*Please note: page references hereafter refer to the report's Appendix, which begins after page 40*).

Five key aviation sectors were analysed in the context of Filton's existing facilities, location, competition and potential markets. A detailed analysis of runway based development options (p.43) includes a shorter runway for use by Light Aircraft (p.52). The final pages (pp. 58/59) provide a table of the findings and include "General Aviation" both with and without pilot training as options 11 and 12. These conclusions in most cases confirm BAE Systems' own experience and we share the view that there is no demonstrable viable and sustainable market for the limited aviation options that the airfield can offer.

It is important to highlight that the Strategic Review of General Aviation in the UK, July 2006, (extracts of which are appended to I letter), scopes the term General Aviation to mean: "... a civil aircraft operation, other than a commercial air transport flight operating to a schedule." And indeed it highlights many of the reasons why it has not been possible for Filton Airfield to secure a future as a viable aviation business, leading to the decision that the best economic future will be secured by its closure and development. In this context the

CAA's Review and EU statements can be seen to be very much in line with Mott MacDonald's findings

However, as [redacted]'s letter focuses on 'Light Aviation', a category that the Mott MacDonald report defines as 'Private Flying, Aerial Work and Recreational Flying involving all types of aircraft' but still terms 'General Aviation' (p.33), I will respond on that premise. Consequently many other extracts of the CAA Review apply, including significantly:-

*2.2 The economic value of the various parts of GA will be equally varied. Recreational flying is, in general, likely to have very little direct economic value (although there may be considerable social or utility value) and marginal indirect benefit to the wider economy, whereas tailored GA business travel may have very high economic value, both direct and indirect.*

*2.4 The wider impacts of GA are also considered. GA brings benefits in terms of providing an effective option for personal and public transport, and has recreational, educational and training benefits too. These need to be set against the negative environmental impacts in relation to noise and emissions.*

That last sentence is critical for Filton Airfield, i.e. both the environmental impact and safety concerns of the local community are prime considerations in respect of its operations. The Strategic Review covers these widespread and common concerns in detail and includes recommendations for the CAA and GA community to respond with "increased public sensitivity to environmental issues" and details a number of proposed actions in this respect.

Light aircraft at Filton have consistently been the major source of residents' complaints. This is well documented in the Minutes of the Filton Airfield Consultative Group (FACG) which are available on Filton's website ([www.bristolfilton.co.uk](http://www.bristolfilton.co.uk)).

FACG was established in 1996 following the Airfield Public Enquiry. It meets three times a year and looks at all aspects of airfield activities, including flight movements, complaints and operational issues. The Group comprises seven councillors from adjacent/nearby South Gloucestershire parishes, an Environmental Protection Officer and three elected members from South Gloucestershire Council (currently Cllrs Brian Allinson, Roger Hutchinson and Sheila Cook); Bristol City Council's Health and Environmental Services representative; Councillors from Henbury and Southmead and BAE Systems, Airbus and Roll-Royce.

Over the years, the work of this Group has resulted in a number of voluntary changes and restrictions in the interest of good community relations, aimed at reducing the environmental impact of aircraft flying in and around the area. Most of the changes have related to usage of the airfield by light aircraft, especially during pilot training. These have included:-

- Raising the 'circuit height' and conducting circuits for visual training aircraft on alternating weeks to the north or the south of runway – until recently - with occasional exceptions under ATC instructions to ensure safe separation of aircraft;
- Agreement to close the airfield on UK bank holidays (mentioned by [redacted]);
- ATC measures to limit aircraft in the visual circuit at any time. (This reduces the aircraft movements in any hour and maintains a safe distance between aircraft operating in Filton's Air Traffic Zone).

Fuller details appear on the website, including the enclosed copy of a letter from Neil Higgs of South Gloucestershire Council to Dr Doug Naysmith MP in September 2008; this gives a good flavour of the many issues the airfield operations team have faced in balancing the requirements of local residents and airfield customers.

This represents just one factor in BAE Systems being unable to agree to private 'indemnity flying' from an unserviced airfield. Not only would it create potential operational/safety risks,

but it would especially create unacceptable reputational and indeed security risks to what is essentially a high profile defence and aerospace industrial site and private airfield.

With its increasing proximity to large and growing dense residential areas, GA/Light Aviation has certainly not been a prime market or revenue stream for Filton Airfield. Instead it has targeted the higher revenue/lower aircraft movement option of GA/Business Aviation which is both more commercially viable and more acceptable to local residents. However with the precedent of the failed public enquiry in 1995/1996, only private or corporate business aviation or maintenance has been possible.

Business Aviation is a growth market sector (as mentioned in the 2006 Strategic Review extracts confirm), however there is stiff competition from other airports such as Lulsgate and Gloucester for a relatively limited local market, and these airports have the benefits of scheduled commercial operations seven days a week as well as greater facilities and less constraints; consequently business aviation has also been in decline at Filton as marketing efforts have failed to secure new customers. (Mott MacDonald Report p.27).

Filton has still played its part in other GA operations and has hosted a number of resident GA aircraft and as mentioned in the 2006 Strategic Review, has supported and encouraged pilot training organisations. Indeed until three weeks ago AEROS – a nationwide private pilot aircraft hire and training organisation – had several aircraft based at Filton, but has now moved these to Cardiff, one of its other pre-existing nationwide bases. It should also however be noted that AEROS was reported as ‘going through difficult times with a reduction in trainees’ in the July 2009 minutes of the FACG. Indeed the difficulties facing UK pilot training organisations, including VAT charges and overseas competition, is also addressed in the 2006 Strategic Review.

We are unable to disclose contractual details; however, contrary to the impression given in the 2006 Strategic Review letter, and in-line with industry-wide practice, most airfield based customers such as AEROS and the non-profit making Bristol Aero Club have contracts with BAE Systems at substantially discounted rates, whilst making up the bulk of the airfield’s GA aircraft movements, but regrettably not the bulk of its revenue.

Bank Holiday closure resulted from resident complaints as mentioned previously; whilst the decision to close the airfield on weekends from August 2010 was a commercial one, which undeniably had a major but unavoidable impact on the light aircraft operations. This closure resulted from falling and sometimes nil demand by revenue-generating business aviation aircraft. Weekend use by light aircraft generated negligible income for the already loss-making airfield, and could not nearly cover the costs incurred for air traffic controllers, fire crew and ground handling staff who are all on duty when the airfield is open.

Further to the comments on 2007 pricing, at the standard (non-discounted) pricing published on Filton airfield’s website for 2011 (£26/tonne for aircraft under 2.5 tonnes) a Cessna 182, ranging in weight between 1.2 and 1.4 tonnes would pay from £31.25 to £36.56 + VAT today. This compares favourably with Bristol’s other airport – Lulsgate - at £45.10 per tonne for aircraft under 3 tonnes. Neither Staverton nor Kemble (which targets GA leisure flying as its prime market, with facilities well suited to this) publishes pricing for this weight range. There is however a chart on p.20 of the Mott MacDonald report providing a wider pricing comparison showing Filton’s standard published charges to be competitively priced across the aircraft categories.

The closure of Filton Airfield is undeniably a disappointment and loss of amenity to the private pilots and small aviation businesses that have patronised it for many years, yet are casualties of its closure and we have great sympathy for them. However the area is in our

view far from being the 'general aviation' wasteland claims. Indeed there are four competing airports around Filton, less constrained and hampered by dense conurbations and the precedent of a refused planning application for commercial passenger operations and night flights, all of which have together contributed to Filton's small market catchment area and the inability to demonstrate any viable market for it as a sustainable business.

All four airports - including Lulsgate - offer GA services, flying clubs and pilot training:-

- Bristol Lulsgate Airport (15 miles/33 mins)
- Cotswold/formerly Kemble (32 miles/40 mins), a leisure airfield specifically targeting 'enthusiasts' and Flyer magazine's Airport of the Year. Competitive charges and excellent facilities including a restaurant.
- Gloucester/Staverton Airport( 34 miles 40-50 mins),
- Cardiff (50 miles/55 mins)

We understand that Bristol Lulsgate has stopped adding to its existing based GA operations, however, even in the face of its apparently much higher charges there is some empirical web-based evidence that its services (provided by Bristol Flying Centre) still offer good value for visiting private pilots (see reviews at: <http://ukga.com/airfield/bristol>).

Finally, I cannot close without addressing claim that BAE Systems will make £300M from the development of the airfield - indeed our estimates do not anticipate reaching anything like a nine figure sum for this ten to fifteen year programme.

As part of the aviation industry too, myself and my colleagues are not without personal sympathy in this instance, but we cannot predict the outcome of proposal. I do however appreciate the opportunity to respond to the many points it raises and to provide a guide to the many considerations and constraints that will need to be faced by both BAE Systems and the Local Planning Authority in the near future.

I believe most of points have been addressed and hope you will find this information of value. Should you require any further clarification, please do not hesitate to contact me again at any stage.

Yours sincerely



Andrew Cheesman  
Director Real Estate Solutions  
BAE Systems Properties Ltd

Encs.

- Filton Airfield Options Report – BAE Systems – September 2011
- Extract from: Bristol Filton Airport Website, Local Forum <http://www.bristolfilton.co.uk/facg/> letter from Neil Higgs, Environmental Protection, S. Glos Council to Dr Doug Naysmith MP, Sept 2008