



Representation to the Examination in Public of South Gloucestershire Council's Proposed Core Strategy

Soundness 1

Paul D. Lee, 17 February 2012, v1.3

Introduction

This part of the representation looks at the Soundness of the Core Strategy with respect to the proposals for Filton Airfield.

The Soundness of the proposals falls down in a very simple manner:

The process seems to have been driven by what is best for a private company, not what is best for the community.

Everything else spins off this one key point. In the other parts of the representation (Legality and FOI Evidence), SFA has presented sufficient evidence that questions impartiality in making this decision. In particular SFA has presented evidence that shows willingness to accept BAE's proposals way before consultation had completed.

The following sections look at soundness in more detail.

Process

The process by which the Core Strategy has been arrived at with respect to Filton Airfield is, SFA believes, unsound.

The process seems to have been driven by what is best for a private company, not what is best for the community. This seems to have been exacerbated by the rush to cram the plans into the Core Strategy at the last minute.

Perhaps the best evidence to support this is a letter from TOR on behalf of BAE to the planning inspector dated 28 July 2011.

http://www.savefiltonairfield.org/eipdocs/SGC_BAE_FOI_14.pdf

In this letter TOR write:

BAE's discussions with SGC confirm the Council's willingness to accept this....

Other documents support this evidence. The process appears to have been driven by what was best for BAE long before the consultations had taken place. As a result of this, due process appears to have been forgotten about and alternatives appear not to have been developed or considered. When the consultations did occur, it appears as though they were nothing more than a tick box process, and the overwhelming views from the community were ignored.

More details and further evidence can be found in the "Legality" part of the representation.

Economic Assessment

As part of the decision making process affecting the closure of an important airfield, an economic assessment should have been carried out. Particularly given the forecast two to three times growth in air travel over the next fifteen years.

BAE are, possibly reasonably, trying to maximise their revenue from the sale of an asset which they no longer desire. SFA does not believe it should be the role of a planning authority to assist them in that. Instead the authority should come to a view on what would be best for the region. This view should be driven by input from the community, policies, guidance and neighbouring authorities.

There could have been an investigation into buying the airfield – possibly a consortium of one or more of the local authorities, interested aviation companies and even the people of the region.

The costs of alternative options should have been compared to the costs of implementing BAE's proposals. The forecast of profits on the land, from BAE themselves, appear to be modest for a company with their turnover. In a letter to Steve Webb MP, dated 25 November 2011, BAE director Andrew Cheesman wrote:

http://www.savefiltonairfield.org/eipdocs/11_11_25_BAE_LETTER.pdf

Finally, I cannot close without addressing Mr Neale's 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.

According to BAE's annual report for 2010, their revenue was £22 billion, their profit £1 billion. Less than £100 million over 10-15 years for a company of this size is almost negligible, being less than 1% of annual profits. It could be argued that new house completions over the last five years suggest that delivering this programme in 15 years may be optimistic.

SFA believe there ought to be scope for negotiation and exploring alternative proposals. Sadly, there is no evidence to suggest that there has been any investigation of retaining the airfield.

York Aviation were asked to provide a report on the airfield. In fact its scope was limited to reviewing BAE's own report. It was completed in around two weeks.

On page 21 of York Aviation's report, it states:

It is outside the brief for this report to undertake an economic impact assessment of the aviation activity at Filton, but if such a report were to be commissioned we would expect it to seek to compare the impact of closure of the Airfield with the employment prospects associated with potential land release for other employment-related purposes.

If the airfield was sold to another operator at a reasonable cost, BAE would make less overall profit, but it would be realised in a quicker time frame. It would also save all the cost of redeveloping the airfield – much of which will have to be borne by BAE. The company could then channel those resources into something that would hopefully make them more than 1% of their annual profits.

Any cost to the taxpayer of retaining the airfield should be compared to the cost of the taxpayer of the redevelopment proposals, and also the benefits to the local economy and community.

Concorde has been dumped at Filton for over eight years. How much income can that attraction earn in its own right?

How can it be that in taking a position on the airfield, the economic impact has not even been looked at? How can that possibly be sound?

Transport

In total, over 8000 houses are planned on and around the airfield site. This is made up of 3500 at New Charlton, 1000 at Haw Wood, 1000 at Cribbs Causeway, plus 2500 already in progress at Charlton Hayes.

This is clearly going to result in increased traffic in the area, and surely this presents a problem which is intractable. The area is surrounded by key routes which are already badly congested. We recommend the Inspector makes a few journeys in the area during the rush hours to see this for himself.

The solution being touted appears to be the return of passenger trains on the Henbury railway line. However, whilst SFA believes this is an excellent idea, we do not believe it will remove anything like all of the extra traffic which the planned houses will generate, and so it is not a solution.

The plans are therefore unsound.

Housing

It is not clear where the need for the extra houses has come from and whether it is deliverable.

The inclusion of the airfield site has resulted in the Core Strategy total allocation rising from 21,500 to 26,400.

The Residential Land Survey for South Gloucestershire can be found here:

http://www.savefiltonairfield.org/eipdocs/PTE110140_RLS_2011.pdf

Section 5 presents the new dwelling completions. Over the last 5, 10, 15 and 20 years, the average annual new dwelling completion rates have been 812, 776, 983 and 1,101 respectively.

Building 26,400 dwellings in 15 years requires an average annual rate of 1,760.

The current rate of new house completions would have to double.

Is that deliverable? Is it sound?

Aviation

Despite the recession, air travel is set to increase, with many sources forecasting a doubling by 2030.

http://www.savefiltonairfield.org/eipdocs/FUTURE_OF_AIR_TRANSPORT_2003.pdf

http://www.savefiltonairfield.org/eipdocs/AIRBUS_FUTURE_2011_2030.pdf

With this in mind, does it make sense to close such a valuable asset? Is it sound thinking to redevelop an airfield for houses?

As the airlines take up spare capacity at Bristol, general aviation, including business jets will be forced out. With the closure of Filton, Bristol could be left without a general aviation and business jet facility. That in turn could affect inward investment to the region.

Also, if there is to be a huge increase in air travel, then surely we should be looking to attract extra work to Filton? Surely a working airfield would help towards that goal?

Surely to close the airfield with major growth in aviation forecast is unsound?

Conclusion

- The plans seem to have been dictated by the desire of a private company to make maximum profit.
- The profit will not be particularly large for a company of BAE's magnitude.
- We are losing a valuable airfield when huge growth is expected in the aviation industry.
- The closure plan appears to go against all aviation policy guidance.
- The roads are too congested already and are unlikely to be able to cope with a further 8000 houses in the area.
- The houses may not be needed – the total requires the average completion rate to nearly double.
- There was enough land supply for enough houses without using the airfield.
- We are losing a whole chapter of our history.
- We are losing a whole chapter of our future.