



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

# **Soundness 2**

17 February 2012



## **SFA Representation To The SGC Core Strategy EIP**

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### 1. DEFINITIONS

The following are the definitions for the abbreviations used in this document:

- BA - British Airways
- BAE - BAE Systems Plc
- BCC - Bristol City Council
- EIP - Examination in Public
- FBO - Fixed Base Operator
- FoI - Freedom of Information
- FTO - Flight Training Organization
- GA - General Aviation
- LEP - Local Enterprise Partnership
- MoD - Ministry of Defence
- OCS - Original Core Strategy, March 2011
- RCS - Revised Core Strategy, December 2011
- RR - Rolls Royce
- RSS - Regional Spatial Strategy
- SFA - Save Filton Airfield Campaign Group
- SG - South Gloucestershire
- SGC - South Gloucestershire Council
- SHMA - Strategic Housing Market Assessment

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### **2. SOUNDNESS OF THE CORE STRATEGY**

In this section we will show that the rush to include the airfield land in the core strategy has violated multiple aspects of the following tenets of soundness:

1. Is the Core Strategy justified?
2. Is the Core Strategy effective?
3. Is the Core Strategy consistent with national policy?

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### ***2.1 Is the Core Strategy Justified?***

The tests of soundness in this category that we propose haven't been met are:

Is the Core Strategy:

1. Founded on a robust and credible evidence base, involving evidence of participation by the community and others with an interest in the area.
2. The most appropriate strategy when considered against reasonable alternatives. These alternatives should be realistic and subject to sustainability appraisal.

The following sub-sections explain how we think these tests have not been met.

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***Founded on a robust and credible evidence base, involving evidence of participation by the community and others with an interest in the area.***

### ***SGC Have Ignored The Concerns Of Their Neighbouring Council***

BCC has made it clear in several communications to SGC that it does not support any plans to convert the suburban roads within the Southmead and Henbury areas e.g. Charlton Road and Fishpool Hill into major cross site access routes to/from the Cribbs Causeway neighbourhood.

The following extract is from a statement made by Barbara Janke to the BCC Full council Meeting on 6/6/2011:

[https://www.bristol.gov.uk/committee/2011/ta/ta000/0906\\_mins.pdf](https://www.bristol.gov.uk/committee/2011/ta/ta000/0906_mins.pdf)

This council recognises that employment is key to Bristol's prosperity and that the decision to redevelop Filton airfield provides a vital opportunity to stimulate the local economy and create badly needed jobs, for workers in Bristol as well as South Gloucestershire.

The council, therefore, notes with concern the proposals to build a large housing estate on this important site, which it believes are unsustainable.

It is concerned, too, about the impact the proposed housing development would have on neighbouring wards in Bristol, such as Southmead, and in particular opposes any moves to build a through road, either via Charlton Road in Southmead ward, or via Fishpool Hill in Henbury Ward.

The council is concerned about any attempts to build additional road capacity between the A38 and major residential roads in north Bristol, which would lead to a great increase in commuter traffic. ...

Redevelopment of the airfield should only be pursued if it is clearly demonstrated as not harmful to the long term viability of the aerospace industry - would like to be able to see further evidence on a number of the assertions made in BAE report. ...

(Email: 29/12/2011 13:03 - [http://SaveFiltonAirfield.org/eipdocs/BCC\\_FOI\\_01.pdf](http://SaveFiltonAirfield.org/eipdocs/BCC_FOI_01.pdf))

Road access from Bristol should not create a through route.



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These serious concerns from their neighbouring council seem to have been completely ignored by SGC in their revised core strategy.

In addition there is little evidence that SGC have been at all proactive in involving BCC in their planning strategy for the parts of their core strategy that affect the Bristol area.

The only evidence we have found is in the FoI documents we requested from BCC, which show that BCC had to approach SGC to arrange a meeting and even then, SGC appeared reluctant to discuss anything with them.

This is surely in contravention of this test of soundness.

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### ***SGC Have Ignored The Concerns Of The Public***

Of the responses to the public consultation in October 2011, approximately 75% of them supported retaining the airfield and some had some very practical suggestions as to how to achieve this.

At the SGC Full Council Meeting in December 2011, SFA also presented a petition containing over 3,300 signatures collected from a full cross section of people from all over the South Gloucestershire and North Bristol regions supporting keeping Filton Airfield as an operational airfield. This amount of signatures was collected in a mere 8 weeks, at an average rate of almost 120 signatures an hour.

While collecting these signatures, SFA personnel experienced an overwhelmingly enthusiastic response for saving the airfield, from everyone who signed the petition. In fact, we were quite often swamped with people having to line up to wait to sign the forms, even though we had five petition forms in constant circulation. We even had people thanking us for standing up and fighting to save the airfield.

We believe this kind of response from the public should be taken very seriously by everyone involved in the decision making process regarding the future of Filton Airfield.

SFA submitted a substantial document to the public consultation in October 2011, laying out evidence showing why the rationale and approach to the closure taken by BAE (closely supported by certain SGC officers), was undertaken with questionable motives in order to steamroller their desire to build houses on the land through the planning process.

It also presented a very credible vision showing how Filton Airfield could be run as a profitable business that could continue to support both the heavy industry and other business sectors of the region.

SFA, the members of which are local residents, councillors, engineers and business people (i.e. all the types of people that this test of soundness suggests that SGC should be listening to), also approached SGC requesting a meeting to discuss their concerns about how the plans for the area would impact the North Fringe area.

SGC failed to reply and, as shown in the FoI information section of the referenced document in Section 5, have been very reluctant to disclose any information to us all through the process, including excessive stalling in releasing any information in reply to our FoI requests.



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All of these concerns and suggestions appear to have been completely ignored by SGC, as the RCS appears to show no consideration for any suggestions made during the consultation with regard to the North Fringe area. On the contrary, it has been revised in a way that has taken it to the opposite extreme from the wishes of the current residents and business people of the North Fringe area.

This surely, is also in contravention of this test of soundness.

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### ***The North Fringe Area Cannot Cope With More Houses***

The OCS states that consideration must be given to ensure that neither too many houses nor building in the wrong area is encouraged:

“... it is imperative that housing growth in South Gloucestershire is contained within sustainable limits and set in the context of the vision and objectives of the West of England. ... too much housing, and/or housing in the wrong places, will undermine all the effort being made to meet the employment and economic needs of all residents in the sub-region”<sup>1</sup>

The OCS also shows that the North Fringe area has an infrastructure that is inadequate for servicing anything more than the maximum number of houses it proposes:

“The Sustainability Appraisal Report ... explains the consequences of developing in alternative locations and shows the unacceptable effects, for example on travel patterns or on valuable environmental or heritage assets, that have informed the assessment process. In addition the Core Strategy is supported by the Strategic Housing Land Availability Assessment (December 2010) which demonstrates that the sites which make up the 21,500 housing figure are suitable, available and deliverable.”<sup>2</sup>

and:

“To depart from the Plan’s spatial strategy would be to accept unsustainable patterns of development. This would be contrary to national guidance which requires the protection and, where possible, the enhancement of the quality and character of the countryside, and the duty to support sustainable development. The removal of top down targets, as formerly set out in the RS enables the Council, based on the local technical evidence it has prepared, to develop a strategy for the district which gives stronger consideration to environmental constraints and more fully reflect the principles of sustainable development.”<sup>3</sup>

If this is true, then surely, adding more houses to the already overstretched system would just be irresponsible?

The original core strategy goes to great lengths and provides convincing proof that the North Fringe area cannot cope with more houses than it had allocated for that area:

[Redacted text]

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“Included in the Core Strategy is a proposal for 21,500 homes to be built in total between 2006 and 2026. Around 3,350 of these had already been built by 1st April 2010. Of the remaining 18,150, over 12,200 have already been granted planning permission or allocated in the South Gloucestershire Local Plan from 2006. The Strategic Housing Land Availability Assessment (December 2010) has identified a 15.6 year land supply in the District as from April 2011.”<sup>8</sup>

If there was already a 15 year land supply in April 2011 (which didn't include the airfield land), then that is obviously sufficient for servicing the needs of the core strategy. Any extra land that subsequently becomes available should surely be considered only for alternative uses, not for additional houses.

To add another 5,700 houses into the plan, would surely just overwhelm the ability of the area to cope with the demands of the resulting population.

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### ***The Core Strategy Already Proves The Agreed Maximum***

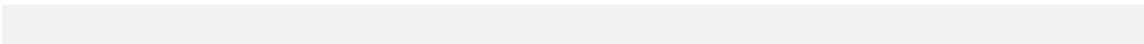
The following paragraphs from the OCS show that, without a significant improvement in the infrastructure, 21,500 houses is the maximum that the area can sustain.

“The Core Strategy’s alignment with high level strategic investment programmes ... recognises the need for realism about what can be delivered in this new and challenging financial environment, and makes best use of and co-ordinates private and public investment.”<sup>4</sup>

“... based on developers own assessment of future delivery, it is very unlikely that build rates and the scale of construction activity that was seen at Bradley Stoke would be repeated in the current and foreseeable future. It is therefore unrealistic to assume that these conditions can be replicated for each year up to 2026. This adds considerable weight to the Council’s view that, in establishing the housing requirement, the ability of the market to actually deliver must be a key consideration, especially when the impact on environmental sustainability and the openness of the Green Belt are the high level factors that go to the heart of establishing the planning balance.”<sup>5</sup>

“Is housing growth sufficient to support likely economic growth levels? The housing total of 21,500 was judged against three alternative local economic forecasts each tested at three potential national growth scenarios. It was concluded that the 21,500 dwellings proposed in the strategy for development would result in a ratio of new dwellings to jobs of between 1.6 and 0.98 and thus provide sufficient scope for accommodating future economic growth in South Gloucestershire.”<sup>6</sup>

“The conclusion reached is that the latest projected population growth forecasts are not an acceptable basis for justifying higher levels of housing growth and that the Core Strategy proposal for 21,500 dwellings is linked more closely to employment growth within a regime of plan, monitor and manage.”<sup>7</sup>



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### “4. Assessment of the core strategy total housing proposals

In accordance with guidance in PPS3 the key tests here are:

- A. Is housing growth sufficient to support likely local economic growth levels?
- B. Are SHMA affordable housing requirements to 2026 likely to be achievable?
- C. Is housing growth sufficient to meet trend population growth requirements?

Assessment A: Is housing growth sufficient to support likely local economic growth levels?

5.2 The Core Strategy housing total of 21,500 for 2006-26 was tested against three sets of alternative local economic forecasts, but all based on three potential growth scenarios for the UK as a whole (see Appendix B for further details). These are compared with a prerecession longer term trend projection.

5.5 On this basis it is concluded that, the total of 21,500 net new dwellings proposed in the Core Strategy would provide sufficient scope for accommodating future economic growth in South Gloucestershire, supporting potential for a greater degree of local self containment as regards commuting flows into the District.

Assessment B: Are SHMA affordable housing requirements to 2026 likely to be achievable?

6.3 Taking account of the affordable housing delivery expected in the period 2010 to 2026, 5,330 affordable units are expected to be provided (Table 2). Building 333 new affordable houses annually would represent an important achievement for the Core Strategy and compares well with the average of 207 pa units built between 2006/07 and 2009/10.

6.4 In conclusion, the total of 21,500 dwellings represents a substantial improvement in the potential for providing affordable housing given the current financial climate.

Assessment C: Housing growth is sufficient to meet trend population growth requirements

7.3 ... the Core Strategy proposal for 21,500 dwellings, linked more closely to local employment growth within a regime of Plan – Monitor - Manage and subject to periodic review in the future, is a more sustainable and deliverable proposition for South Gloucestershire.”<sup>9</sup>

As there is not enough space left in the North Fringe area to provide an adequate infrastructure, even with the addition of the airfield land, especially if most of it is taken up with more houses, then it makes no sense to add any more.



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As the original core strategy was approved by the SGC councillors with an overall consensus that 21,500 houses was the maximum sustainable amount of houses and there has been no material change in the sustainability factors, then a rubber stamping approval of another 5,700 houses surely violates SGC's own sustainability rules, as approved by a majority of SGC councillors.

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### ***The Proposed Level of Housing Will Infringe on Business Sites***

The level of housing proposed by the core strategy and the lack of a clear direction as to where those houses will be sited in the area, makes one wonder how close to the aerospace industrial complex they will be allowed to be built.

Without a clear direction as to the limits of where any housing will be allowed to be built, any residential creep is likely to result in the businesses in the industrial complex being forced to move their operations elsewhere, resulting in less jobs in the area and hence less ability to afford the proposed housing.

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### ***Does Charlton Hayes Set A Bad Precedent?***

These pictures are examples of the current housing that Bovis has already built on the Charlton Hayes site.

If this is the type of development that house builders are hoping to replicate in the Cribbs/Patchway Neighbourhood, questions must be raised about the sustainability and quality of the resulting community.

Do you really think that highly qualified, highly paid engineers would choose to live in houses or a neighbourhood like this, just because they are close to Airbus?



If the types of houses in poor areas and more wealthy suburbs around Britain are compared, these are the sort of houses that you find in areas that eventually become run down areas with a multitude of social problems and which end up being a drain on the resources of the local councils.

Is this really what SGC had in mind when they approved the planning permission for Charlton Hayes? Is this what the current and future planning regulations for the area are aimed at creating?

The question that should be asked is:

“If this is what Bovis and the other corporate property developers have in mind for the rest of the site and the airfield land, should the proposed core strategy be approved as it stands or should SGC be told to re-draft it such that it prevents more of the same nondescript, cheaply produced, uninspiring, characterless houses, which would rapidly become a vast drain on theirs and BCC’s resources?”

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***The most appropriate strategy when considered against reasonable alternatives. These alternatives should be realistic and subject to sustainability appraisal.***

***The BAE/York Reports are of Debatable Soundness***

### **BAE Options Report**

This report was commissioned by BAE Systems at the last minute in September/October 2011, following a request from SGC, in order to try to justify the decision BAE took many years before to close the airfield. SGC officers contributed significantly to the creation of this report.

In our opinion, it has many flaws, which indicates that it was a hastily put together document and is based on several debatable suppositions.

The main supposition is that the airfield would operate on only one income stream and hence the report only considers each income stream on a stand-alone basis. Has there ever been a successful airfield or business, for that matter, that has had only one income stream?

During its lifetime, Filton Airfield itself has always earned income from many types of operations based on and around its site.

The Options report states:

“BAE Systems is a public limited company accountable to its shareholders and sustaining this poor position is unviable and unacceptable to the company.”

Most businesses faced with this decision would not choose to destroy the asset, but attempt to either invest in it or sell it to another company who felt that they could make it profitable.

On the contrary, SFA have obtained proof that, during the last ten years, several companies have approached BAE to use the airfield and have been actively turned away. The evidence of this was provided in our submission to the previous public consultation in October 2011 and is again covered in the FoI information section of the referenced document in Section 5.

SGC could facilitate the decision to sell the airfield by choosing to make it clear that they would not approve any change of planning use request, as they would prefer that the airfield remained operational. This would force BAE to look at selling it on to another operator instead of a to a property developer.

Therefore, any suggestions that SGC cannot influence a “commercial decision” by a private company are absolute nonsense. They are the local council, so they do have the power to influence a lot of what happens in the area they are responsible for, especially in this matter.

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Can a report assessing a business' viability by considering only one income stream at a time and failing to assess the most realistic option of all the potential income streams operating together i.e. a mixed use business package, be used as a basis for making such important decisions as to whether that business can be profitable and has a future?

The obvious answer is no, it cannot, as it is clearly incomplete. Therefore, any other document based on it e.g. the York Aviation appraisal of the Options Report, should also be viewed as questionable.

### **York Aviation Appraisal of the BAE Options Report**

This report was commissioned by SGC in November 2011 as a review of the BAE Options Report to validate it as an adequate assessment of the unviability of Filton Airfield. This was done following concerns raised by members of the public and parish councillors that SGC were making decisions based on a privately paid-for report.

It was produced by York Aviation in just two weeks and the scope of the appraisal was placed on the SGC website just two days before the final draft of the report was due to be released, giving no opportunity for the public to comment on the brief given to York Aviation. Approaches made by SFA to ask questions about the scope of the appraisal were ignored by SGC.

The following points are SFA's opinion on the main contentions of the York Aviation report. The full set of comments can be found on the SFA website at:

<http://SaveFiltonAirfield.org/eipdocs/York-Aviation-Report-Comments.pdf>

1. Houses do not produce long term, sustainable jobs. Neither do they attract jobs to an area in and of themselves. So the constant statement that houses need to be built to create jobs and rebuild the economy is false.

Businesses bring jobs to an area and an area like Filton that has been built up around a huge industrial complex for over 100 years, will not attract new businesses or entice existing ones to stay, if the residential sprawl is allowed to surround the areas where they operate.

On the contrary, residential sprawl is more likely to persuade the existing businesses to relocate elsewhere and any potential new businesses to not consider Filton as a viable area in which to do business.

2. How will the closure of the airfield secure the long term legacy of the aerospace industry? GKN have already attempted to take all the manufacturing to their other sites when they took over the Filton manufacturing operations. It was only prevented by a big outcry from the unions.

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In fact they've already succeeded in moving the A350 work to their Easter Compton site, to the detriment of their workers, who have ended up with inferior contracts compared to the ones they had at Filton.

It is feasible to assume that they are looking for another opportunity to try to move the rest of it and the closure could give them the excuse to plead the uneconomic and risky nature of transporting the larger wing parts to their destination by multiple modes of transport.

Manufacturing staying at Filton is by no means assured, in spite of the closure.

3. Were the aerospace companies asked the right questions? There only ever seems to have been questions asked regarding what they feel about the closure of the airfield e.g. "Would the closure of the airfield affect your current operations?" Of course they're going to say no to that question.

No-one has asked them how they would feel about using the airfield, if it offered the facilities they would find useful e.g. proper, long term contracts, a stable future and a business friendly environment.

Or are they concerned that the answer to this question would totally negate their argument about the viability of the airfield?

4. It's not enough to just keep saying "the closure offers opportunities" – what are they? Without any knowledge of what these "opportunities" are, how can this argument be used to substantiate the closure?
5. The lack of demand was deliberately created by BAE as a result of their attempt to run the airfield down, so it cannot be used as an accurate reflection of the real marketplace. The available evidence shows that no serious marketing or follow up was done with the airfield by BAE. Therefore the conclusion should be drawn that with proper marketing and follow up, significantly more business would have been secured for the airfield during the same period.

SFA has been reliably informed that all enquiries were either dismissed or not serious considered by the management of BAE Systems (Aviation Services) Ltd. – the company responsible for the airfield operations.

SFA has obtained numerous examples of BAE turning away new enquiries to use the airfield or imposing contractual conditions too restrictive to allow any business to seriously consider using it.

6. The postulation in the report that the closure decision should be based on a case of a "clear need" for Filton Airfield is neither a fair nor a realistic judgement.

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A far more realistic and fairer basis for the decision should be a judgement of a “Clear Potential” for it to be successful in its own right, rather than predicating it on whether the aerospace companies really need it.

If a business has a clear potential, should it not at least be given a chance to prove itself, before it is written off?

### **In Conclusion**

The BAE Options report only looked at each income stream separately and ignored the obvious and more realistic option of all the income streams operating together.

The York report only reviewed the options covered in the BAE report.

Both reports state that the scope dictated by the commissioners of the reports did not allow them to investigate the economic viability of Filton Airfield.

Surely, this in itself shows that neither report could be fit for the purpose of using them to prove that the airfield is not viable?

Therefore, if these reports cannot be relied upon to give a fair view and hence should be disregarded. This leaves the core strategy without a valid assessment of the viability of Filton Airfield, so the supposition in the core strategy that the closure decision should be accepted without question is clearly flawed.

**Without a valid assessment of the viability of the airfield and hence the viability of the closure decision, then the test for soundness of this part of the RCS has clearly failed.**

To provide a valid test for soundness, a truly independent report with a scope that includes an impartial economic assessment of the profitability of the airfield should be commissioned and there should be enough time given to the project to make a proper and thorough assessment, rather than just being a copy and paste compilation exercise of industry facts and figures.

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### ***An Operational Airfield is a Realistic Alternative***

Rather than unquestioningly accepting the closure of the airfield and the clearly contrived supporting evidence for it, as an excuse to increase the housing quota for the North Fringe area, as is shown happened in the FoI information section of the referenced document in Section 5, SGC should have given far more serious consideration to the option of keeping Filton Airfield as an operational airfield.

As we show in Section 6, Filton Airfield can be run as a profitable and successful business, if it was in the right hands and had the support of the local council.

Given those two factors, it could very easily thrive and contribute considerably to the economy of the whole region. Considering the aviation industry is one of the few industries that is thriving in the current economy, it is likely to be the only one that could support the area through the tough times ahead.

Allowing the closure of the airfield without making any effort to try to save it, would be massively detrimental to the whole region. As we have shown in our submission to the October 2011 public consultation, contrary to the perceived wisdom of the SGC officers, the aerospace industry needs an accessible and operational airfield to enable it to thrive.

Without such an airfield, the Filton branch of Airbus will no longer be considered by the rest of the business as a serious contender for future contracts. Indeed, recent news has shown this to be true, with the loss of several contracts to other sites both within the UK and abroad, which would have guaranteed over 1,000 jobs in the area.

Projecting this into the future, the reliance of the core strategy on the aerospace industry to provide the lion's share of the jobs of the future, while at the same time stripping away the foundations of that industry, surely has to be regarded as a prime example of ill-advised short-sightedness.

The retail and service industries that make up the majority of the rest of the economy of the neighbouring Filton/Patchway area are traditionally the main businesses that suffer the most in a depression. Therefore, it would be a monumental mistake to gamble the whole of the future of the region on those industries without any Plan B.

Clearly, the best option, to guarantee the continuation of the aerospace industry with a large enough presence to provide the required amount of jobs to support the population that the core strategy is proposing to attract to the area during the austere times ahead, is to support the continued presence of Filton Airfield.



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The last 10 years of operation under the stewardship of a management who obviously had no regard for the well being of the airfield business, clearly cannot be used as proof that it has already been given a chance and failed.

The business needs to be given a chance with a management that has a track record of having the operation of an airfield as their prime concern, without the pressure of a higher level management that wishes to only maximise its return on the value of the underlying land. It should also have the full support of the local councils to maximise the chance of success.

If it can make a profit for several years running after given at least 5 years to re-establish itself, then this would prove that Filton Airfield is not a lost cause and can be turned into the success that it has the potential of being.

### ***GA and Business Jet Aircraft Need A Base Close To Bristol***

Without Filton Airfield, there will be no place in the Bristol area for GA and business jet aircraft to be based.

Every modern city needs to provide a facility for GA and business jet aircraft within easy reach of its business centre, even Bristol.

No airfield other than Filton is so ideally placed to provide this facility for business use.

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### ***2.2 Is the Core Strategy Effective?***

The tests of soundness in this category that we propose haven't been met are:

The Core Strategy should:

1. Be deliverable.
2. Have sound infrastructure delivery planning.
3. Have no regulatory or national planning barriers to delivery.
4. Be coherent with the strategies of neighbouring authorities.

The following sub-sections explain how we think these tests have not been met.

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### ***Be deliverable***

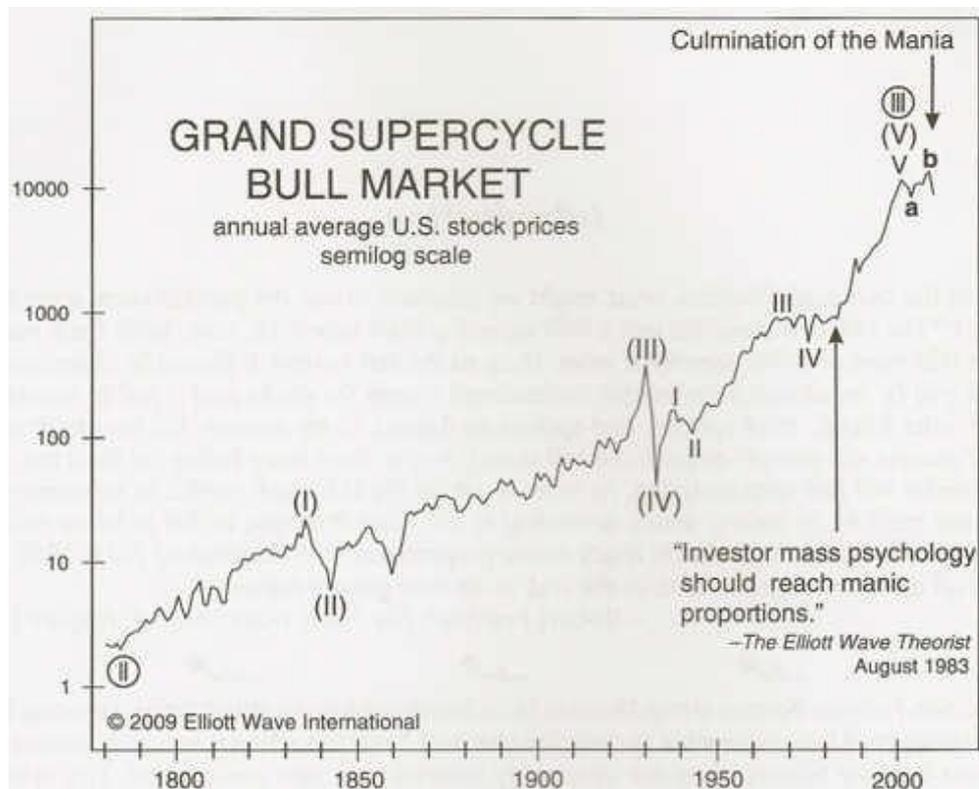
#### ***The Economy Will Take A Long Time To Recover***

Although government sponsored economists are trying to paint a rosy picture for the economy over the next few years, many experts in the field of stock market projection have shown that there is a long way to go, before any significant recovery will be seen. On the contrary, there is ample proof to show that, over the next 5 to 10 years, it will get much worse than the state we are currently seeing it in.

The most reliable form social and stock market prediction is Elliott Wave technology, which is based on crowd psychology.

The most notable expert in the field of Elliott Wave technology is Bob Prechter, who has an unprecedented track record of accurately predicting what the stockmarket, and hence the economy, will do and when. Since the 1970s, he has predicted quite accurately and consistently, using Elliott Wave technology, what we have now seen play out.

The following image shows the internationally agreed wave count in the overall picture of the largest magnitude wave that started in the latter part of the 1700s.



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In terms of Elliott Wave technology, markets trend in 5 waves and are followed by a 3 wave retracement.

As shown in the above image, the up wave trend of the largest degree (Grand Supercycle) finished in 2000 and the market has been in a declining retracement (a-b-c) ever since.

We are now in the last wave (c) of the retracement, which started as the 2007/2009 “credit crunch” as it was called, which is predicted to finish around 2016 to 2018 in the region of waves III-IV, as is normal for a flat. This would mean, for example, that the Dow Jones Industrial Average would end up at around 400 (at the time of writing, it was around 12,700), at which time we will have seen a lot of devastation of the global economy. It will take at least another 10 years beyond that, before we will see any real shoots of recovery.

That takes this scenario well beyond the period for which the core strategy has been designed. This means that the whole period of the core strategy falls within the time when the economy will be either heading for or at the bottom of the cycle.

If this is the case, then the demand for housing and the ability to buy, will be the lowest in living memory and likely on record too. There will be many more people out of work, far fewer jobs available and even less credit available from the financial institutions that survive the devastation.

As already pointed out in the original core strategy, any demand projections based on a linear progression of figures obtained during an unprecedented period of growth, which has so clearly now ended, should be discarded as totally worthless. As seen in the graph above, the global economy is expected to nose dive to an unprecedented low during the next 5 to 10 years, so even the conservative estimates of demand used in the original core strategy should be viewed as highly optimistic.

Therefore, to add more houses to an already over-optimist amount, in an area that would struggle to cope with even that, is surely asking for trouble.

So, if there are far fewer people in the area able to afford to buy houses, then it would surely be a huge mistake for SGC and any planning inspector to allow an excessive amount of houses to be built at a time when there will be very little chance of finding people to buy or even rent them.

A far more sensible approach would be to postpone any significant house building until there are signs that the economy has actually bottomed and recovered detectably and only then to start building in modest amounts.



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To do anything else, would be irresponsible and would see thousands of derelict houses and an area rife with crime and huge social problems, for both SGC and BCC, with all the associated costs involved in dealing with them.

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### ***The Deliverability of the Extra Housing Requirement is Questionable***

The Residential Land Survey 2011 shows that there has been an average house build of only 776 houses per annum in the South Gloucestershire area over the last 10 years. This was during the boom years of the economy when money and finance was freely available.

At this build rate, it would take 34 years to complete the 26,400 houses required in the RCS. It would take a steady rate of 1,885 houses built annually to meet the proposed target in the RCS in the 14 years left within its time span.

Even discounting the 4,064 already built since 2006, it would require 1,595 houses per annum to be built. At the current build rate, the discounted amount of houses (22,336) would take 28.5 years to complete.

As shown above the likely economic scenario for the duration of the core strategy is for the global economy to shrink far more than has been experienced at any time in living memory.

This would mean that finance for property development companies and mortgages for home buyers will be even harder to come by than is being seen at the moment.

This would make it hard for the average house building figure shown above to be exceeded by any significant degree, despite any relaxation of planning consent guidelines.

As has been seen over the last few years, planning rules or consent don't dictate how much development takes place; the availability of finance does. If the finance is not readily available, property developers cannot proceed with any developments, however much they would like to.

On the other side of the fence, if house buyers cannot easily obtain mortgages, the demand for new houses will not be there. If developers cannot sell the houses they build, it makes little commercial sense to build any more until the current ones have been sold. An example of this conundrum can already be seen happening with the Charlton Hayes development on the former Filton Northfield site.

In the two years since this development began, only about 80 houses have been completed and most of those have been sold to the local housing association and populated with housing tenants, who have been causing various social concerns for the Patchway Councillors and residents.

In addition, Bovis Homes have already been lobbying the local councils to relax their social housing requirements for the site, because of the difficulty they are having in selling the houses. As shown in the following article, other developers have also been trying to side-step their development obligations in similar ways:



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<http://www.bbc.co.uk/news/uk-england-bristol-15673965>

So, considering the current average house building rate, what it would need to be to achieve the ambitious target in the RCS and the likely difficulty, to both the developers and house buyers, in obtaining the required level of finance during the period of the RCS, we strongly suggest that the deliverability test of soundness has also failed.

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### ***SGC Have A Get Out Clause***

In the RCS, SGC make it clear that should BAE change their mind about their operational need for the airfield, the future housing provisions of the Cribbs/Patchway Neighbourhood would not be matched by utilising land in another area. The deliverability of housing numbers therefore appears to be based on the current business desires of BAE, not the firm availability of land.

“However, should BAE Systems decide against releasing the Airfield for development, the Council will not seek to compensate with alternative housing provision elsewhere. Rather, the Council may consider the need to undertake an early review of the Core Strategy to respond to this change in circumstance should it arise.”<sup>10</sup>

One might conjecture, therefore, that if the airfield was not included in the core strategy and it was made known that a change of planning use would not be considered for approval, because its potential to support the economic recovery of the region as an active airfield was recognised as being far more beneficial, then, as BAE would not be in a position to sell the airfield for housing development, it would have to look at alternative options.

**SFA strongly encourages the planning inspector to take this approach and recommend that the core strategy proceeds without the inclusion of Filton Airfield as a housing development site, but protected for use as an active and properly managed airfield business.**

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### ***Have Sound Infrastructure Delivery Planning***

#### ***The Infrastructure of the North Fringe Area Is Inadequate***

The transport infrastructure of the North Fringe area can barely cope with the current level of vehicles and it's well known that the area already becomes gridlocked during the rush hours.

Without substantial improvement, the roads in the area would become chronically congested if another 10,000 houses are added to what is already there.

After the proposed level of additional housing is added, there will simply not be enough land available in the area to create an adequate infrastructure to cope with the additional demand, both on local roads and national trunk routes.

#### **IDP Transport Evidence Base:**

5.7. The Highways Agency, which operates these motorways, is concerned about the adverse impact of local traffic generation. To mitigate this, several capacity improvement schemes have been implemented in the last decade; however, the scope for further improvement is now limited by physical constraints (and consequent cost). Therefore, the Agency has developed a scheme to manage the M4/M5 around Bristol; the Managed Motorway scheme will see variable speed controls and hard-shoulder running to smooth traffic flow and increase throughput.

Adding a variable speed control system to the motorway system around the M4/M5 interchange might seem like a viable way to control the traffic.

However, considering it's the volume of the traffic trying to negotiate the traffic light and roundabout systems at the junctions that causes the blockage during the rush hours, not the speed, any speed control measures will clearly have little effect when the average speed of the traffic is already very low or zero.

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5.8. The main local roads are the A4018, A38, A4174 Ring Road, B4057, B4427 and Highwood Road, linked by various distributor roads. The main junctions include:

- A38/Bradley Stoke Way/Aztec West;
- A38/B4057 Gypsy Patch Lane;
- A38/A4174/B4050 (Air Balloon Roundabout);
- A4174/Filton Avenue;
- A4174/Great Stoke Way/MoD;
- A4174/Coldharbour Lane;
- A4174/B4058 at Hambrook;
- B4057/B4427;
- Lysander Rd/Merlin Rd (Cribbs).

All the main roads and junctions are congested to varying degrees and have no spare capacity to cope with recurrent or exceptional traffic conditions in extended AM and PM peak periods.

As there are no places to add any new major entry and exit points to the North Fringe area, any extra junctions or roads introduced can only either add more congestion or just shuttle the traffic from one congested part of the area to another.

5.14. There is ongoing or committed development in the North Fringe at several sites (allocated in the South Gloucestershire Local Plan), which will provide additional transport infrastructure:

- Charlton Hayes (formerly Filton Northfield), which will provide a new link road between The Mall with the A38 Gloucester Road (the San Andreas Link Road, opening December 2010);

The new link road has been in operation since December 2010 and, as shown by the continued total blockage of the Cribbs Causeway Mall area at its busiest times e.g. Christmas and weekends, it has done nothing to alleviate the traffic problem.

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Also, the closure of Highwood Road to through traffic leaving only one cross-site route has manifestly failed to provide a solution to the rush hour blockage of the main arteries.

5.15. GBBN has/will fund several improvements in the North Fringe, including at the A38/Bradley Stoke Way/Aztec West, A4174/Great Stoke Way/MoD, the A4174 between Coldharbour Lane and the M32 and at M32 Junction 1. These improvements are targeted at improving bus journey time reliability, which can be badly affected by congestion in the area. GBBN will be completed in spring 2012.

As shown by regular letters and commentary in the local papers, the experience of most commuters of adding the new bus lanes to the ring road has proven to only exacerbate the traffic congestion problem during the rush hours by concentrating the same amount of traffic into a smaller road footprint.

So, adding bus lanes to the main arterial roads in itself cannot continue to be hailed as the solution to the congestion problems of the North Fringe area.

7.16. ...The release of the airfield for development presents opportunities to improve north-south connections between Patchway & The Mall areas and land south of the airfield and Bristol City. The key strategic infrastructure requirement would include:

- Subject to a satisfactory business case, the provision of station(s) and the re-introduction of passenger services on the Hallen Line/ Henbury Loop;
- Increased rail service frequency in the wider area (subject to a satisfactory business case being established at a point in the future);
- Contributions towards the Greater Bristol Metro major transport scheme and improvements to the rail stations at Parkway and Patchway;

The above points are discussed in the following paragraphs.

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### ***The Greater Bristol Metro Project Should Not Be Relied Upon***

The Greater Bristol Metro project is well known to have had many problems in getting off the ground and, despite much effort by a variety of parties, is still no nearer to becoming a reality.

In fact, as shown by the below extract from the core strategy itself, the project has very little support from either local or national government and so should not be relied upon to deliver any congestion relief to the area.

7.3. ...

- The Bristol Temple Meads to Emersons Green Rapid Transit via Fishponds and Mangotsfield, a bid for £74m towards a scheme constructed 2018-2021;
- The Greater Bristol Metro that would see the introduction of a half hourly rail service as a minimum over lines from Bristol Temple Meads to Bristol Parkway and Yate, Westbury via Bath and to Westonsuper- Mare, a bid for £17m towards a scheme implemented 2017-2020.

**These two schemes have now been excluded from the DfT's programme of major transport schemes; further guidance is expected by the end of 2011.**

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### ***Having Both Passenger and Freight Trains on the Avonmouth Line May Be Difficult***

Local politicians have mooted the idea of reopening the Hallen rail loop (between Avonmouth and Filton) to regular passenger rail services in order to alleviate the traffic burden on the North Fringe road network.

However, trying to shoehorn passenger services onto this line neglects its imminent planned use by the Bristol Port Company and Freightliner Ltd. to transport 1,600 twenty-foot equivalent units (TEUs, i.e. shipping containers) per day out of the new Deep Sea Container Port (DSCT) at Avonmouth by rail. This will be a 24/7 operation.

The following is an explanation of how the Avonmouth to Filton stretch of track would have to operate:

The signalling system's "block sections" don't allow multiple trains on the same section of track at the same time.

Consider the single track section Narrowways - Clifton - Avonmouth (X - Y - Z). As it stands today, a train at X can't proceed to Y until the section is clear. So at best that's 10 minutes. However, any train at Z would have to wait until either both trains get to Z (which incurs delay to one train at Z) or the first train gets to Z (which incurs delay to one train at Y). So, you're stuck with six paths per hour - either six in the same direction or three in either direction or some other combination.

This section of the line (all the way to St. Andrews Road) is single track and the block sections are the limit - no freight trains normally use this section.

From Hallen to Filton, there are more signals (block sections), but here the problem is the mixed speeds of the trains. The heavy freight trains from Avonmouth are over 2,000 tonnes in weight and they crawl up the heavy grade to Filton (usually around 15-20mph) - for six miles. At 15mph that's 24 minutes.

A passenger train, perhaps, averages 30mph over the same section, so it would make it in 12 minutes. Therefore the freight train needs at least a 12 minute head start on the passenger one. More realistically 15 minutes.

Then you need to consider what happens when they get to Filton. Is there room to move the freight train out of the way, while it waits for an onward path to London or South Wales? If not, your passenger train is in trouble.

Anything more than one passenger train per hour in each direction on the Henbury Loop would be ambitious.



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There would be 20 minute intervals from Bristol to Avonmouth, where one train per hour would reverse and go back. A second train would continue to Severn Beach and reverse. A third train could take the Henbury loop.

Clearly, that's not a solution to 9,000 extra homes on and around the airfield site.

As the core strategy specifies that the requirement for this option is dependent on a viable business case being presented, any transport infrastructure improvement plans should not rely on this as an option, because the above explanation makes it clear that such services would be impossible to implement without very high levels of capital investment.

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***Have no regulatory or national planning barriers to delivery.***

***Be coherent with the strategies of neighbouring authorities.***

These two tests of soundness are covered in the referenced document in Section 5, which deals with the legality aspects of the core strategy.

SFA believes that these tests have also failed, due to the behaviour of SGC officers during the preparation of the core strategy and their desire to rush it through the planning process at any cost.

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### ***2.3 Is the Core Strategy Consistent with National Policy?***

The tests of soundness in this category that we propose haven't been met are:

The Core Strategy should:

1. Be consistent with national policy.
2. Where there is a departure (i.e. inconsistency), the Council must provide clear and convincing reasoning to justify their approach.

In attempting to accommodate an increase in house-building quotas, SFA believe that SGC have failed to provide any reasonable justification of their apparent deviation from certain aspects of national planning policy, as explained in greater detail in the referenced document in Section 5.

Again, SFA believes that these tests have also failed, because of the same reason as the previous two tests.

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### ***Landowners and Developers are Abusing a Loophole in Planning Law***

One point we must make about planning policy under this heading is the way that the change of planning law in 2006 to classify airports and airfields as Brownfield sites has been used by landowners and developers to enable them to vastly inflate the value of the land on which regional airports are sited.

This re-designation does not adequately define what types of airport/airfield can be viewed as a Brownfield site. It's arguable that the original intention was for airfields that have long since been closed and remained vacant to fall under this classification, rather than currently operational airports or airfields.

This lack of clarity is clearly being exploited by landowners and developers in order to run down and close perfectly viable and operational regional airports in order to cash in on the surge in value after the local authority has re-designated the often substantial land bank that accompanies airports/airfields.

Examples of this exploitative activity can be seen with the recent closures of Plymouth and Woodford airports. BAE themselves also have a history of closing and re-developing airfields they inherited from the nationalisation of the aircraft manufacturing industry in the 1970s.

The following quote is from the RSS Sustainability Document of 2008:

“...the point of building housing on ‘brownfield’ rather than ‘greenfield’ land is to clean up and regenerate derelict or degraded environments, to save soils, landscape and wildlife from being lost to development, and to encourage development within urban areas (where amenities are accessible with less travel)...”<sup>11</sup>

Clearly, this definition cannot be applied to Filton Airfield, as it is still an operational airfield.

One might therefore be rightly suspicious of BAE's actions over the last ten years or more to make it appear as if Filton Airfield is unviable and should be closed to pave the way for their stated intention of submitting a planning application, in 2013, for the re-designation of the land as suitable for housing. This stated intention is shown in the FOI information section of the referenced document in Section 5.

SFA believe that this planning loophole should not be allowed to be used by airport landowners to effectively control how local councils treat their assets, such that the only real winners are their shareholders, while the local population and area has to live with the consequences for many decades into the future.



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We would ask that the planning inspector gives serious consideration to this issue in relation to Filton Airfield and, if it's felt that this has had an influence on the decision making process, then SFA strongly suggests that Filton Airfield should be given the protection afforded to it in the OCS of March 2011 i.e. as an operational airfield.

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### **2.4 In Summary**

One must ask that, as there was so much effort and ink put into the OCS to propose and prove that 21,500 is the maximum amount of houses that the area could sustain, why should an extra 5,700 houses in the same area suddenly be an acceptable new maximum sustainable amount, just because an extra parcel of land becomes available?

The new version of the Sustainability Document doesn't adequately explain how the area can sustain the extra amount of houses, when the original one showed convincing proof that it couldn't. Therefore, its soundness and fitness for purpose should surely be questioned.

In addition, as we have shown in this section, there is and will be no requirement for any further housing over and above that which was shown to be the maximum sustainable amount for the area in the OCS.

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### 3. CONCLUSION

In conclusion, we urge the planning inspector to view Filton Airfield as an essential asset not only to South Gloucestershire, but also to Bristol and the South West region as a whole and not as a quick and easy way to meet an unrealistic housing quota.

There are plenty of reports extolling the importance of regional airfields and airports to the nation's prosperity. With its relative proximity to the London airspace, Filton Airfield has the potential of being one of the most prominent of these regional airfields, if the planning and political will is put behind it.

To paraphrase a section of the US Declaration of Independence: "If something is wrong, those who have the **ability** to take action, have the **responsibility** to take action." This statement can be applied to many situations beyond the original intention.

As we have shown in this document, there are numerous omissions and inaccuracies in the amended version of the core strategy and failings in the process by which it was produced. Highlighting these, as we have done in this document, should give the planning inspector the basis to take action to ensure errors are corrected and the correct actions taken to safeguard the prosperity and future of the North Fringe area.

We propose that the correct action in this case is to only approve the core strategy if it protects the future of Filton Airfield as an operational airfield, whose associated economic activity and myriad associated businesses would provide the types of high-quality jobs that would support the economic regeneration and recovery of the region, that the Government is so strongly promoting.

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### 4. REFERENCES

The following are references to paragraphs from the “Justification For The Strategy For Housing To 2026” document, which was part of the Core Strategy submission in March 2011:

- [1] Paragraph 10
- [2] Paragraph 18
- [3] Paragraph 19
- [4] Paragraph 22
- [5] Paragraph 24
- [6] Paragraph 28
- [7] Paragraph 37

The following are references to relevant paragraphs from the “Appraisal of the economic growth forecast basis section for the SGC Core Strategy housing requirement to 2026” section of the above document:

- [8] Paragraph 3.1.
- [9] Relevant selected paragraphs from paragraph 4 onwards.

The following are references to other documents:

- [10] Core Strategy Including Post Submission Changes – December 2011 – paragraph 10.7a
- [11] RSS Sustainability Document 2008