

Matter 2  
Justification – The Evidence Base  
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Save Filton Airfield



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

# **Matter 2**

**Justification – The Evidence Base**

Paul D. Lee, Robert Hindle, 23 May 2012, v1.1

## Question 1

*Is the evidence base sufficiently comprehensive to support the strategy which the Council has put forward and, if not, what critical information is missing?*

SFA does not believe the evidence base with respect to Filton Airfield is comprehensive.

### **No Proof of Unviability**

SFA believes BAE's claim the airfield is unviable has not been proven or even challenged.

The profit and loss accounts presented indicate the company has operated at a loss for nine years running 2001 to 2009. In 2010 the company declared a surplus. This surplus was primarily due to increased turnover in that year. Due to commercial confidentiality it has not been possible to ascertain the reason for this increased turnover, whether it was as a result of airfield operations or non-operational activities, and its potential sustainability into future years.

(SGC Review of the BAE Systems Aviation Options Report for Filton Airfield, Paragraph 51).

SFA believes the company accounts do not seem to bear any relation to the usage of the airfield. Simply put, if we are to believe the BAE accounts, this appears to be an airfield that makes more profit the less aircraft that use it.

In 2009 the Brabazon Hangar was occupied by both Air Livery and MK Airlines. This should have generated income from both hangar rent and landing fees. By 2010, Air Livery had left, MK Airlines had gone bust and the airfield closed on weekends. Suddenly, though there was a swing from a £0.7 million loss in 2009, to a £1.3 million profit in 2010.

York Aviation took a slightly different view of the accounts.

I have received the BAE accounts from <name removed>, and we have had a quick look at these, although it seems there isn't a breakdown in the accounts of where the income comes from, which makes assessment of airfield viability in terms of aeronautical revenues (as distinct from revenues from the overall site) difficult.

(Email from York Aviation to SGC, 18 November 2011).

SFA believes the accounts for BAE (Aviation Services) Ltd. are not meaningful. They appear to bear little relationship to the operations at the airfield.

The current or prospective viability of the airfield is difficult to establish with any certainty without further information and analysis. However, in the absence of a clear overriding need for the runway to remain open, which we have not been able to identify, the question of the airfield's viability is a commercial judgement for BAE.

(Email from York Aviation to SGC, 23 November 2011).

SFA believes that BAE's view of viability will naturally be driven by BAE's own business requirements. It is perfectly reasonable for BAE to take this stance, however:

**Viable for BAE is not the same as viable for the region as a whole.**

We believe the Council should have evaluated the airfield's viability in the context of alternative visions for the airfield. Instead, the Council appears to have been pre-disposed to helping BAE with their redevelopment plans, and appears to have forgotten community views and due process. SFA notes that the Council re-worded the York Aviation conclusions with respect to viability. It is the Council's wording that appears in the final version of the York Aviation report –which the Council then presented as “independent”.

The current or prospective viability of the airfield is more difficult to establish without further information and analysis which we accept is in part due to the need of BAE to protect client confidentiality. Whilst we consider that further layers of details could be provided and analysed, we believe that, from our analysis within the tables, this wouldn't fundamentally alter the overall conclusions.

(Email from SGC to York Aviation, 24 November 2011).

**No Economic Assessment**

There is no evidence of the economic impact of the closure of the airfield, or the economic benefits of alternative proposals. It appears as though the Council did not wish this to be considered when they engaged York Aviation.

It is outside the brief for this report to undertake an economic impact assessment of the aviation activity at Filton...

(York Aviation report, page 21)

SFA believes that airports are vital assets which promote growth. The following document makes for interesting reading in this respect:

<http://www.gloucestershireairport.co.uk/Economic Value of Gloucestershire Airport-Feb 2012.pdf>

Given the findings of the above document, SFA would like to ask how can a major decision be taken on an airfield without any economic assessment?

## No Consideration of Alternatives

SFA believes that no alternative vision for the airfield has been considered. This leaves a considerable hole in the evidence base.

The ability to demonstrate that the plan is the most appropriate when considered against reasonable alternatives delivers confidence in the strategy. It requires the local planning authority to seek out and evaluate reasonable alternatives promoted by themselves and others to ensure that they bring forward those alternatives which they consider the LPA should evaluate as part of the plan-making process. There is no point in inventing alternatives if they are not realistic. Being able to demonstrate that the plan is the most appropriate having gone through an objective process of assessing alternatives will pay dividends in terms of an easier passage for the plan through the examination process. It will assist in the process of evaluating the claims of those who wish to oppose the strategy.

(PPS12, Section 4, Paragraph 38).

SFA has presented an alternative vision. We offered to meet the Council, but they chose to ignore our offer. We have seen no evidence to suggest that this or any other vision has been explored.

With respect to modifications to the CS, SFA believes the Council should properly explore the locally beneficial opportunities that exist by retaining the airfield. We believe the Council should properly engage with Save Filton Airfield, the community, Bristol City Council, Aeros, the Concorde groups and all other interested parties with a view to exploring the future with an operational airfield. There are several airfields around the UK that, with positive management, are thriving. Most of these airfields do not have the benefits of Filton – such as an aerospace cluster, demand for business aviation, emergency services use, excellent transport links, proximity to a large population and an enormous cache of historical assets. SFA does not understand why, with such a clearly valuable economic asset, the various parties have not come together with a view to creating a unique catalyst for our region. This would not only be in line with current planning policies, it would provide huge, sustainable benefits for the community.

The evidence shows that BAE, TOR, York Aviation and the Council have all neglected to consider an integrated visitor attraction in their assessments. This is despite the airfield being one of the most historic in the world, despite having not only the last Concorde to be built and fly, but the very hangar where it was built.

By way of comparison, the SS Great Britain visitor attraction welcomed nearly 200,000 visitors in 2011. This generated an income of £1.6 million. A further £3 million was collected through fundraising, legacies and grants.

## Conflict of Interests

SFA believe that in writing their report, York Aviation had a conflict interests. This considerably weakens its authority. The Council did try to avoid this, and defined exactly what a conflict of interests might be.

I would be grateful for confirmation by 7<sup>th</sup> November that:

...

You would have no conflict of interest in meeting this brief e.g. by current or recent work with any of the principal interests at Filton.

...

(Email from SGC to York Aviation, 1 November 2011)

We have no conflict of interest in this case....

(Email from York Aviation to SGC, 3 November 2011)

SFA argues that, using the Council's definition of "current or recent work with any of the principal interests at Filton", York Aviation **did** have a conflict of interest.

One of York Aviation's existing clients was TOR led by Ann Bartaby. York Aviation carried out work for TOR in connection with Redhill Airport, a case which did not conclude until **after** SGC instructed York Aviation.

BAE's main agents for Filton are also TOR, again led by Ann Bartaby.

York Aviation also carried out work for Farnborough Airport, at which time Ann Bartaby was a director. Ann Bartaby also worked in planning for both Northavon and Kingswood District Council's – which became South Gloucestershire Council.

**Essentially, SGC instructed York Aviation to appraise the work of one of their existing clients.**

## Evidence Affected by Predetermination

SFA believes there is considerable evidence to show the Council decided in favour of BAE's plans before consultation was complete. The Council appears to have directed considerable public resources into helping BAE with their plans, including significant input into both the BAE Aviation Options report, and the York Aviation report. It also includes defending BAE's plans against opposition and alternative visions, which the Council appears to have ignored.

SFA believes that this predetermination has resulted in the evidence base being incomplete, and biased towards realising BAE's plans for Filton.

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

(Letter from Terence O'Rourke, agents for BAE, to the Planning Inspector, 28 July 2011).

We believe that the Council should have remained neutral, and evaluated all the options, in accordance with planning law, policies and guidance.

## Evidence Affected by Lack of Knowledge / Research

SFA notes that the York Aviation report was completed very quickly – the first draft of their report was delivered after just four days. The Council also had short time scales. We believe this has resulted in a lack of proper research and analysis.

... the choice of aircraft base, particularly for private and corporate aircraft, is also often dictated by proximity to an origin/source, quite often the home location of the main passenger, and it seems likely that those aircraft based at Gloucestershire and Cotswold Airports are in these locations for this very reason. Otherwise it may be reasonable to assume that the operators would already have these aircraft based at Filton.

(York Aviation report, page 28).

SFA believes that if York Aviation would have conducted any level of research they would have found that some aircraft **were** based at Filton. It appears as though they were forced out when BAE closed the airfield over weekends.

The Aviation Options Report does not give specific estimates for future works but notes at paragraph 5.23 that "over the last decade BAE Systems has continued to invest in the airfield despite it remaining operationally unviable. The refurbishment programme to improve the airport facilities and ground equipment alone represents an investment of approximately £7million. The airfield has not been left to run down".

(SGC Review of the BAE Systems Aviation Options Report for Filton Airfield, Paragraph 46).

SFA believes a large proportion of this £7 million "investment" was in fact paid from central government, and the refurbishment programme was aborted. Compare this to the £32 million investment which has just been announced at Cambridge Airport.

## Further Details

Further examples and details can be found in our EIP representation documents, the very latest copies of which can be found at the following locations:

[http://www.savefiltonairfield.org/eipdocs/SFA\\_EIP\\_LEGALITY.pdf](http://www.savefiltonairfield.org/eipdocs/SFA_EIP_LEGALITY.pdf)

[http://www.savefiltonairfield.org/eipdocs/SFA\\_EIP\\_FOI.pdf](http://www.savefiltonairfield.org/eipdocs/SFA_EIP_FOI.pdf)

[http://www.savefiltonairfield.org/eipdocs/SFA\\_EIP\\_VISION.pdf](http://www.savefiltonairfield.org/eipdocs/SFA_EIP_VISION.pdf)

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