

Matter 7
Spatial Strategy (Chpt 4), Location of Development
Personal ID No. 6191745
Representation No. 6191745
Save Filton Airfield



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

Matter 7

Spatial Strategy (Chpt 4), Location of Development

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

Question 1

Is the overall strategy consistent with sustainable development principles as contained in the Planning Framework?

SFA does not believe the overall strategy is consistent with sustainable development principles as contained in the Planning Framework with respect to Filton Airfield.

PPS1, Delivering Sustainable Development, is pertinent in this regard.

Planning shapes the places where people live and work and the country we live in. Good planning ensures that we get the right development, in the right place and at the right time. It makes a positive difference to people's lives and helps to deliver homes, jobs, and better opportunities for all, whilst protecting and enhancing the natural and historic environment, and conserving the countryside and open spaces that are vital resources for everyone. But poor planning can result in a legacy for current and future generations of run-down town centres, unsafe and dilapidated housing, crime and disorder, and the loss of our finest countryside to development.

(PPS1, paragraph 1)

Key Principles:

...

(vi) Community involvement is an essential element in delivering sustainable development and creating sustainable and safe communities. In developing the vision for their areas, planning authorities should ensure that communities are able to contribute to ideas about how that vision can be achieved, have the opportunity to participate in the process of drawing up the vision, strategy and specific plan policies, and to be involved in development proposals.

(PPS1, paragraph 13)

Planning shapes the places where people work and live. The planning system operates in the public interest to ensure the development and use of land results in better places for people to live, the delivery of development where communities need it, as well as the protection and enhancement of the natural and historic environment and the countryside. The outcomes from planning affect everyone, and everyone must therefore have the opportunity to play a role in delivering effective and inclusive planning. Community involvement is vitally important to planning and the achievement of sustainable development.

(PPS1, paragraph 40)

One of the principles of sustainable development is to involve the community in developing the vision for its area. Communities should be asked to offer ideas about what that vision should be, and how it can be achieved. Where there are external constraints that may impact on the vision and future development of the area (for example, those that may arise from planning policies set at the regional or national level) these should be made clear from the outset. Local communities should be given the opportunity to participate fully in the process for drawing up specific plans or policies and to be consulted on proposals for development. Local authorities, through their community strategies and local development documents, and town and parish councils, through parish plans, should play a key role in developing full and active community involvement in their areas.

(PPS1, paragraph 41)

Community involvement in planning should not be a reactive, tick-box, process. It should enable the local community to say what sort of place they want to live in at a stage when this can make a difference. Effective community involvement requires an approach which

- tells communities about emerging policies and proposals in good time;
- enables communities to put forward ideas and suggestions and participate in developing proposals and options. It is not sufficient to invite them to simply comment once these have been worked-up;
- consults on formal proposals;
- ensures that consultation takes place in locations that are widely accessible;
- provides and seeks feedback.

(PPS1, paragraph 43)

SFA believes there is considerable evidence to show the Council decided in favour of BAE's plans before consultation took place.

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).

The evidence shows the Council appears to have dedicated its resources to working exclusively on the BAE plans. As a result, consultation was nothing more than a tick box exercise, community opinions were ignored and alternative visions were not explored, let alone developed. The Planning Framework principles appear to have been neglected.

Question 2

Are there other spatial options which would be more likely to deliver better outcomes for South Gloucestershire during the plan period?

SFA believes that retaining an operational airfield would bring a better outcome for South Gloucestershire. We have produced an alternative vision for the airfield.

Such a vision would appear to be in line with community opinion. It would avoid the traffic congestion caused by houses, and protect the existing wildlife on the site. An operational runway would encourage the aerospace cluster, and attract new aviation companies to the site, protecting highly skilled jobs and creating new ones. The airfield should be Bristol's General Aviation home, including business aviation, thus allowing maximum airline capacity to be extracted from Bristol Airport. Why not turn Filton into an Aviation Enterprise Zone in a manner similar to that at St. Athan? What about synergy with the National Composites Centre, such as developing repairs to composite aircraft?

In addition, Filton has the potential for a top visitor attraction.

Nowhere has the Council or BAE evaluated the potential of a visitor centre integrated with the airfield. In 2011, the SS Great Britain attracted nearly 200,000 visitors, creating £1.6 million of income, with a further £3 million coming to the site from fundraising, legacies and grants.

SFA believes that combining all of these uses would make the airfield viable, and would bring huge benefits to the region's economy.

Question 4

Is the spatial strategy deliverable in the plan period and have the risks to delivery been properly assessed.

SFA does not believe the spatial strategy is deliverable. The number of houses (more than 26,000), requires a rate of house sales that is not realistically possible – double the average rate that has been achieved over the last ten years. SFA doubts that even the original, lower target (21,000), will be achieved.

Question 5

Is there sufficient flexibility in the CS to allow for change or unforeseen events?

SFA would like to ask what would happen should BAE change their mind on the use of the land or get bought out? What would happen if legal issues are discovered, for example with the Defence Acts 1842 – 1935 by which the land was acquired in the first place?

Question 6

Have the cross boundary implications of the strategy been taken into account?

SFA has seen little evidence to suggest the cross boundary implications of the strategy have been taken into account, particularly with respect to Filton Airfield. The airfield lies right on the boundary between SGC and BCC. SFA believes that PPS12, Local Spatial Planning, is relevant to this question.

Many issues critical to spatial planning do not respect local planning authority boundaries. Housing markets and commuting catchments often cover larger areas, which makes planning an individual district in isolation a difficult task, even where the Regional Spatial Strategy gives a strong steer. Critical discussions on infrastructure capacity and planning may be more effectively and efficiently carried out over a larger area than a single local planning authority area. Joint working between local planning authorities can address these issues properly, and also make the best use of scarce skills and capacity in different authorities. The production of one core strategy instead of two or more may save resources. Joint working also resonates with approaches to sub-regional working as set out in the Sub-national review and supports the development and implementation of Multi Area Agreements.

(PPS12, section 4, paragraph 17).

I would also want to be confident that the approach to the use of the Airfield is one with which accords with the City Council's strategic objectives for Bristol.

(Letter from Planning Inspector, 15 August 2011).

SFA has seen no evidence to suggest the Planning Inspector's wish has been fulfilled.

SFA has carried out a Freedom of Information request with Bristol City Council to see what co-operation took place with respect to Filton Airfield. This reveals there appears to have been hardly any.

SFA is staggered by this. Some parts of the aerospace cluster, including the Brabazon Hangar actually reside within the Bristol City Council area, as do many residents who will be affected. SGC Councillors representing areas miles away appear to have more of a say than Councillors representing areas which are adjacent. This cannot be right.

Further Details

Further details can be found in our representation documents “Legality”, “FOI Evidence” and “Vision”. The very latest copies can be found at the following locations:

http://www.savefiltonairfield.org/eipdocs/SFA_EIP_VISION.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_SOUND_1.pdf

http://www.savefiltonairfield.org/eipdocs/SFA_EIP_SOUND_2.pdf