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Dear Sir or Madam

**THE PLYMOUTH PLAN 2011-2031
PART TWO - SEPTEMBER 2015
NORTH TOOLKIT**

I am instructed by Plymouth City Airport Limited (PCA Limited) to submit representations to the North Toolkit September 2015. PCA Limited has legal interests in the Former Plymouth Airport Site (FAS).

The Plymouth Plan

Consultation on the North Toolkit (simultaneously with a suite of Toolkits relating to other areas across the city) is the first stage in the formulation of Part Two of the Plymouth Plan which, collectively with Part One will form the single Plymouth Plan once adopted. Adoption is currently targeted for August 2017 in accordance with a national deadline set by central Government.

The toolkits form part of the Council's evidence base gathering in accordance with guidance set within the National Planning Policy Framework (NPPF) which stipulates:

"Early and meaningful engagement and collaboration with neighbourhoods, local organisations and businesses is essential. A wide section of the community should be proactively engaged, so that Local Plans, as far as possible, reflect a collective vision and a set of agreed priorities for the sustainable development of the area, including those contained in any neighbourhood plans that have been made." (Paragraph 155)

Notwithstanding this Toolkit consultation, it is felt that the current process is fundamentally flawed for the reasons explained in this letter. In order to ensure that the Plymouth Plan can subsequently be found sound it is essential that these deficiencies are addressed as the Plan progresses through its formulation.

The Former Plymouth Airport Site

The total landholding associated with the Former Plymouth Airport Site (FAS) is approximately 45.7 hectares (113 acres).

Airport Operations

In September 2011 all commercial flights ceased from the Site. In accordance with the terms of its Lease with the City Council, PCA Limited submitted a Non-Viability Notice to the Council to demonstrate that the Airport was no longer a viable commercial operation.

Informed by its own independent assessment the City Council ratified the Non-Viability Notice at its Cabinet Meeting on 23 August 2011, confirming that there were no legal grounds to challenge the non-viability. Having ratified non-viability, the Airport was subsequently closed on 23 December 2011.

The Site is previously developed (brownfield land) and is now vacant. PCA Limited has subsequently been in repeated discussions with officers at PCC over its reuse since its closure and has accordingly submitted representations at every opportunity in the Plymouth Plan process and prior to that the Derriford and Seaton Area Action Plan (AAP). PCA Limited has also identified the Site as being suitable, available and deliverable for residential development through the Council's Call for Sites which informed its Strategic Housing Land Availability Assessment (SHLAA) 2014.

It has also been accepted by the Independent Planning Inspectors and the Secretary of State (on the North West Quadrant Inquiry) that commercially viable aviation operations are not possible from the FAS in relation to the Call In planning appeal at the North West Quadrant and more recently the Derriford and Seaton Area Action Plan (AAP).

Notwithstanding this, PCA Limited commissioned a further Independent Review of the FAS to inform its representations to the Plymouth Plan Part One consultation response in March 2015. This was prepared by Fjori and a further copy of this can be found as Appendix 1 of this submission. This was shared in full with both officers at PCC and its advisor Arups. A number of meetings also took place to discuss the content and findings of this analysis. Following the final meeting on 20th May 2014, a further written submission was lodged by letter from Montagu Evans dated 4 August 2014. Officers confirmed that no further information or clarification was required post receipt of this.

Given the time that has passed since this Fjori Report was prepared, an updated study has been commissioned by PCA Limited. This joint report was prepared by Fjori, Steer Davies Gleave and Bickerdike Allen. In addition to providing an update to the March 2015 Fjori Report, this report specifically considers the merits of the proposed safeguarding of the site in terms of realistic prospects of securing any future aviation use. This is considered further below.

Site Location

The site is located approximately 6km north of Plymouth City Centre within the built up area of Derriford. Derriford is promoted within the adopted Core Strategy (2007) as a key regeneration area accommodating the City's future growth.

The area includes important employment sites within the Devon and Cornwall region and facilities/amenities such as Derriford and Nuffield Hospitals, Plymouth International Medical & Technology Centre, the University of St Mark and St John (MARJON), and Plymouth Science Park.

The FAS is bounded to the north and east by the B3432 and to the west by the Tavistock Road (A386). To the north of the site is the George Junction Park and Ride, a major transport interchange serving the surrounding area. To the south lies the University of St Mark and St John (MARJON) campus. The FAS adjoins the surrounding residential areas of Southway, Derriford, Glenholt and Estover but is disconnected from them because of the former airport use and associated security fencing. Redevelopment provides the opportunity to facilitate connectivity with – and between - the surrounding residential neighbourhoods, employment areas and University.

Of particular note is the recently completed residential development constructed on the former southern runway of FAS immediately to the south west of the site. The Council granted planning consent for 312 dwellings, offices and a care home (08/01968/OUT). This was a Hybrid application comprising two parts – the residential element and the decommissioning of runway and runway approach 06/24, and, construction of new aircraft hangars and associated works. Reserved Matters have been approved and the residential development almost fully built out.

The site is located in Flood Zone 1. This is land assessed as having a less than 1 in 1,000 annual probability of river or sea flooding (<0.1%), which means the site has the lowest risk of flooding.

The subject site is not located within Green Belt, Conservation Area, World Heritage Site, National Park, Site of Special Scientific Interest (SSSI) or an Area of Outstanding Natural Beauty. There are no listed buildings or scheduled monuments listed on the appraisal site.

In summary, therefore, the site is well located, within the existing urban area, within a sustainable location, adjacent to neighbouring residential areas and close to major strategic employers, health/educational institutions and a major transport interchange.

Failure of the North Toolkit to properly consider the future of the FAS

Given the aforementioned history to the site and the fact of its closure in December 2011, it is staggering that without any justification, the Council continues to ignore the potential of the FAS, instead proposing to “safeguard” it for “future aviation use” in the face of all available expert evidence, which has consistently concluded that no such use is likely to materialise.

At the very least, one would expect views on the future of the FAS to be invited through this important evidence base gathering process. On the contrary, the Council has simply chosen arbitrarily not to give any proper consideration to the future of the FAS. This has been a longstanding error of the Council throughout the Plymouth Plan-making process that is well evidenced by the North Toolkit's reliance on earlier evidence base documents.

The sites upon which specific views are being invited are listed on Page 7 of the North Toolkit. These are confirmed on Page 8 as being those previously identified through a number of sources including:

- The SHLAA (2014)
- Employment Land Review (2015)
- Sites put forward by landowners/developers
- Sites with planning consent for housing/economic uses (as of April 2015)

This is a wholly misleading statement as the FAS has been consistently promoted since its closure for redevelopment. Despite this the flawed logic seemingly adopted by the SHLAA is that the Council cannot confirm the availability of the FAS as it has not been assessed. This position is not sufficient to justify the exclusion of the FAS from the SHLAA and it is considered to be fundamentally flawed given the wider evidence set out within this representation. Contrary to the Council's position, the FAS is available, suitable and deliverable; a view that quite clearly would be reached within the SHLAA had it been allowed to do so. This is a fatal flaw in both the Council's evidence base and consequently the Plymouth Plan Part One. If it is not addressed, the Plan can only be found unsound.

At the very least the FAS should have been identified as a potential site with views then expressly sought on what the most appropriate use should be. This is no different to a number of other sites, some of which have existing uses, yet the Council sees fit to ask for views on their long term use, for example the South West Water Site; Glacis Park (Site N36); the Former Seaton Barracks Parade Ground (Site N15); and, Plymouth International Medical Technology Park (Site N20).

It will no doubt be contested by the Council that the identification of sites does not preclude views on other sites on the grounds that the question is posed on Page 8 of the North Toolkit "Are there any sites we have missed that you think we should be assessing which are not shown on the maps?"

The reality is, however, that it is made clear in the North Toolkit document that the airport is to be "safeguarded" for "aviation use". This unjustified statement clearly discourages the promotion of the FAS. Quite clearly, such views would be more forthcoming had the Toolkit invited consultees to express views on the future of the FAS, rather than presenting a *fait accompli*.

The FAS represents one of the largest brownfield sites within the Plymouth City Council area. Brownfield sites have long been identified as the starting point for new development. Over the last few decades the redevelopment of previously developed land has been the priority for central Government planning policy guidance regardless of the political complexion of the Government.

The NPPF maintains this overarching thrust of brownfield first policy and only recently the Chancellor of the Exchequer announced measures to further promote the development of suitable brownfield sites as part of his 'Fixing the Foundations' package that was labelled as a "fresh assault on Britain's planning laws". To ignore consideration of the role that redevelopment of the FAS can play in this context is to ignore a key principle of our well established Planning system: "brownfield first".

Yet despite this abject failing the Council is seemingly willing to ignore all this guidance and continue to promote the release of greenfield sites including, by way of example, extensions to the city at Woolwell within South Hams. Only recently Cllr Tudor Evans, Leader of PCC was reported in the local media as promoting the 2,000 home plan for Woolwell whilst at the same time noting that plans to build on the FAS, which could accommodate a similar number of homes, were not on the agenda. This is a further example of the future of the FAS having been prejudged without proper consideration through the Plan led system as Independent Inspectors have consistently said was necessary.

The failure of the Plymouth Plan properly to consider the opportunity afforded by brownfield sites ahead of greenfield sites, at odds with longstanding central Government guidance, is a critical flaw of the Plymouth Plan and must be addressed before publication of any future iteration of the Plan.

Proposed Safeguarding

Safeguarding of land for future development no longer has any support within the NPPF. Safeguarding is only referred to in the NPPF in order to protect land for very clear and well established land use planning reasons e.g. to maintain flood management or for essential mineral extraction. Any safeguarding of land, therefore, requires very careful consideration particularly when having regard to the NPPF's clear presumption in favour of sustainable development.

As noted, it has long been accepted by all independent assessments that there is no realistic prospect of a commercial air service operating profitably from the FAS without significant subsidy (even if this were lawful in terms of competition law).

Most recently the draft Plymouth Plan Part One acknowledged that the FAS has no future as a commercial airport. However, Policy 4 confirms that a priority for the Council is:

"Safeguarding the opportunity for the potential future re-use of Plymouth airport as a general aviation airport, whilst at the same time strengthening links to Exeter and Bristol airports."

Policy 44 also confirms that the reopening of the airport (subject to feasibility study – the Council's emphasis) is a strategic objective for the Plymouth Plan.

Despite the numerous reports into the long term future of the airport and the consistent and overwhelming conclusions, the persistence of PCC in ignoring this through the Plymouth Plan has left PCA Limited with no other option than to commission yet a further report considering the proposed safeguarding of the site for aviation use.

This report prepared jointly by Fjori, Steer Davies Gleave and Bickerdike Allen Partners can be found at Appendix 2 to these reps. In summary, this report concludes that the proposed safeguarding is flawed insofar as there is no beneficial aviation scenario that has been demonstrated as being either commercially viable, without subsidy, or of a strategic value to the city or population of Plymouth. Informing this conclusion the key findings of the report are:

1. Given the availability of other airports in close proximity to the FAS from which the Plymouth population can gain access to air services, the sole reason for safeguarding is short sighted. The Plymouth Plan fails to undertake any proper consideration of strategy for all modes of transport and alternatives for this. Consequently, the physical constraints of the FAS and the distinct unlikelihood of air service provision from the FAS with affordable ticket pricing have not been properly considered. Had this been done it would become quickly evident that safeguarding is unjustified for the stated purposes.
2. Operating as a general aviation airport, the financial analysis indicates that annual losses would be circa £1 million reinforcing that there is no prospect of financial viability even in the long term.
3. Even if commercial air services were ever to be re-started from the FAS, it is extremely unlikely that these could ever sustain a profitable airport operation. This is based on Plymouth's historical performance and trends in regional airports more generally across the UK.
4. Analysis shows that re-opening an airport at the FAS (always one of the most constrained airfields in the UK) would expose many thousands of people in the surrounding area to unacceptable noise levels. This is an important material consideration in the overall balance weighing up alternative uses for the FAS.

These findings are consistent with the previous Fjori Report (Appendix 1) that concluded that, adopting realistic assumptions, there are no scenarios whereby the FAS could operate profitably as a general aviation only, licensed airfield – either now or in the foreseeable future.

The evidence is clear that there is no viable and hence no realistic long term aviation use on the FAS. Perhaps more importantly, it is simply not needed given the availability of alternatives in close proximity to Plymouth. For this reason, safeguarding is wholly inappropriate and contrary to the NPPF requirement for local authorities positively to seek opportunities to meet the development needs of their area.

The draft Plan itself acknowledges that there are realistic airport alternatives for the residents of, and visitors to, Plymouth namely through Newquay, Bristol and Devon's own international airport near Exeter in addition to a number of other general aviation offers.

In the event that safeguarding was pursued, this would critically damage the City's opportunity to meet many of its strategic growth targets in the most sustainable fashion as required by the NPPF.

Furthermore, the City Council has given no consideration to the implications of the proposed safeguarding particularly in terms of impacts beyond the FAS site. In particular no consideration is given to potential needs

for land acquisition beyond the existing FAS land to enable extension of the existing airport facility. This could result in the loss of existing homes and employment space and could require Compulsory Purchase.

In the light of this evidence, the proposed safeguarding is considered wholly inappropriate and contrary to the NPPF requirement for local authorities to positively seek opportunities to meet the full development needs of their area, and would render the Plan unsound.

The safeguarding of the FAS also prevents the proper assessment of alternative options when considering how best to meet the identified development needs of Plymouth over the Plan period.

This fatal flaw must be addressed through release of the FAS in terms of any future aviation use and proper and timely consideration of alternative uses. Furthermore, the FAS affords the opportunity for delivering a wide range of possible uses including housing, community, retail, commercial, leisure and recreational space to meet local needs in addition to a variety of regional and sub-regional developments. Once released, the range of possible uses to be brought forward on the FAS can appropriately be considered through Part 2 of the Plymouth Plan. High level consideration of such redevelopment options is set out further below in the context of specific identified needs.

FAS Redevelopment Opportunity

Having demonstrated that there is no justifiable reason to safeguard the FAS, it is incumbent on the Council to consider how best to use this strategic site.

Accepting this position it is important to give consideration to the conclusions drawn by independent inspectors for both the North West Quadrant Call In Inquiry and the Derriford and Seaton AAP who have already considered the merits of the FAS in terms of its suitability for delivering the new District Centre in north Plymouth (as was being promoted at that time).

In respect of the FAS, the conclusions drawn by the Inspector at the Derriford and Seaton AAP examination were as follows:

- The geographical location of the FAS is towards the periphery of the Derriford and Seaton Area when assessed on the ground. However, this is largely down to the airport having been open when Core Strategy Vision 9 was adopted.
- When considering locations for the District Centre the fact the airport was functioning was clearly an important factor in it being discounted.
- The FAS is of a substantial size, currently available, previously developed land and with regard to the isochronal evidence, appears to be more closely related to a clear residential cohort than other options.

In conclusion, the AAP Inspector noted:

“These factors weigh in favour of its consideration as a location for the District Centre. However, with due regard to the SA and its addendum, the airport location is physically distant from the core of activities which form the focus of the evidence studies produced by the Council and is not consistent with the thrust of the CS to have, for example, a District Centre located with improvements to the A386 frontage and to resolve the broader fragmentation of large single land uses. The available evidence does not currently support a robust conclusion that the site is a better reasonable alternative for the District Centre at this time. The Council are suitably reviewing their strategic approach to the airport and its uses which is a sensible and appropriate mechanism for ensuring a comprehensive approach to its relationship with the wider Derriford and Seaton locality and the city as a whole.

The production process of the Plymouth Plan appears to be the logical planning vehicle for assessing the role of the airport site in northern Plymouth and any alternative uses which may be justified.”

Self-evidently we are now within the Plymouth Plan process. This is precisely the time at which the EiP Inspector concluded that reuse of the FAS should be considered. In the face of all the available evidence, the Council has once again chosen to “park” this consideration. For this reason alone, the Plan must be found unsound.

The evidence is overwhelmingly in favour of ratifying, once again, closure of the airport, a decision first taken by the Council in 2011. Therefore, given its acknowledged size, positive relationship with existing residential communities, and, identified development needs for this part of the city, it is essential that this issue is given proper consideration which, it is suggested, is highly likely to result in the allocation of the FAS for certain forms of redevelopment. This matter can no longer be ignored.

The FAS affords the opportunity for delivering a variety of other land uses, including housing together with other regional and sub-regional uses that will ensure other key strategic objectives of the Plan are met.

By way of demonstration of its potential, Leslie Jones Architects has been appointed to look at the likely scale and form of development that a masterplan led approach for the FAS could deliver. A copy of the conceptual layout can be found at Appendix 3.

The masterplan in its current illustrative format shows the broad design principles that will inform the more detailed work to be carried out over the coming months. Future work will create a design framework that builds attractive, mixed tenure homes and public spaces for all ages that mitigates fuel use, enables affordable connections to jobs and services and adapts to changing social needs

The heart of the site is located close to Derriford Hospital and Marjon University. This will provide most of the residents a five minute walk to local amenities such as retail, leisure, community and other uses.

Current work indicates a quantum of around 1,600 homes in varying densities along with 4,000 sqm of commercial space, a primary school, GP practice, community centres, sports pitches and gym or sports hall. We also believe that the unique gateway location of the development offers the opportunity for a regional

facility; currently proposed as a velodrome. This will draw in users from the wider South West benefitting both the site and the wider city.

The site has the potential and scale to create a vibrant, sustainable community where citizens feel that they can have a stake in the current and future uses of the site.

The masterplan has been informed by examples from around the world where redundant airfields and airports are increasingly being regenerated as models for sustainable living. These include Edmonton in Canada, Tempelhof in Berlin and Hammarby Sjostad in Sweden. These developments all share a number of similarities.

- They have a coherent but phased masterplan.
- They provide the opportunity to regenerate brownfield sites in or close to City Centres and close to existing facilities.
- They focus on sustainable transport models so that residents find it easier to use public transport or cycle rather than travel by private car.

A cohesive masterplan offers the opportunity for new connections linking currently disparate areas of the city enhancing and improving the wider environment. An important part of this linkage is the creation of a green link connecting Holt Wood and Goodwin Park. The principal spine of the masterplan oriented along the line of the main runway will provide a landscape structure for parks, recreation and sporting areas. Tree planting will be used as an organising element to break down the scale of the open greenways and as a method to define the public realm corridors.

New links can also be made between the University, Hospital and the Park and Ride facilities and there is the potential to reinforce this important site as a gateway to the city.

The site is sufficiently large to create distinct neighbourhoods defined by their massing and density.

In progressing the masterplan consideration has been given to transport and environmental constraints/opportunities.

From a transportation perspective given the surrounding landuses the site is self-evidently highly sustainable and there are very significant opportunities of integration with the existing urban area. The site also benefits from excellent connectivity to the primary road network, the park and ride, cycle routes and the forthcoming Forder Valley link road. The scale of development opportunity afforded by the FAS is such that it can also help support future investment in strategic infrastructure alongside other planned strategic sites in the north of Plymouth to deliver sufficient transport capacity.

Environmentally the FAS is a very large brownfield site that comprises a large area of tarmac together with adjoining intensively managed grassland. The site has no national, regional or local status in terms of landscape, ecology, archaeology or recreational use, with no listed buildings or conservation areas in close proximity. The site is also located within Flood Risk Zone 1.

It is inconceivable therefore that there are any transport or environmental considerations that would prejudice the provision of a fully sustainable new residential led masterplan on the FAS. To the contrary such a masterplan offers very significant opportunity for enhancement in terms of transport infrastructure, landscape, ecology and recreational potential for the benefit of both the existing and new community.

It is clear, therefore, that the FAS is an appropriate location for providing new strategic residential led development. Despite this, the draft Plan continues to ignore further consideration of this assertion on the grounds that it proposes safeguarding of the FAS which means it is not considered to have redevelopment potential. PCA Limited, therefore, objects in the strongest possible terms to the absence of any consideration or questioning of the role the FAS can play in this regard.

Regeneration and Socio-Economic Benefits

Regeneris has been instructed to undertake an assessment of the potential socio-economic benefits that could arise from redevelopment of the FAS. A copy of their report published in October 2015 can be found at Appendix 4.

This report is based on the current masterplan described above. This research based report shows how the FAS has the potential to become a centrepiece of the Plymouth Plan delivering a new garden suburb that would:

- deliver up to 10% of the city's housing needs.
- deliver 360 permanent jobs for the city and 340 construction jobs
- attract £190m of construction investment
- create permanent economic benefits of almost £60m GVA over 10 years
- generate £14m annually in household spend, supporting a further 180 jobs
- generate annual income of around £16m in business rates and council tax
- generate one-off council receipts of a further £16m from the New Homes Bonus and Community Infrastructure Levy

In addition, the site could generate a one-off capital receipt for the Council from net development proceeds which, subject to market conditions, could be well in excess of £50million.

Conclusions

It is of deep concern that, through consultation on the North Toolkit process that will form an important part of the Council's evidence base for the Plymouth Plan, the Council continues to ignore the FAS and the very significant development opportunities it affords.

Critically, and without any justification, the Council continues to disregard the potential of the FAS, instead taking a politically driven decision based upon vocal campaigning by a small lobbying group to safeguard it for

future aviation use - in the face of all available evidence. For the Plan to be found sound, this error must be addressed immediately.

As has been independently concluded on a number of occasions, the ongoing Plymouth Plan process is the time for the future of the FAS to be resolved once and for all. In the light of the NPPF's presumption in favour of sustainable development a decision over the future use of the FAS cannot be put on hold again. There are clearly identifiable strategic development needs for Plymouth that must be positively planned for by the Plymouth Plan which the FAS can play a very significant role in meeting. At every level redevelopment of the FAS complies with the policy objectives within the NPPF. Not to do so can only mean less sustainable forms of development on green field sites will be required to the detriment of all within the Plymouth Area.

PCA Limited welcomes this opportunity to comment on the emerging Plymouth Plan at this time and will remain proactively involved in the Plymouth Plan policy formation process. In the interim, if there are matters raised within this submission that officers wish to discuss please do not hesitate to contact me.

Yours sincerely



WILL EDMONDS
PARTNER
MONTAGU EVANS LLP

cc. J.Turner - Sutton Harbour Holdings plc