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13 February 2018

Mrs Burden and Mrs Wright  
c/o Mr Robert Young  
Programme Officer  
Joint Local Plan Team  
Strategic Planning and Infrastructure  
Plymouth City Council  
Ballard House  
West Hoe Road  
Plymouth  
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**Sent by email**

Dear Mrs Burden and Mrs Wright

**PLYMOUTH AND SOUTH WEST DEVON JOINT LOCAL PLAN 2014-2034  
ID NO: 1095702**

We write in response to your invitation to comment in writing on the documentation referred to by ARUP on behalf of the Joint Local Plan (JLP) authorities at the Examination session on 1 February 2018 and subsequently supplied to the Examination as T33.

Examination document T33 is a summary of General Aviation and Scheduled Air Traffic Movements at Plymouth Airport 2002-2011 sources from the Civil Aviation Authority (CAA). This document was referred to by the Council during the Airport Policy session in support of its case for safeguarding the Former Airport Site as a "general aviation airport" and in particular as evidence of alleged demand for GA usage of the former airport site, said to comprise 60-80% of movements.

In respect of this evidence, we wish to make the following observations:

- It has already been accepted by the Council that there is no viable prospect of commercial/scheduled aviation commencing at Plymouth (See Examination Doc T11). This was further reinforced by the Department of Transport Report (T17). This element of the data (the right hand column) can therefore be ignored for the purposes of this Examination.
- In fact, the table supplied shows a steady and marked decline in GA movements at Plymouth City Airport over the ten year period before closure of the airport on 23 December 2011. This decrease in movements was from 24,413 in 2002 to 9,669 in 2011. This represents a reduction of 14,744 movements which represents a decrease of almost 60%.
- A significant number of these movements were MOD/FOST related. The actual recorded FOST movements were as follows:
  - 2449 in 2007
  - 2682 in 2008
  - 2209 in 2009
  - 2804 in 2010
  - 1490 in 2011 (up to July 2011)
- Using these figures and subtracting the FOST movements from the totals in T33, the "other GA" movements were as follows:
  - 11,023 in 2007
  - 10,165 in 2008
  - 8,947 in 2009

- 8550 in 2010
  - 8179 in 2011
- As noted by us at the Examination, Plymouth City Council has granted consent at Kinterbury Point for a new helipad for use by FOST (Document EXD12F). This application was described in the Officer Report as follows:

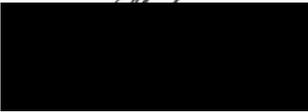
*“The primary purpose of the planning application is to provide the Ministry of Defence (MOD) with a single-spot touchdown and Lift-Off Helipad suitable for rotary aircraft for the Forwarding Operating Base (FOB) of the Flag Officer Sea Training (FOST).”*

Planning permission for this facility was pursued by the Defence Infrastructure Organisation as a suitable location for a new FOB, which currently relies on HMS Raleigh in Cornwall as a temporary FOB since closure of the landing pads at Weston Mill in April 2012 and Plymouth Airport in 2011.

- Removing the FOST movements from the recorded GA movement data further exacerbates the very significant decline in GA usage of the airport in the period leading up to its closure.
- The steep and steady decline in GA activity occurred despite what the Council suggested were very low landing charges; at around £10 on average. If, as proposed by the Council, landing charges could increase (to make the GA offer more viable) in reality this would only serve to make use of Plymouth Airport less attractive which in turn would reduce even further the likely number of movements, yet further undermining its viability. Even assuming that a re-opened GA Airfield at Plymouth could attract back circa 8,000 non-MOD GA movements, with 50% being “landings”, either at £10/landing or £20/landing, the revenue (ie £40,000 or £80,000 respectively) would make virtually no impact on the costs of operating and maintaining a licensed airfield at Plymouth (which, as explained at the Examination start at £500,000, just to provide a dedicated emergency/fire service and Air Traffic Control service and before any other maintenance or operational costs are considered).

In summary, therefore, we consider that the data tabled by the Council in T33 showing the steep decline in GA activity over the decade prior to closure provides further robust evidence that the proposed safeguarding is unsound.

Yours sincerely



**WILL EDMONDS  
PARTNER  
MONTAGU EVANS LLP**

cc. J.Schofield - Sutton Harbour Holdings plc