PLYMOUTH AND SOUTH WEST DEVON JOINT LOCAL PLAN EIP

MATTER 4
PLYMOUTH AIRPORT SITE

HEARING STATEMENT ON BEHALF OF SUTTON HARBOUR HOLDINGS PLC (PCA Limited).

JANUARY 2018
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1.0 INTRODUCTION AND CONTEXT

1.1 Sutton Harbour Holdings plc ("SHH") has held long leasehold and freehold interests in the Former Plymouth Airport Site ("FAS") since 2000. It also has broader interests in Plymouth as a City and Port. For over a decade, from 2000 to 2011, SHH sought to operate Plymouth Airport as a commercial concern. It is therefore uniquely well placed to comment on the wisdom and soundness of the proposed policies in the Joint Local Plan ("JLP").

1.2 SHH does not consider that there is robust evidence to support the policies of the JLP in relation to the FAS. SHH considers that these policies result from a disappointing failure on the part of Plymouth City Council (“PCC”) to accept the evidence already before it, with the highly regrettable consequence that the JLP as drafted will miss the opportunity to capitalise on the availability of a brownfield site of strategic size and location which is embedded within the existing urban area and which should be at the heart of its growth strategy for North Plymouth.

1.3 It may be helpful to remind the Examination of four key elements of context:

   i. Despite the best efforts of SHH, it was simply not possible to run the airport profitably, even during years of strong and sustained economic growth (in the early and mid 2000s), when demand for air services should have been at its highest.

   ii. In August 2011, PCC formally accepted that the airport could not be run viably, having had full regard to economic and financial appraisals undertaken by independent consultants. The airport was subsequently closed in December 2011.

   iii. In December 2016, the Government concluded that there is “no clear and consistent evidence that demand exists to operate commercially viable passenger services from a reopened PCA”, thus endorsing SHH and PCC’s earlier conclusions.

   iv. At no stage has any public body indicated that public subsidy would be available either to buy out SHH’s freehold and leasehold interests in FAS or to support the running of air services. In particular, PCC has never indicated that it could or would run the airport itself or subsidise its operation.

1.4 Why then has PCC found it so difficult to acknowledge the consequences of the facts set out above? We believe that the answer lies in the political sensitivity surrounding the future of the airport and sustained lobbying by a single local action group. In particular, there appears to be a misguided concern that Plymouth’s profile and status as a City would be diminished by the permanent closure and redevelopment of the FAS (as a result of which those seeking to travel to or from Plymouth by air have to rely upon the broad range of existing services available at Exeter or Bristol).

1 Including the setting up of an airline to operate services from Plymouth
Those who have been lobbying for the reopening of Plymouth Airport have been very vocal and keen to enlist any available support. Of course, there must be very few who would not be prepared, in principle, to support the idea of continued flying from Plymouth – if they do not have to take responsibility for the costs of running, staffing and maintaining the airport (and administering the CAA’s licence conditions) and are under no legal obligation ever to use the airport. Thus petitions offer very little assistance in resolving the future of the airport. Those living and working in Plymouth had ample opportunity to utilise the airport’s scheduled services to Gatwick (and elsewhere) when it was open, but simply did not choose to do so in sufficient numbers to secure its viability. They can hardly be blamed for making this choice, however, when the journey from Plymouth to Central London by train can be accomplished in 3 hours, without changing trains and without having to negotiate terminals or security or having to make a further connecting journey into the capital.

It is accepted that PCC has moved some way towards recognising that a better future awaits the FAS by limiting its safeguarding policy to 5 years, but this is nevertheless likely to result in a further 5 futile years of complete sterilisation, following hot on the heels of the past 6 years. SHH asks that the Inspectors review the evidence objectively and report to PCC in terms which allow it to move on and grasp the opportunity which the FAS presents to support the sustainable growth of North Plymouth, its major existing facilities (such as MARJON) and the city more generally. Furthermore, there are serious and adverse land use planning consequences of this approach, as highlighted both in our Regulation 19 Representations and our Matter 7 Statement, which bring the plan into direct conflict with the NPPF.

This Statement does not seek to repeat the contents of the Regulation 19 Representations which have already been made or reports which have already been submitted to PCC in the period leading up to the submission of the JLP, but refers to these and where appropriate updates the analysis. This Statement focuses upon the unsuitability of the FAS for the proposed allocation and its un-deliverability in any event. These are both matters which should lie at the heart of any proposed allocation or safeguarding.
2.0 IS THERE A SOUND CASE FOR A “GENERAL AVIATION AIRPORT” AT THE FAS?

2.1 Although it is plainly a longstanding airfield (originally established in the 1920s), with the gradual urbanisation of north Plymouth, the FAS is now a very poorly located site at which to focus notional general aviation activity. Over time, the surrounding area has become progressively more and more developed with housing, schools and health care facilities. Even in the past 3 years, since the OS base was last updated, much additional new development has been consented and built out in the area surrounding (and within) the FAS (see Appendix 1).

2.2 General aviation (“GA”) activity, which will normally include training flights, flying schools, aeroclubs and some helicopter activity, has a particular propensity to generate adverse noise impacts on surrounding communities. These impacts are often especially keenly felt, as the generators of the noise are perceived by affected residents to be self-serving and not simply the manifestation of a public transport facility: their private flying activities are enjoyed at the expense of the leisure of those on the ground who may wish, for example, to enjoy their gardens in relative peace at the weekend.

2.3 SHH has direct experience of this at the FAS, the use of which generated regular noise complaints from surrounding residents, especially focussed on the GA activity, leading to several formal complaints to the Ombudsman. At the time it closed, the airport had planning restrictions in place prohibiting flying school activity at weekends and limiting the number of flying schools operating from the airport to one. This was a direct consequence of the impacts of previous GA activity on surrounding residential communities, some of which lie in extremely close proximity to the FAS.

2.4 The Government has recently (2017) accepted more broadly that sensitivity to the impacts of aircraft noise has not been adequately captured by the metrics which have been in use in recent decades. Accordingly it has indicated that it will now be looking at contours extending further from runways to identify those people likely to be significantly affected by the impacts of aircraft noise, replacing the 57 dB LAeq 16 hour contour with the 54 dB LAeq 16 hour contour.

2.5 Bickerdike Allen Partners has reviewed the impacts of this change for the FAS, assuming (for these purposes only) that its re-opening was viable and deliverable. It has examined an updated representative level of GA activity based upon an average of actual activity at Plymouth in 2008 and 2010 and has also considered notional activity levels derived from material produced by Viable/FlyPlymouth.

2.6 The outcome of this assessment (see Appendix 2) is that a large number of dwellings around Plymouth Airport, estimated to range from 1100 to 1840 (and thus thousands of residents) would become exposed to adverse noise impacts, with between 270 and 580 dwellings exposed to a noise level that would seriously affect the quality of life for residents. Some education and healthcare facilities would also experience noise levels higher than recommended, particularly in the summer when windows are likely to be open. These impacts would arise solely from limited GA use of a re-opened airport.
2.7 Against this background, we note that PCC appears to have undertaken no independent assessment of the "real world“ need for GA activity to be reintroduced at the FAS so as to establish whether there is an objectively assessed need to which the land use planning system should respond in the public interest by safeguarding the FAS “for potential future re-use as a general aviation airport”.

2.8 After operating the airport for over a decade, SHH is unaware of such an unmet need, certainly not at a scale which could conceivably support the costs of re-opening the airport. Indeed, on the contrary, it is aware of a variety of established GA facilities at more rural locations in the surrounding area which, in its view, are better suited to GA activity than the FAS, having far fewer sensitive neighbours than the FAS with far less potential for conflict. Attached at Appendix 3 is an updated plan showing the location of some of the current GA facilities serving the area, many in remoter rural areas which would inevitably suffer if GA at the FAS were to be promoted in competition as a focus for GA activity.

2.9 As mentioned above, no assessment of GA needs or impacts has been undertaken by PCC so far as SHH is aware. This is a significant omission, especially as “private flying” is an expensive activity only open to a relatively small proportion of the population, with correspondingly restricted levels of demand.

2.10 Moreover, GA has no real role to play in the strategic connectivity of the city of Plymouth: see our Regulation 19 Representations. PCA attracted substantially less than 100 business flights in each of its last 3 years of operation. As well as the inherent lack of demand, the FAS suffers from physical restrictions which will always severely limit its attraction to business flights: its single runway is too short to take many business jets and is not aligned with the prevailing winds, so cross winds present a constant problem for lighter aircraft. These issues are not capable of being overcome.

2.11 Of course, GA excludes scheduled services; but these are amply provided for in the same county at Exeter Airport and the JLP is correct at para 3.61 to emphasise the importance of improving links to the regions other airports – “particularly Exeter, as the closest and most accessible significant airport and Bristol, as the major regional airport for the south west”.

2.12 Accordingly, there is no proper basis - on the evidence available - for seeking to safeguard the FAS for a “general aviation airport”.

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2 App 3, p.56, section 8.4 et seq
3.0 EVEN IF IT WERE DESIRABLE AND NEEDED, IS A GENERAL AVIATION AIRPORT AT THE FAS DELIVERABLE?

3.1 The NPPF requires that plans should be deliverable and stipulates that careful attention should be paid to viability and costs in plan-making. This avoids land being sterilised unnecessarily for uses which will not come forward.

3.2 So far as SHH can discern, neither PCC nor any other party has advanced a deliverable plan for the re-opening of the FAS as a general aviation airport. This is notwithstanding the passage of over 6 years since the closure of the airport in 2011, during which time there has been ample opportunity to present such as case, (if one existed).

3.3 PCC has indicated in correspondence that the proposed safeguarding relies upon the conclusions of the Plymouth Airport Report Final Study issued by ARUP in September 2014. Option 5 within that Report is entitled “Open Plymouth City Airport as a licensed airfield for General Aviation use”. This appears to be the only option which matches the policies proposed in the JLP.

3.4 The analysis of Option 5 comprises 3 pages (pp.40-42), wherein various issues which were then considered to arise in the context of Option 5 are “aired”. The issues are then colour coded and “scored”, albeit that, looked at logically, failure in respect of one issue would rule out viability entirely. For example, in respect of leasehold acquisition, it is acknowledged that these costs “would significantly increase the initial financial expenditure/exposure necessary to obtain control of the PCA site…it would require significant sums of financial expenditure” but “there is no evidence available on costs of acquiring the leasehold”. This issue is simply left hanging in the air with “red” colour coding, even though the significant sums alluded to could negate entirely the validity of Option 5.

3.5 Capital expenditure upon infrastructure is identified as £7.8-£7.9m, excluding the costs of obtaining the leasehold, although the reference in the footnote for this sum (which is bound into the Report as Appendix J, p.7) gives this cost as £5.36m. These two figures are dramatically at variance both with each other and also with those of £0.55 to £1.25m now given in a more recent report by the same authors (ARUP) entitled Site Condition Assessment & Capital Investment Update February 2017. It is difficult to know what to make of these conflicting assessments.

3.6 For their examination of the key issue of Revenue, ARUP seem to rely entirely on the earlier Berkeley Hanover Report, which used different and inconsistent assumptions to ARUP’s, such as “no capital expenditure”. However, the Revenue assessment concludes: Option 5 “could be viable if sufficient use could be attracted to PCA and this would need to be presented in a detailed business plan by any potential operator. Any plan would need to show that GA operations could bear the costs of obtaining the leasehold or [sic] undertaking the initial refurbishment and infrastructure re-commissioning works without public subsidy”. This conclusion is repeated at p.53-53.
It is thus transparently clear that ARUP did not consider that there was material before the authors which would support a conclusion that Option 5 would be viable.

3.7 Notwithstanding the passage of over 3 years since the publication of this report, no such “detailed business plan” grappling with all the difficult issues raised by ARUP has ever been presented.

3.8 It would appear from the material submitted by Viable/FlyPlymouth with their Regulation 19 representations that they acknowledge that Option 5 would not produce revenues sufficient to cover the costs of re-opening the airport. Their representations seem to suggest that the shortfall can be partly plugged by revenue from letting out the old buildings within the airport perimeter. This is supported by a letter dated 26th October 2016 from Listers Property Consultants. SHH had not seen this letter until the Regulation 19 Representations were made available by PCC.

3.9 SHH has, of course, had its own experience of seeking to increase revenues by letting surplus buildings within the FAS Estate, but it has turned to Messrs Bruton Knowles to offer a current professional view of the picture painted by Listers Property Consultants in their appraisal. Even on a conservative basis, Bruton Knowles dispute that the buildings have the potential to create a positive cashflow in any business plan (Appendix 4).

3.10 Accordingly, the position before the Examination is that the FAS was accepted not to be viable by PCC in 2012 following years of sustained losses. In the succeeding period of 5 years, no consultant acting on behalf of PCC and no third party has demonstrated that there is any prospect of operating the FAS as a self-financing and viable general aviation airport.

3.11 Yet a further factor is that the FAS is not “available” for any third party to try his or her hand at running a “general aviation airport”. It is subject to the freehold and long-leasehold interests of SHH. No party has even begun to address how the FAS would transferred to a third party when there is no credible basis either for requiring this or for funding the acquisition. Neither PCC nor FlyPlymouth has demonstrated how this would be achieved.

3.12 Thus, even when considered on a limited basis, policies SPT8 (1) and PLY42 are patently not appropriate and justified by robust evidence:

i. No need for a general aviation airport at Plymouth has been established; there are many other general aviation airfields in the surrounding area for flying schools and clubs. No military requirement has been evidenced. MoD has extensive holdings in the area from where to operate its helicopters.

ii. The impacts of general aviation activity at the FAS in the past – in particular flying schools, and helicopter activity – provoked sustained complaints from nearby residents. The latest Government-endorsed metrics for assessing
significant impacts of aircraft noise capture large numbers of Plymouth residents, as well as sensitive education and healthcare users. This is a function of the incremental development of the area around the FAS over the past 70 years.

iii. There is no credible evidence to be found in the Council’s evidence base which establishes that a “general aviation airport” at the FAS could ever be viable.
4.0 ALTERNATIVE USES FOR THE FAS

4.1 SHH has developed an alternative vision for the FAS, in the form of the Plym Vale Masterplan (Appendix 5). This would deliver a range of market and much needed affordable housing, employment, educational and leisure development across the site, at the same time opening up this effectively “sealed” area of land at the heart of North Plymouth promoting permeability and connectivity. The site is of sufficient scale to accommodate the expansion needs of the adjoining University (MARJON), as well as incorporating synergistic development components of regional significance, such as a multi-purpose sports/performing arts arena.

4.2 Previous Inspectors have recognised the development potential of the FAS and have indicated that the JLP is the vehicle by which its future should be determined. PCC’s consultants ARUP were expressly asked to consider alternative strategies and uses for the FAS as part of the assembly of evidence to support the JLP. ARUP concluded\(^3\) that both housing and employment redevelopments would bring “positive effects to Plymouth and the wider region” but stopped short of recommending their promotion on the basis that they would preclude a future resumption of air services. However, ARUP’s report pre-dated by one month the Government’s finding in December 2016 that there was no clear and consistent evidence that sufficient demand exists to operate commercially viable passenger services from a reopened PCA.

4.3 In the light of the matters discussed above, SHH considers that the Examination must consider the enormous potential of the FAS to contribute positively to sustainable growth in Plymouth, both generally and as an alternative to major greenfield releases promoted in the JLP on peripheral environmentally sensitive sites. By contrast, the JLP “safeguards” and effectively sterilises land for a use which, even if it were to come forward, would benefit only a very small and restricted group and for which no demonstrable land use planning need exists. Thus the unsoundness of the plan’s proposals is even more starkly revealed when they are considered against the reasonable alternatives.

\(^3\) Plymouth Airport Safeguarding – Consideration of Alternatives November 2016, p.33
5.0 CONCLUSIONS

5.1 The introduction of a “GA airport” at the heart of a residential area, which also supports many educational and healthcare facilities, will expose large populations to noise levels which are likely to generate significant adverse impacts on their quality of life. This will include the introduction of noise sources the character and nature of which are known to be particularly annoying to local residents (eg flying schools, training flights and helicopter movements).

5.2 There is no objectively assessed evidence that Plymouth needs a GA airport at the FAS: flying schools and aeroclubs would be better located at more remote GA facilities; business flights only ever represented a tiny proportion of activity at the FAS and there is no evidence that this would change - especially given the physical runway length and orientation constraints at FAS.

5.3 There is no basis for concluding that a GA Airport at the FAS could be a viable proposition. Its location within the urban area means that it would have to be a licensed facility with the costs which that implies. The costs of infrastructure renewal, acquisition of relevant property interests and ongoing staff and maintenance costs would simply not be met by revenues. SHH tried to operate the airport commercially for a decade without success; demand levels were simply too low to make this achievable, even during a period of strong economic growth.

5.4 At the same time, policies SPT8 and PLY42 have as their bi-product a calamitous missed opportunity to put the brownfield land at the FAS to beneficial use to deliver a strategic scale mixed use development at an outstandingly accessible and well integrated location at the heart of North Plymouth.

5.5 There is no need for yet a further period of deliberation about the future of the FAS. Other towns and cities have had to accept that former airport land will generate greater community benefit if developed. The time has come for Plymouth to reach that conclusion in respect of the FAS.
FORMER PLYMOUTH AIRPORT SITE: RESIDENTIAL CONSENTS SINCE 2014

1. Fort House, Fort Terrace, Plymouth
2. Land adjacent to Plumer Road, Plymouth
3. Land off Miller Way, Plymouth
4. Former Southway Secondary School, Land West of Skerries Road, Plymouth
5. Land to the north of Clittaford Road, Southway, Plymouth
6. 456 Tavistock Road, Plymouth, PL6 7HQ
7. Land off Towerfield Drive, Plymouth (87 units)
8. Land off Towerfield Drive, Plymouth (11 units)
9. Land at Seaton Neighbourhood, Plymouth (Phase 5)
10. Land at Seaton Neighbourhood, Plymouth (Phase 7)
11. 119 Lowendal Lane
12. Site Adjacent to 22 Dunraven Drive
13. Estover Close, Riverford
14. Land Adjacent To Commonwood Cottage, Estover Close
15. Osborn Lodge, Riverford, Estover Close
16. 305 Tavistock Road
17. Former Runway, Plymouth City Airport, Plymbridge Lane
18. Land off Dower Road
19. Land West of Cardinham Close
20. Land Adjacent to Yardley Gardens
21. 43 Powisland Drive
Plymouth Joint Local Plan
A11085-N02B-DR
08 January 2018

Summer 2012 and Viable Phase 1 Update Noise Contours for Plymouth Airport

1.0 INTRODUCTION

In preparation for the Plymouth Joint Local Plan Examination, Bickerdike Allen Partners LLP (BAP) have considered further the possible noise effects of introducing general aviation activity at Plymouth Airport, responding to the recent changes in Government guidance on the impacts of aviation noise. Two sets of noise contours have been produced, one based on a prediction of aircraft activity around the time of the closure of the airport, for summer 2012 based only on General Aviation and helicopter activity and a second based on an update of the Viable Phase 1 contours produced previously. This note sets out the results of the noise contouring and the assumptions used in producing the contours. It also considers their impacts based on emerging UK Government aviation policy alongside a recent planning decision regarding housing development near aerodromes and other recognised guidance documents. Consideration is also given to relevant Local Government Ombudsman decisions at Plymouth Airport.

2.0 ASSESSMENT CRITERIA

2.1 UK Government Policy

The Government’s policy on aviation noise is set out in the Aviation Policy Framework published in March 2013. In October 2017, the Secretary of State for Transport presented to Parliament the Consultation Response on UK Airspace Policy: A framework for balanced decisions on the design and use of airspace.

This states in paragraph 9:

The Government’s current aviation policy is set out in the Aviation Policy Framework (APF). The policies set out within this document provide an update to some of the policies on aviation noise contained within the APF, and should be viewed as the current government policy. The government also intends to develop aviation noise policy further through the Aviation Strategy consultation process. As part of the Aviation Strategy consultation on sustainable growth planned for 2018 the government intends to consider the roles, structures and powers that currently exist and what, if any, new ones will be necessary to bring about the network wide, co-ordinated and complex changes needed for airspace modernisation.

Some key changes to current government policy emerge from the above report.
Paragraph 2.70 states:

2.70 The government acknowledges the evidence from recent research\(^5\) which shows that sensitivity to aircraft noise has increased, with the same percentage of people reporting to be highly annoyed at a level of 54 dB \(L_{Aeq\,16h}\) as occurred at 57 dB \(L_{Aeq\,16\,hr}\) in the past. The research also showed that some adverse effects of annoyance can be seen to occur down to 51 dB \(L_{Aeq}\).

It goes onto state in paragraph 2.72 that the Government will set a Lowest Adverse Effect Level (LOAEL) at 51 dB \(L_{Aeq,16h}\) for daytime.

In summary therefore, whereas in the APF, 57 dB \(L_{Aeq,16h}\) noise contour was stated as the average level of daytime aircraft noise marking the approximate onset of significant community annoyance, the above indicates this now occurs at 54 dB \(L_{Aeq,16h}\).

In addition, it is now recognised that some adverse effects of annoyance occur down to 51 dB \(L_{Aeq,16h}\).

### 2.2 Planning Decisions re: Aerodromes – Lavant Inquiry revisited in the light of new Government guidance

In November 2013, a planning inquiry was held into the refusal by Chichester District Council to permit a new 91 unit residential development in Lavant. The proposed development would be situated to the north of Lavant, approximately 1.2 kilometres to the west of Goodwood Aerodrome.

The site area was situated within the 51 to 52 dB \(L_{Aeq,16\,h}\) average summer day noise contour for Goodwood Aerodrome. In recognition of research that noise from general aviation traffic gives rise to a more significant community response than from commercial aviation activity, evidence was presented to the Inspector that the site had been assessed not on the basis of 57 dB \(L_{Aeq,16\,h}\) marking the approximate onset of significant community annoyance, but 52 dB \(L_{Aeq,16\,h}\). Similar 5 dB reductions were made to other standard indicators of noise impacts. The Inspector agreed with this approach as evidenced in the paragraph 42 and 43 of his Decision Report, published in February 2014:
42. The Explanatory Note to the Noise Policy Statement for England is cited by way of explanation. This explains that a single objective noise-based measure defining a 'significant adverse impact' is unavailable and that further research is required to identify what may constitute a 'significant adverse impact on health and quality of life' from noise. For the moment the guidance (in relation to airports rather than aerodromes) set out in the Aviation Policy Framework is that $L_{A_{eq,16h}}=57$ dB (on an average summer day) is to be taken as the 'level of daytime aircraft noise marking the approximate onset of significant community annoyance'. But, it is recognised that people do not experience noise in an 'averaged' manner and that the chosen measure does not necessarily reflect all aspects of the perception of aircraft noise. It is recommended that average noise contours should not be the only measure used and that alternative measures which better reflect how aircraft noise is experienced in different localities are developed, in consultation with local communities, amongst others.

43. More detailed guidance is not readily available. PPG24 is no more. In any case, it was 'long in the tooth' some time before it was revoked and did not reflect subsequent revisions to the WHO Guidelines on which some of its provisions were based. However, surveys undertaken in the 1980s and cited in PPG24 are put forward as indicating that the level at which 11-12% of respondents become 'very much annoyed' in relation to airport activities is when $L_{A_{eq,16h}}=57$ dB, so providing some support for current Government guidance relating to airports. Those surveys also demonstrate that, at aerodromes (like Goodwood) 10% or so become 'very much annoyed' when $L_{A_{eq,16h}}=52$ dB. On that basis, I agree that the latter measure can be taken as the 'onset of significant community annoyance' here. The relevant table shows (document 5 page 62) that the incidence of such annoyance estimated by the regression model fitted to the survey results rises quite sharply reaching 15% at $L_{A_{eq,16h}}=55$ dB and 26% at $L_{A_{eq,16h}}=60$ dB.

Despite this approach, which demonstrated that general aviation traffic over an average summer day, would, remain below 52 dB $L_{A_{eq,16h}}$ over any part of the development site, the Inspector focussed on the variability of noise over the summer period, with some days being quieter than the average but also some being noisier, up to 58 dB $L_{A_{eq,16h}}$ on some days. On this basis, he stated in paragraph 46:
46. Those results demonstrate that the measured noise environment in the gardens of the proposed dwellings would be roughly where the ‘onset of significant community annoyance’ is likely to occur. But, on those days when runway 24 might accommodate a noticeable number of aircraft, noise levels would be likely to exceed the WHO Guidelines for preventing ‘moderate annoyance’ in outdoor living areas ($L_{eq,16hr}=50$ dB) and, in 41% of the occasions when runway 24 was in reasonable use (and suitable data was available) exceed or equal the threshold where ‘serious annoyance’ might occur ($L_{eq,16hr}=55$ dB). I agree that the WHO Guidelines (and for that matter BS:8233) relate to a ‘steady noise’ rather than the more intermittent sounds emanating from aircraft. But I do not agree that prevents a valid comparison. On the contrary, the noise levels are measured by the same ‘metric’. And, far from indicating that equivalent levels might be more acceptable in relation to aircraft, the WHO Guidelines state that ‘data from a number of sources show that aircraft noise is more annoying than road traffic noise, which, in turn, is more annoying than railway noise’. The implications are clear. Not only would this estate occupy land where noise would be roughly sufficient to engender the ‘onset of significant community annoyance’, but also, when runway 24 accommodated more than a few aircraft, noise levels would be sufficient to cause ‘serious annoyance’ or (interpolating from the table cited above) result in some 15-20% of residents being ‘very much annoyed’.

The Inspector concluded in paragraph 47 that:

“...The evidence adduced indicates that runway 24 accommodates a noticeable number of aircraft for a significant proportion of summer days and that, when that occurs, noise levels are often sufficient to induce ‘serious annoyance’. I consider that such an impact would be likely to seriously affect the quality of life for prospective residents. And, although that would be unlikely to curtail the activities at Goodwood (given the extant permissions, permits and operating protocols, as ID3 illustrates), it would impinge on the enjoyment and use of gardens by prospective residents, thus detracting from an important feature of any new suburban estate; no obvious mitigation is possible. In my view, the latest Government guidance tends strongly to reinforce the messages which can be drawn from the Lavant decision.

2.3 Ombudsman’s Report into Complaint against Plymouth City Council – November 2002

The lease of Plymouth Airport did not permit training flights to be carried out over weekends. This was to safeguard the amenity of the local residents. A local resident complained that the Council had failed to control the activities of the flying school that operated from Plymouth Airport at that time. The lease also prohibits activities which cause unreasonable nuisance or annoyance to the local residents. The Council’s environmental health department confirmed that the training flights can cause unreasonable nuisance. It was found by the Local Government Ombudsman that the Council failed to enforce these provisions of the lease.
The above finding supports the view that general aviation activity, particularly at weekends, when people might expect to enjoy their gardens and relax following their normal working week, can cause disturbance to the local community as a result of noise impacts.

2.4 Assessment Criteria for Various Building Types

Appendix A sets out noise assessment criteria for the following building types:-

- Residential
- Offices
- Hotels
- Schools
- Healthcare Facilities

2.5 Summary of Noise Criteria

Based on the above, it evident that current Government policy indicates:

- 54 dB $L_{A_{eq,16h}}$, based on an average summer day, marks the onset of significant community annoyance
- 51 dB $L_{A_{eq,16h}}$ represents the Lowest Observed Adverse Effect Level

The above applies for noise around commercial airports.

For aerodromes, where evidence exists to show people are more annoyed by aircraft activity than around commercial airports, it can be concluded that for periods of high activity, such as on certain days in the summer, levels should not exceed the World Health Authority criterion of 55 dB $L_{A_{eq}}$ outside a residential property or in a garden. This is different to the average summer value which, by definition, being based on an average of 92 days between mid-June and mid-September, would need to be significantly lower than this to ensure that this “daily” limit was not exceeded.

For other types of accommodation, other than residential, and based on the above, the following table sets out the general noise criteria adopted for the purposes of determining whether noise mitigation measures are likely to be required to protect buildings from surrounding environmental noise sources.
### Table 1 – Recommended Internal Noise Levels

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<th>Daytime (Internal Noise Criteria)</th>
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<tbody>
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<td>35</td>
<td>60&lt;sup&gt;II&lt;/sup&gt;</td>
</tr>
<tr>
<td>Healthcare</td>
<td>40</td>
<td>50&lt;sup&gt;II&lt;/sup&gt;</td>
</tr>
</tbody>
</table>

<sup>1</sup> Guideline value that should not normally be exceeded, based on “fast” time weighting.

<sup>2</sup> $L_{A_{50}}$ used as a proxy for 60 dB $L_{A01,30\text{mins}}$.

In general terms, assuming that in the summer, windows are either fully open or partly open, a sound reduction from outside to inside of 10 to 15 dB respectively can be assumed to apply. With closed windows, assuming standard thermal double glazing, a sound reduction from outside to inside of around 25 dB can be assumed to apply.

### 3.0 CONTOUR PRODUCTION FOR PLYMOUTH AIRPORT

#### 3.1 Summer 2012

Plymouth Airport was closed in 2011. To understand the level of noise that might arise from a continuation of aircraft activity at that time, excluding any scheduled aircraft movements and considering only fixed wing general aviation traffic and helicopter activity, the summer 2012 aircraft movements have been derived from the average of the 2008 and 2010 movements, excluding all scheduled and charter flights and training flights by Air Southwest, as they were a scheduled operator. The aircraft movements have been provided by month by Sutton Harbour and so to produce the summer period (16<sup>th</sup> June – 15<sup>th</sup> September) contours, the June and September movements were averaged and then added to the July and August movements.

As no information about the aircraft mix in 2008 and 2010 was available, the aircraft types have been based on those used for the Viable Phase 1 contours with some changes. The 2008 and 2010 aircraft movements were split into four groups Training, Others, FOST and Other Rotary. These were matched to the Viable Phase 1 aircraft groups of Non-ATM, Air Taxi, FOST and Other Helicopters respectively.

Compared to the original Viable Phase 1 aircraft mix, the FOST and Other Helicopters aircraft types have been changed to the Eurocopter Dauphin and the Westland Sea King respectively, based on advice from Sutton Harbour Holdings (SHH). The Air Taxi group previously included three aircraft with movements split equally between the three; however one of these, the Jetstream 31, requires a runway longer than Plymouth’s and so has not been included. Therefore the Air Taxi movements have been redistributed evenly between the two other aircraft types, the Piper Chieftain Navajo and the Beechcraft Super King Air 200.
3.2 **Viable Phase 1 Update**

In order to understand how, in the future, a realistic mix of general aviation activity might develop should Plymouth Airport re-open for general aviation traffic, the same changes applied to the aircraft mix for 2012 have also been applied to the Viable Phase 1 Update contours. That is the change in FOST and Other Helicopter aircraft types and removal of the Jetstream 31 from the Air Taxi group. The Viable Phase 1 aircraft movements were annual, therefore to produce the summer period contours, an annual to summer factor for each group was applied, based on the average of 2008 and 2010. These factors are given below in Table 2. Previously a 30% factor was applied for all aircraft groups.

<table>
<thead>
<tr>
<th>Aircraft Group</th>
<th>Annual to Summer Factor</th>
</tr>
</thead>
<tbody>
<tr>
<td>Non-ATM</td>
<td>29%</td>
</tr>
<tr>
<td>Air Taxi</td>
<td>28%</td>
</tr>
<tr>
<td>FOST</td>
<td>20%</td>
</tr>
<tr>
<td>Other Helicopters</td>
<td>24%</td>
</tr>
</tbody>
</table>

Table 2: Annual to Summer Factors

3.3 **General**

The movements have been modelled as occurring equally on Runway 13 and Runway 31, with 50% assigned to each. Straight routes, which follow the extended runway centreline, have been used for all of the movements. A single arrival and departure point for helicopters has been assumed, positioned at the approximate mid-point of the runway. All of the movements are assumed to take place in the daytime period (07:00-23:00).

The contours have been produced using the Integrated Noise Model (INM) software version 7.0d. Dwelling and population counts have been calculated using 2017 postcode level data supplied by CACI Ltd. BAP have identified the noise sensitive buildings within the 51 dB L_{Aeq,16h} contours from a database of buildings, based on the AddressBase Plus product provided by emapsite.

The predicted summer movements for the two scenarios are summarised in Table 3 below.
4.0 RESULTS

4.1 Noise Contours

The resulting summer 2012 and Viable Phase 1 Update noise contours are shown in the attached Figures A11085-N02-01 & 02 respectively and presented at values from 51 to 66 dB L<sub>Aeq,16h</sub>. The area of each noise contour is given in Table 4 below along with the corresponding dwelling and population counts.

<table>
<thead>
<tr>
<th>Noise Contour Level, dB L&lt;sub&gt;Aeq,16h&lt;/sub&gt;</th>
<th>Summer 2012</th>
<th>Viable Phase 1 Update</th>
</tr>
</thead>
<tbody>
<tr>
<td>51</td>
<td>1.8</td>
<td>1,100</td>
</tr>
<tr>
<td>54</td>
<td>0.9</td>
<td>410</td>
</tr>
<tr>
<td>55</td>
<td>0.8</td>
<td>270</td>
</tr>
<tr>
<td>57</td>
<td>0.5</td>
<td>170</td>
</tr>
<tr>
<td>60</td>
<td>0.3</td>
<td>70</td>
</tr>
<tr>
<td>63</td>
<td>0.2</td>
<td>10</td>
</tr>
<tr>
<td>66</td>
<td>0.1</td>
<td>0</td>
</tr>
</tbody>
</table>

<sup>[1]</sup> Dwelling and population counts have been rounded to the nearest 10

Table 4: Contour Areas, Dwelling and Population Counts
4.1.1 Residential

The table above shows for the 2012 mix that 1,100 dwellings would experience some adverse effects from aircraft noise (at or above 51 dB $L_{A_{eq,16h}}$) while at least 400 would lie above the threshold marking the approximate onset of significant community annoyance. In terms of general aviation noise, even using summer average day contours, 270 dwellings would become exposed to noise which the Inspector at the Lavant Inquiry considered (based on a single summer day’s activity) would seriously affect the quality of life for residents.

In the future, assuming reasonable growth, the updated Viable Phase 1 mix shows that 1,840 dwellings would be exposed to some adverse noise effects while at least 690 would lie above the threshold marking the approximate onset of significant community annoyance. There are 580 dwellings that lie within the 55 dB $L_{A_{eq,16h}}$ (based on an average summer day), the threshold used by the Inspector at the Lavant inquiry (based on a single summer day’s activity) at which general aviation noise would be judged to seriously affect the quality of life for residents.

4.1.2 Noise Sensitive Buildings (non-residential)

BAP have identified the noise sensitive buildings within the summer 2012 and Viable Phase 1 Update 51 dB $L_{A_{eq,16h}}$ Contours, these are summarised below in Table 5 and Table 6 respectively along with their associated noise levels. For the education buildings N70 and N75 have also been calculated, these are the average daily number of events above 70 or 75 dB $L_{A_{max}}$ respectively, based on the predicted summer activity. The locations of the buildings are shown on the attached Figure A11085-N02-03.
<table>
<thead>
<tr>
<th>Name</th>
<th>Category</th>
<th>Summer 2012</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td>Noise Level, dB $L_{Aeq,16h}$</td>
</tr>
<tr>
<td>Oakwood Primary School</td>
<td>Education</td>
<td>55</td>
</tr>
<tr>
<td>Plymouth Studio School</td>
<td>Education</td>
<td>55</td>
</tr>
<tr>
<td>Flying Starts Nursery</td>
<td>Education</td>
<td>57</td>
</tr>
<tr>
<td>Plymouth Marjon University</td>
<td>Education</td>
<td>51</td>
</tr>
<tr>
<td>Southleigh Residential Home</td>
<td>Residential Care</td>
<td>51</td>
</tr>
<tr>
<td>The Lodge, Care Home</td>
<td>Residential Care</td>
<td>51</td>
</tr>
<tr>
<td>Roborough Surgery</td>
<td>Healthcare</td>
<td>55</td>
</tr>
<tr>
<td>Southway Clinic</td>
<td>Healthcare</td>
<td>50</td>
</tr>
<tr>
<td>Plymouth Dialysis Unit</td>
<td>Healthcare</td>
<td>54</td>
</tr>
<tr>
<td>North Plymouth Community Church</td>
<td>Religious Building</td>
<td>51</td>
</tr>
</tbody>
</table>

Table 5: Summer 2012 Noise Sensitive Buildings and Associated Noise Levels
Table 6: Viable Phase 1 Update Noise Sensitive Buildings and Associated Noise Levels

4.1.3 Schools

Tables 5 and 6 show that for various schools that lie within the noise contours described in this note, discrete noise events higher than 70 dB and 75 dB $L_{A_{eq,16h}}$ will occur on numerous occasions during the day, with the potential to disrupt classes. Oakwood Primary School, Plymouth Studio School, Flying Starts Nursery and Plymouth Marjon University are likely to be the most affected. For the first three of these teaching establishments, external noise levels generated by aircraft alone under the scenario modelled either equal or exceed 55 dB $L_{A_{eq,30min}}$ recommended limit for noise levels in unoccupied playgrounds, playing fields and other outdoor areas. This takes no account of existing ambient noise levels in the absence of aircraft noise which would combine to increase the overall external noise level.

4.1.4 Health Care Facilities

Table 5 and 6 show that a number of healthcare facilities, particularly Roborough Surgery and Plymouth Dialysis Unit will experience external noise levels, for both Plymouth Airport scenarios modelled, higher than recommended for wards during the daytime when windows are partly open. This is the case based on average summer day contours determined over a 16 hour period. The noise limits are framed as hourly levels which at times will be higher than the 16 hour average. Tables 5 and 6 therefore underestimate the noise impacts on healthcare facilities.
5.0 SUMMARY

This note has considered the potential noise effects of the re-introduction of general aviation activity, including helicopter flights, at Plymouth Airport. The impacts have been described having regard to the very latest Government advice on the effects of aviation noise on the community. Account has been taken of other standard guidance documents relating to noise, including those of the World Health Organisation.

The outcome of this assessment is that a large number of dwellings around Plymouth Airport, estimated to range from 1100 to 1840, depending on the activity at the airport, would become exposed to adverse noise impacts, with between 270 and 580 exposed to a noise level that would seriously affect the quality of life for residents.

Some schools and healthcare facilities would also experience noise levels higher than recommended, particularly in the summer when windows are likely to be open.

Duncan Rogers
for Bickerdike Allen Partners LLP

Peter Henson
Partner
APPENDIX A

NOISE ASSESSMENT CRITERIA FOR
VARIOUS BUILDING TYPES
A.1 Residential

A.1.1 World Health Organisation (WHO)

Daytime Noise

The WHO “Guidelines for community noise” provides a range of aspirational noise targets aimed at protecting the health and well-being of the community. They therefore set out noise targets which represent goals for minimising the adverse effects of noise on health as opposed to setting absolute noise limits for planning purposes. For the control of noise in outdoor living areas, the relevant criteria relating to steady, continuous noise have been presented below in Table A1.

<table>
<thead>
<tr>
<th>Specific Environment</th>
<th>Critical Health Effects</th>
<th>Ambient Noise Level $L_{Aeq}$ (dB)</th>
<th>Time Base (hours)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Outdoor living area</td>
<td>Serious annoyance, daytime evening</td>
<td>55</td>
<td>16</td>
</tr>
<tr>
<td></td>
<td>Moderate annoyance, daytime evening</td>
<td>50</td>
<td>16</td>
</tr>
</tbody>
</table>

Table A1: WHO recommended Ambient Noise Levels for Outdoor Living Spaces

Although the attainment of these target values is not always achievable in practice, particularly where a dwelling is located close to a busy road, controlling the daytime noise level to 55 dB $L_{Aeq,16h}$ or below is commonly cited as a requirement in planning decisions and is therefore relevant when safeguarding land in respect of future noise from Plymouth Airport.

A.2 Offices

A.2.1 British Council for Offices 2014 Guide (BCO)

External noise intrusion levels should not be more than the following ratings when measured in terms of $L_{eq,T}$ – where $T$ is the duration of the normal working day, typically 8 hours between 09:00 and 17:00.

<table>
<thead>
<tr>
<th>Room</th>
<th>Residual external noise after attenuation by the building façade, NR $L_{Aeq,8h}$</th>
<th>Equivalent dB $L_{Aeq,T}$ dB (NR = dB(A) − 6)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Open plan office</td>
<td>NR40($L_{eq,T}$)</td>
<td>46</td>
</tr>
<tr>
<td>Speculative offices</td>
<td>NR38($L_{eq,T}$)</td>
<td>44</td>
</tr>
<tr>
<td>Cellular offices / meeting rooms</td>
<td>NR35($L_{eq,T}$)</td>
<td>41</td>
</tr>
</tbody>
</table>

Table A2: Indoor ambient noise levels in spaces when they are unoccupied
In addition, $L_{\text{Amax(fast)}}$ noise intrusion levels should not normally be more than 55 dB in open plan / speculative offices and 50 dB in cellular offices.

In the case of naturally ventilated buildings, it may be appropriate to accept higher external noise intrusion levels than shown above in maximum ventilation mode, provided occupants have the choice to open or close windows or ventilation openings. For example +5 dB relaxation of $L_{\text{eq,T}}$ levels and/or +5 to 10 dB relaxation of $L_{\text{Amax(fast)}}$ levels depending on frequency of occurrence and character of noise.

For cellular offices, assuming 10 to 15 dB reduction through an open window, this indicates a limiting external noise level of around 70 dB $L_{\text{Amax(fast)}}$.

A.3 Hotels

A.3.1 BS8233: 2014 “Guidance on sound insulation and noise reduction for buildings”

**Design criteria for intrusive external noise**

The recommendations for ambient noise in hotel bedrooms are similar to those for living accommodation which are given below:

<table>
<thead>
<tr>
<th>Activity</th>
<th>Location</th>
<th>07:00 to 23:00</th>
<th>23:00 to 07:00</th>
</tr>
</thead>
<tbody>
<tr>
<td>Resting</td>
<td>Living room</td>
<td>35 dB $L_{\text{Aeq,16hour}}$</td>
<td>-</td>
</tr>
<tr>
<td>Dining</td>
<td>Dining room/area</td>
<td>40 dB $L_{\text{Aeq,16hour}}$</td>
<td>-</td>
</tr>
<tr>
<td>Sleeping (daytime)</td>
<td>Bedroom</td>
<td>35 dB $L_{\text{Aeq,16hour}}$</td>
<td>30 dB $L_{\text{Aeq,8hour}}$</td>
</tr>
</tbody>
</table>

**Table A3: Indoor ambient noise levels for dwellings**

NOTE In addition to hotels, rooms for residential purposes include, among others, student halls of residence, school boarding houses, hostels, hospices and residential care homes. Approved Document E to the Building Regulations [1] might not be applicable to all such premises as they are to dwellings. Occupants of rooms for residential purposes, although transitory rather than permanent, might typically reside for longer periods than hotel guests.

A.4 Schools

A.4.1 Building Bulletin 93 (BB93) – Acoustic Design of Schools: Performance Standards

The latest version of BB93 was published in February 2015 which sets out minimum performance standards for the acoustics of school buildings, and describes means of demonstrating compliance with Building Regulations and provides guidance in support of the School Premises Regulations (2012) and the Independent School Standards (2013).
Compliance with Building Regulations relates to the design and construction of new schools or schools brought about by a material change of use. Compliance with the School Premises Regulations and Independent School Standards relates to both existing, refurbished and new schools.

BB93 sets out performance standards for indoor ambient noise levels within different types of room in terms of the $L_{A_{eq,30min}}$ index as set out below. This differs from the $L_{A_{eq,16h}}$ unit commonly used for daytime noise planning.

Upper limit for indoor ambient noise level, $L_{A_{eq,30min}}$ (new school):

- Classroom and general teaching area: 35 dB
- Teaching space (special communication needs): 30 dB

BB93 states that the above internal noise criteria can usually be achieved in a naturally ventilated school, provided the criteria are not exceeded by more than 16 dB for single sided ventilated spaces and 20 dB for cross ventilated or roof ventilated spaces. This suggests to achieve the internal ambient noise level inside a classroom using natural ventilation, external noise levels should not exceed 55 dB $L_{A_{eq,30min}}$. This is consistent with guidance in the previous 2003 version of BB93 which states:

“Noise levels in unoccupied playgrounds, playing fields and other outdoor areas should not exceed 55 dB $L_{A_{eq,30min}}$ ...”

BB93 also states that in order to protect students from regular discrete noise events, e.g. aircraft or trains, indoor ambient noise levels should not exceed 60 dB $L_{A_{01,30min}}$. The $L_{A_{01}}$ index which is the level exceeded for 1% of the time, is close to (but slightly lower than) the $L_{A_{S_{max}}}$ index and, to a first approximation, the $L_{A_{S_{max}}}$ can be used as a proxy for design purposes in this regard.

On this basis, assuming that in the summer, windows might be open with a consequential reduction in sound insulation from outside to inside of 10 dB to 15 dB, this discrete noise event limit for outside the school equates to 70 to 75 dB $L_{A_{S_{max}}}$.
A.5 Healthcare Facilities

A.5.1 HTM 08-01 (2013): Acoustics

Guidance on recommended internal noise levels for healthcare facilities is given in HTM 08-1 (2013). For hospital wards, the criteria for noise intrusion from external sources are as follows (to be met inside the space):

Daytime: 40 dB $L_{Aeq,1h}$
Night: 35 dB $L_{Aeq,1h}$
Night: 45 dB $L_{Amax,F}$

For operating theatres, an internal noise limit of 40 dB $L_{Aeq,1h}$ and an event limit of 50 dB $L_{Amax,F}$ is applicable.

The $L_{Amax}$ limit is defined in HTM 08-01 as being applicable to events that occur several times during the night (for example passing trains) rather than sporadic events.

Specific guidance is given to the control of noise in external areas in hospitals:

The following guidance provisions should apply, with the most stringent taking precedence:

- Noise levels at the site boundary should meet reasonable standards required by the local authority or other relevant body.
- Noise outside the buildings should be controlled to allow the internal noise criteria to be achieved (with windows or trickle vents open for ventilation if the space is naturally ventilated).
- Open external areas should be protected. Noise from services should not exceed the existing daytime background noise level or 50 dB $L_{A90}$, whichever is the higher. This limit should be achieved in any areas normally occupied by staff (except maintenance staff, notwithstanding the requirements of the Control of Noise at Work Regulations 2005) or the public (for example open courtyards and accessible landscaped areas). This means that noisy plantrooms should not face normally occupied external areas unless adequate acoustic control is provided.

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1 Specialist Services, Health Technical Memorandum 08-01: Acoustics, Department of Health, 2013
Allowing for a sound reduction of 10 to 15 dB through a partly open window, an external noise limit of 50 to 55 dB $L_{Aeq,1h}$ would ensure recommended levels inside a ward are not exceeded during the daytime.

The guidance provides provision for relaxation of these criteria for emergency situations and sporadic events (such as helicopter flights) subject to agreement by the local authority or other relevant body.
LEGEND:

Noise Contours: 51, 54, 55 and 57 to 66

$\text{dB L}_{\text{Aeq,16h}}$ in 3 dB steps
APPENDIX 3

GENERAL AVIATION FACILITIES IN
THE JOINT LOCAL PLAN AREA
BRUTON KNOWLES LETTER – SURPLUS FORMER OPERATIONAL PROPERTY AT FORMER AIRPORT SITE
Date: 05 January 2018
Our ref: ADP/LB/518199
Your ref: 

Plymouth City Airport Limited
Tin Quay House
North Quay
Sutton Harbour
Plymouth
PL4 0RA

FAO: Mr J. Schofield

Dear Sirs

Surplus Former Operational Property, Plymouth City Airport, Plymbridge Lane, Plymouth, PL6 8BW

1.0 Introduction

1.1 I refer to your request to review and comment on the letter from Mr Ifan Rhys-Jones of Listers Property Consultants to Mr R Witherall dated 26 October 2016 (which was submitted with FlyPlymouth’s Regulation 19 representations in April 2017). This seeks to support Fly Plymouth’s view that it will be able to create a positive revenue stream from the existing former airport buildings. As instructed I have reviewed the letter in respect of Plymouth’s occupational market.

2.0 Background on Bruton Knowles, Property Consultants

2.1 Bruton Knowles is a leading firm of property consultants based in thirteen locations across England and Wales including Plymouth as discussed below. The firm has 150 partners and staff providing high quality, focused advice to a wide variety of clients in the public, utilities, commercial, rural and charities sectors.

2.2 The practice is a private partnership although the firm is managed through a corporate structure with the emphasis on skills and the precise alignment of services with the requirements of each sector and each client.

2.3 Delivery of services is based on seven key skill faculties:

Professional Services
Agency
Building Consultancy
Compulsory Purchase & Compensation
Development and Planning
Rating
Valuation

2.4 The firm operates in six key client sectors: -
Commercial
Public Sector & Blue Light
Utilities & Transportation
Rural
Charities
Social Housing

2.5 Accreditations:-

Environmental Standards – EN ISO 14001:2004
Investors in People – held for 15 years
Health and Safety – Achilles UVDB and CHAS accredited

2.6 The Plymouth based team comprises Ashleigh Phillips BSc (Hons) MRICS IRRV (Hons) Registered Valuer (Professional and Valuation), Ian Le Grice BSc (Hons) MRICS (Property Management), , Glenn Kelly BSc (Hons) MRICS Registered Valuer (Valuation) and Mark Slade DipSurv (Agency) along with Phil Trevail MRICS and George Mitchell (Graduate Surveyor). Regional Building Surveying is provided by teams in our Bristol and Gloucester offices. Between them the local team has in excess of 100 years of commercial property experience of which over 50 has been spent within the Plymouth market.

3.0 Background on Ashleigh Phillips Partner BSc (Hons), MRICS, IRRV(Hons), RICS Registered Valuer

3.1 This letter is prepared by Ashleigh Phillips. I am a Member of the Royal Institution of Chartered Surveyors and a Registered Valuer under the RICS VRS Scheme. I am also a Corporate Member of the Institute of Rating Revenues and Valuation.

3.2 I am a Partner of Bruton Knowles and head of their Plymouth office. My principal areas of work are the provision of advice to clients on valuation, acquisition, compulsory purchase, landlord and tenant and non-domestic rating matters.

3.3 I have prior experience in the role of Expert Witness including preparation of written representations and attendance in person for matters before Court, Valuation Tribunals, Independent Experts and Arbitration.

3.4 My specific experience for the matter in hand includes valuations, lease renewals/rents reviews and business rates appeals on numerous industrial and office properties within Plymouth and specifically the estates to the north of Plymouth. Local examples include:-

The Ship, Brest Road
Barden Corporation, Plymbridge Road
NBN, Airport Business Centre, Thornbury Road
Former Paper Converting, Southway Drive
Drake Mill, Estover Road
2 Bush Park
Prior to joining Bruton Knowles in February 2014, I was an Associate and Head of Business Rates at Vickery Holman in their Plymouth office between 2007 and 2014 undertaking a similar caseload. Previously I was a Partner at Drew Pearce Chartered Surveyors in their Plymouth office between 2004 and 2007 and an Associate Director at Lambert Smith Hampton in their Oxford office between 2000 and 2004.

I have approximately 24 years of experience dealing with the above areas of work on a variety of commercial and residential properties of which 15 years has been spent in the Plymouth and South West markets.

Executive Summary

I have considered the advice letter dated 26 October 2016 prepared by Mr Rhys-Jones BSc MRICS of Listers Property Consultants.

I note that their advice is not a valuation but an “appraisal” and marketing advice. There is no strict definition of an appraisal, but I take this to mean that the figures he quotes would be marketing or asking rents.

Listers acknowledge the challenges that a marketing agent would face when offering the existing buildings and land to the market; both in terms of securing interest in the context of the demand conditions within the property market and having regard to the condition of the buildings.

In my opinion, based on established patterns of rental evidence, the levels of the rents being suggested are ambitious and there are a number of significant practical issues and cost items which are not covered, which are important to the overall context of the reuse of the existing buildings. These are as listed below:

The office buildings are largely inward facing and therefore a reorientation of the entrances would be required.

The buildings will require substantial upfront works in order to bring them up to a satisfactory standard to appeal to the current occupier market and to ensure that they are secure outside of the perimeter of the airport.

I would have anticipated that Fly Plymouth would require some or all of these buildings for the operation of the airport itself, whether offices or hangar facilities.

In the cases referred to in this report I have not made any allowance for property management, asset management, letting or legal fees in regard to the property, which would be unrecoverable from the tenants. In the local market such fees would typically be:-

Agency fees - 10% of the first year’s rent plus marketing costs (typically £5,000 - £6,000 for the properties on the site (to include, brochures, boards, web and print advertising).
Legal fees – approximately £3,000 per lease for the office/warehouse premises and in the event that the Terminal building is refurbished to provide a serviced office centre (micro hub) we would assume standard estate leases could be produced for circa £600 - £750 per letting

Property Management – as an operational entity there would no doubt be significant ongoing management of the whole site and it would be unreasonable to recharge a full proportion of this to any commercial tenants. Whilst some tenant contribution could be expected to common areas and services, it would not cover the full cost; as such the landlord would be liable for the shortfall.

If a separate service charge schedule were established for any commercial occupiers only, the landlord would be required to contribute to this service charge to cover void periods and any area of accommodation retained. The commercial reality is that any incoming tenants would require certainty on service charge contributions and in all likelihood insist on a cap on their service charge contributions. If such caps are agreed below the level of the actual expenditure then the landlord would be liable to contribute the difference, thus reducing the gross rents received.

I am advised by Plymouth City Airport Limited that the buildings currently have sufficient servicing connections in terms of power and utilities for commercial uses.

I have assumed that the cost of the works allocated is sufficient in order to put them into reasonable condition to appeal to today’s potential occupiers and secure EPC ratings of E or better.

Our understanding is that Fly Plymouth’s plan is to create additional revenue/cashflow from the reuse of the existing buildings on the site, despite our view that they will require some or all of these buildings in order to run their proposed operation. The result, as will be seen from paragraphs 5.4 and 6.5 below, is that the buildings are highly likely to result in a negative revenue stream over an assumed 10 year period.

In terms of commenting on Listers letter, in particular around the demand and the lettability of the individual buildings and land, I make the following observations.

**Terminal Building, Airline Offices and Two Storey Jubb Offices**

There are three buildings comprising a total of c.19,354 sq ft. However, given their age, they are highly unlikely to secure an EPC rating of E and are not currently in a condition fit for occupation. As such, they would require significant upfront capital expenditure and these works would be required to be undertaken ahead of any marketing.

The occupational market for buildings of this nature would be very limited as they would not conform to modern standards and certainly not attract good quality corporate occupiers. The location for office use is inferior. Moreover, in my opinion a realistic marketing period to achieve substantive occupation would be between 18-24 months. With likely term lengths of 5 year terms I would expect prospective tenants to also seek break clauses and a rent free period of 6 months.

I would anticipate that approximately £50 per sq ft is required to refurbish and reconfigure these buildings into a condition in order to secure tenants. A target headline rent is likely to be in the region of £8.00 per sq ft, given the nature, quality and location of the buildings. Having regard to
paragraph 4.8 I have assumed letting voids and rent free periods in line with market evidence and assuming a timescale for the refurbishment. These are set out in the following table and can be evidenced by market transactions and adopting a realistic refurbishment timescale.

5.4 My simplified cashflow is as follows:

<table>
<thead>
<tr>
<th></th>
<th>Cost</th>
<th>Revenue</th>
</tr>
</thead>
<tbody>
<tr>
<td>Initial Capital Expenditure (£50psf)</td>
<td>£967,700</td>
<td></td>
</tr>
<tr>
<td>Void costs (18 months)</td>
<td>£98,706</td>
<td></td>
</tr>
<tr>
<td>Rent Free (6 months)</td>
<td>£65,804</td>
<td></td>
</tr>
<tr>
<td>Rent (£8.00 psf)</td>
<td></td>
<td>£131,608</td>
</tr>
<tr>
<td>10 years accumulative cashflow</td>
<td>£1,132,210</td>
<td>£1,052,864</td>
</tr>
</tbody>
</table>

Note: Please note I have not measured the buildings personally but I have cross referenced the areas provided within Listers’ letter and they are agreed. I have assumed a best case of gross to net area of 85% for the purposes of the offices given they would need to be sub divided to provide circulation space, common areas and reception (19,354 sq ft to 16,451 sq ft).

5.5 As the table above demonstrates the 10 year cashflow would produce a negative return of around £79,346 over this period. This assumes the buildings are fully let within 18 months and are also fully income producing for the remaining 8 years of the 10 year cashflow post completion of the capital expenditure and void period, which I consider extremely ambitious given likely re-letting voids during this period. The cashflow does not include the non recoverable costs set out in Paragraph 4.8 which would reduce gross revenue figure and therefore increase the negative return by an equivalent amount. I would estimate this to be a minimum of £25,000 + VAT of fees plus unrecoverable service charge.

6.0 **Vosper & Southern Hangar and Fire Station**

6.1 The three buildings total c.32,111 sq ft (GIA) of warehouse space requiring significant capital expenditure in order to make them secure and fit for occupation in today’s market. I consider it unlikely that in their current condition the buildings would achieve an EPC rating of E or better, which would be required in order to let buildings from 1st April 2018.

6.2 The occupational market is reasonable for industrial/warehouse property, however, the configuration, quality and access to these particular buildings is significantly inferior to the purpose built estates located around central/north Plymouth. I believe the target rents quoted by Listers at £5.00-£5.50 per sq ft are unachievable here, but with the appropriate upgrading they would secure around £3.00 per sq ft.

6.3 In order to bring the units up to a lettable condition, improvements are required to ensure that they appeal to the current occupier market. In addition secure fencing, an appropriate area of circulation space, yard, and an access road would be required. I would anticipate the initial capital expenditure on these items would equate to at least £15 per sq ft to put these buildings in to a condition in order to secure tenants. Again I would assume appropriate void periods and associated
costs, rent free and property management services would impact yet further on gross rents received.

6.4 Following the initial capital expenditure that would be required to bring the buildings up to a lettable condition, in my opinion prospective tenants would not take uncapped full repairing and insuring leases. Therefore, further costs leakage would be incurred by the landlord during the lease terms and at the end of the tenancies due to irrecoverable dilapidations (particularly on issues such as the roofs).

6.5 Our simplified cashflow is as follows:

<table>
<thead>
<tr>
<th>Cost</th>
<th>Revenue</th>
</tr>
</thead>
<tbody>
<tr>
<td>Initial Capital Expenditure (£15 psf)</td>
<td>£481,665</td>
</tr>
<tr>
<td>Terminal/Ongoing Capital Expenditure (£5 psf)</td>
<td>160,555</td>
</tr>
<tr>
<td>Void (18 months)</td>
<td>£144,500</td>
</tr>
<tr>
<td>Rent Free (6 months)</td>
<td>£48,167</td>
</tr>
<tr>
<td>Rent (£3.00 psf)</td>
<td></td>
</tr>
<tr>
<td>10 years cashflow</td>
<td>£834,886</td>
</tr>
<tr>
<td></td>
<td>£770,664</td>
</tr>
</tbody>
</table>

Note: Please note I have not measured the buildings personally but I have cross referenced the areas provided within Listers’ letter and they are agreed.

6.6 As the table above demonstrates the 10 year cashflow would produce a negative return of around £64,222 over a 10 year period. This assumes the buildings are fully let within 18 months and are also fully income producing for the remaining 8 years of the 10 year cashflow post completion of the capital expenditure and initial void, which I consider ambitious, given likely re-letting voids during this period. The cashflow does not include the non recoverable costs set out in Paragraph 4.8 which would reduce gross revenue figure and therefore increase the negative return by an equivalent amount. I would estimate this to be a minimum of £80,000 + VAT of fees plus unrecoverable service charge.

7.0 Car Parking, Open Storage & Leisure Uses

7.1 I do not believe there would be any substantive demand for car parking at this location given the poor proximity to major occupiers and the fact the NHS has recently built a multi-storey car park. The only tangible demand might possibly come from the University of MARJON. That said, the cost of creating and managing such an operation is expensive, given the need for an appropriate surfacing, lighting, secure fencing and day-to-day management.

7.2 I also consider the demand for open storage land would require a significant amount of capital expenditure in order to appropriately surface, fence, light and provide utilities. In this context, I feel it would be cost prohibitive to facilitate such a use. Nearby storage land is available at Eaton Business Park, Thornbury Road, Estover which is an established open storage park, with superior accessibility. At Plymouth Enterprise Park at Ernesettle (approximately 3.5 miles to the west), there
is a large site for open storage on the site of the former Toshiba factory. The site is partly occupied but further land remains available.

7.3 I do not believe there would be any tangible demand from the leisure market. Uses including children’s play centre, trampoline park etc, are already well catered for in the Plymouth market, particularly to the north of the City. Nearby facilities in this sector include Adrenaline Trampoline Park and Clip and Climb at The Ship, Derriford, Jump Indoor Play Centre, at Christian Mill, Drake’s Den Play Centre, Drake Mill Business Park, Estover and The Climbing Hangar which is opening shortly at Burrington Way, Plymouth.

8.0 Conclusion

8.1 In summary, given the practical issues, age of the buildings, the occupational demand and likely achievable rents, I cannot see Fly Plymouth creating a positive and sustainable cashflow from these properties from which to rely on within any business plan.

Yours sincerely

Ashleigh Phillips BSc (Hons) MRICS IRRV (Hons)
Partner - Registered Valuer
A Concept Masterplan for PlymVale
a new garden suburb for Plymouth
Plym Vale, the former airport site, is in the north east of the Plymouth local authority area, and next to to the University of St Mark and St John, Derriford Hospital, Plymouth Science Park and existing residential areas.

Since the closure of the Airport in December 2011, as a strategically important brownfield previously developed site, Sutton Harbour Holdings plc has been considering options for the future of the site, culminating in the current Vision for the garden suburb comprising homes, community facilities, shops, a rehabilitation village, first class community sports facilities and expansion space for University of St Mark and St John, all fully accessible on foot and by bicycle.

Plym Vale has been developed and evolved by Leslie Jones Architecture following consultation events with local stakeholders. The masterplan vision has been designed to address the widely acknowledged lack of connectivity within the northern part of the city, stitching together existing communities and offering a new way of living for the 21st Century, minimising the need to use vehicles for day-to-day journeys.

At the heart of the Vision is a partnership with University of St Mark and St John University which will see the University provided with new teaching and first class community sporting facilities along with new student accommodation. Taken together with the rehabilitation village and Derriford Hospital, there is an opportunity to create a regionally significant centre for Health and Wellbeing for Plymouth.

The masterplan vision provides opportunity for:
• New University Facilities
• Student Accommodation
• Veterans’ Rehabilitation Village
• Substantial Green Space (including first class community sports facilities, village green, pocket parks and allotments)
• A New Community Hall
• Primary School
• Health and Community Facilities
• A New Sports Arena
• 150 Bed Hotel
• Up to 1,500 New Homes (including affordable housing)

a concept masterplan for a contemporary community