



8 January 2018

**FLYPLYMOUTH STATEMENT TO THE PLYMOUTH AND SOUTHWEST DEVON JOINT LOCAL PLAN
2014-2034 EXAMINATION IN PUBLIC**

1. OBJECTION TO POLICIES SPT8 and PLY42

- 1.1. FlyPlymouth objects to Policies SPT8 and PLY42 safeguarding the Airport site on the basis that they are reviewable at five years. In our view, this limitation potentially weakens the safeguarding. Our objections have been set out at length in the Regulation 19 submission made by FlyPlymouth (see points 11.1 – 11.6). In short form these may be repeated as:
- 1.2. A five-year review period would risk discouraging investors who seek a longer period for their investments to yield returns.
- 1.3. A five-year review period would risk the current leaseholder seeking to frustrate the Joint Local Plan by sitting on the site until the review period has expired.
- 1.4. Such policies are meaningless if the Local Authority does not set out a process for consolidating the freehold and bringing the site to market.
- 1.5. The Local Authority must make clear that it is not prepared to allow the site's return to aviation be frustrated by vexatious challenges and delays.
- 1.6. Planning safeguards on sites to the east of the airport should be reintroduced to ensure that future operations are not prejudiced by adjacent development.

2. SUPPORT FOR POLICIES SPT8 and PLY42

- 2.1. The question before the hearing asks whether Policies SPT8 and PLY42 safeguarding the potential future re-use of Plymouth airport as a general aviation airport until the five-year review of the JLP are appropriate and justified by robust evidence.
- 2.2. Plymouth Airport is an airport. It is equipped with the infrastructure required to deliver general aviation services (see Policy PLY42). The site and equipment has been allowed to deteriorate under closure but the extent of this deterioration has been quantified and reported on in February 2017 by the City Council.
- 2.3. The site is unique and irreplaceable transport infrastructure within the Plymouth area. It is uniquely suitable as an airport there being no other sites suitable for an airport in the Plymouth area as York Aviation found in its study (2006). While being potentially capable of residential development, any economic value and growth benefits from residential use could equally well be delivered by other sites within the Plan area.
- 2.4. The airport operated for many years as a licensed facility. Our meetings with the Civil Aviation Authority and those involved with licensing the site prior to its closure have shown consistently that there is nothing to prevent the site's being licensed again in future provided it complies with *CAP 168*.

- 2.5. Plymouth airport was closed in 2011 by its present leaseholder with a view to disposing of the site for 'best value' in accordance with the terms of its lease. Our team met with the Leaseholder shortly before closure at which time it was made clear to us that continuation of any form of aviation at the site was not on the table.
- 2.6. This position was set at a time when the evidence produced for the Local Authority by Berkley Hanover had already flagged that general aviation use of the airfield would be viable and sustainable and that more than one party was interested in such an operation. The Leaseholder advised us that more than one party had shown interest in continuing aviation at Plymouth.
- 2.7. Our understanding then is that the site has been for sale for the past six years but no transaction has been effected as the Leaseholder has not been willing to consider selling based on existing use. More than one party was interested in taking on and operating that site at the point of closure and the airport may conceivably have continued to operate in a different mode had a deal been accepted based on existing use.
- 2.8. In 2014, Plymouth City Council commissioned the '*Final Study*' from Arup which agreed with the work of Berkley Hanover that general aviation would be viable at Plymouth Airport. The risks were identified and manageable and the site might be safeguarded on this basis with a view to improving Plymouth's long-term transport deficit.
- 2.9. The policies in the JLP then, are based on consistent evidence that GA is viable at Plymouth Airport. The only evidence to challenge this has been produced for and on behalf of the Leaseholder. There are many licensed and unlicensed general aviation airfields in the UK that operate sustainably. There is nothing exceptional about Plymouth in terms of general aviation suitability.
- 2.10. The public consultation process has shown strong and consistent support for retention of Plymouth Airport.
- 2.11. In 2015, the Department for Transport published its *General Aviation Strategy* which showed that the UK GA sector is the grass-roots of the Commercial Aviation Industry. It found that GA supports 38,000 FTE positions and is worth £3bn to the UK economy.
- 2.12. In December 2017, the Secretary of State for Transport appointed the UK's first GA Champion, Byron Davies to work within the Department for Transport and lead on the work of identifying and helping to safeguard the UK's strategic network of general aviation airfields and advancing GA policy.
- 2.13. In January 2018, the Secretary of State for Communities and Local Government wrote to the All Party Parliamentary Group on General Aviation to say that in respect of issues such as airfields being deemed brownfield, "Planning policy needs to balance support for general aviation within the broader framework of sustainable development." Accordingly, he has asked his officials to review the policy in this area to determine whether the balance is correct.
- 2.14. Clause 33 of the NPPF and clauses 1.86 – 1.91 of the Aviation Policy Framework (APF) support the retention of access to a network of general aviation airfields within the UK and require recognition of their value in supporting training, skills, business aviation emergency services, amenity flying and so on.
- 2.15. FlyPlymouth has produced detailed plans for its approach to general and business aviation on the site. These plans together with evidence of funding have been submitted to the JLP consultation as an appendix to our Regulation 19 representation.

- 2.16. FlyPlymouth is backed by investors that have completed initial due diligence and are more than capable of funding the business. Heads of terms have been reached with strategic aviation investors that will bring immediate commercial momentum to the reopening of Plymouth airport for GA use.
- 2.17. Our plans show that capital expenditure of £0.7-£1.5M is required to deliver a general aviation business at Plymouth Airport and a further £1.04M of funding to get the business to break even. Significant cost control levers exist to match Opex to business volumes and control cash burn. Sensitivity analysis of the aviation and non-aviation aspects of revenue both show that this is a manageable business that our investors are happy to fund from the private sector.
- 2.18. In addition to the investor support, FlyPlymouth has heads of terms in place with key customers and interest from a number of other clients that will be progressed as we work towards securing a lease. These include, fixed base operations, handling, fuel, flying schools, air taxi and charter services and engineering operations.
- 2.19. FlyPlymouth's core team includes experienced competent persons able to deliver the various aviation operations in compliance with regulatory requirements.

FlyPlymouth has written at length on these matters in its submissions and is happy to answer further questions in clarification. However, it seems plain to us for the reasons set out here, that the Policies PLY42 and SPT8 are both appropriate and justified given the removal of the five-year review period. They are appropriate in terms of both local and national policy and Plymouth's needs for transport improvements that cannot be delivered by alternative modes. And they are justified by the official evidence that has consistently found general aviation would be viable at Plymouth airport. Evidence that is supported by our own plans and has the confidence of our investor groups.

FLYPLYMOUTH LTD

18 Genesis Building, 235 Union Street, PLYMOUTH PL1 3HN