

General Aviation Awareness Council

Implications of the National Planning Policy Framework July 2018

The new NPPF, published in July, contains new provisions relevant to the General Aviation community as they serve to reinforce the protection given to GA airfields¹ by the planning system.

Although it has not been possible to achieve clarity on the “Brownfield” issue there is now enough overlapping legislation within the NPPF to imply the level of protection airfields need and to challenge the developers view that they are large areas of cheap building land.

Our advice to any airfield owner is to comply with the new provisions and ensure that your local authority not only recognise the airfield’s status, not just as an airfield but as part of a national network and therefore the need for it to be form part of any future local or strategic plans.

The new NPPF, which provides the overall framework and guidance for Local Planning Authorities in England, inserts two paragraphs recognising General Aviation for the first time in planning terms.

New paragraph 104 reads:

‘Planning policies should....

(f) recognise the importance of maintaining a national network of general aviation airfields, and their need to adapt and change over time – taking into account their economic value in serving business, leisure, training and emergency service needs, and the Government’s General Aviation Strategy.’

This is an important change. It means:

- For the first time, general aviation airfields have a status in the planning process and this can be used to argue more strongly for development needed at airfields.
- The recognition of ‘adapt and change’ opens the door for new activities and infrastructure essential to aerodrome viability to gain a smoother ride through the planning process.
- The cross-reference to the Government’s General Aviation Strategy specifically allows this document also to be a consideration in the planning process.

¹ The ANO refers to ‘aerodromes’ but for ease of use we have kept to ‘airfields’ in this note.

- As this wording is in the section of the NPPF '*Promoting sustainable transport*', it gives General Aviation higher status as a part of the transport infrastructure.

The provisions of the NPPF apply to the development control process when planning applications are considered but, as paragraph 104 refers to '*Planning policies*', this new wording also places a requirement on planning authorities to consider any GA airfields in their plan making activities.

Currently, few GA airfields are identified, protected or promoted in Local Plans. Local planning authorities must now consider if an airfield should have its own planning policy, which would have to provide for change to occur.

It will also be open to airfields to press authorities to do this, setting out the value of the site and its need to be able to change over time. It has, of course, always been open to airfields to seek a protective / promotional policy but they will have an improved chance of achieving this under the new NPPF.

The second change in the NPPF is in the Glossary at Annex 2, where a new definition has been inserted:

'General aviation airfields: Licensed or unlicensed aerodromes with hard or grass runways often with extensive areas of open land related to aviation activity.'

This change is positive in two respects:

It gives status to GA sites that has not previously been included in planning guidance.

It gives the same status to licensed and unlicensed aerodromes.

The Brownfield Issue

The GAAC along with many others sought another change in the NPPF which would have specifically excluded 'land that is or has been used for aviation purposes from the definition of '*Previously Developed Land*'.

This change was not accepted and some may still incorrectly assert that all of any airfield is 'previously developed'. The GAAC will continue to press for clarification that only the built parts of an airfield *may* in some circumstances be defined as 'previously developed' and therefore at risk of pressure to be redeveloped.

However, the wording in the new paragraph 104 and the glossary reference to '*extensive areas of open land*' do assist in countering this misinterpretation.

In addition, the glossary definition of 'Previously developed land' continues to make clear that there can be no assumption that all land within a curtilage of a previously developed site is available for development.

*'Land which is or was occupied by a permanent structure, including the curtilage of the developed land (**although it should not be assumed that the whole of the curtilage should be developed**) and any associated fixed surface infrastructure...'*

If you have any questions or require clarification on a situation the GAAC exists to provide free initial advice and would consider taking specific cases forward for a pre- agreed fee.

Contact: planning@gaac.org.uk

30 August 2018