



The General Aviation Awareness Council

President: The Lord Rotherwick

Return Address

GAAC

c/o LAA

Turweston Aerodrome
Biddlesden Road, Brackley
Northampton NN13 5DY

e-mail: info@gaac.org.uk
Website: www.gaac.org.uk

The Rt Hon Robert Jenrick MP
Secretary of State for Housing, Communities and Local
Government
Ministry of Housing, Communities and Local Government
2 Marsham Street
London, SW1P 4DF
Via Email

28 August 2020

Dear Secretary of State,

Planning for the Future August 2020: General Aviation Airfields

I am writing on behalf of the General Aviation Awareness Council (GAAC) in respect of the recent proposals published by MHCLG for reform of the planning system in England.

The GAAC constantly handles planning issues on behalf of General Aviation airfields and the intention to streamline the planning process, speed up decision making and increase certainty is welcomed. However, the way in which policies will be framed for General Aviation (GA) airfields is currently unclear and the GAAC would like to set out its initial response now while reserving the right to continue engaging with the proposed changes to the planning system as more detail emerges.

Formed over 24 years ago the GAAC works for the protection of General Aviation (GA) airfields throughout the UK. We currently represent the interests of over 30 Associations including Light Aircraft (LAA), Owners & Pilots (AOPA), Airfield Operators (AOG), Gliding (BGA), Helicopters (BHA), Business GA (BBGA), Microlights (BMAA), Aero modellers & UAV's (Drones) together comprising in excess of 40,000 active members and, supporting the provision of trained aviation specialists for commercial and military Aviation.

Our reputation for accrued professional knowledge and collective experience has led to the GAAC working in conjunction with the DfT, providing advice and data on a range of aviation related matters including surveys and policies to develop the industry and its Strategic Airfield Network. As a 'broad church', we have also welcomed opportunities to work with complementary organisations including Local Authorities, Centres of education, Sport England, the RSPB and CPRE.

The GAAC also has close links with the All Party Parliamentary Group for General Aviation. Two of its five Working Groups are Chaired by GAAC Directors, and six of the Airfields Working Group members, including the Chairman, are GAAC Directors, it is therefore fully conversant with current issues and Government policies relating to GA. The advice and guidance we provide to airfield owners, operators and Local Authorities nationwide largely focuses on town planning, safety, environmental and legislative matters.



In 2015 the General Aviation sector contributed £3.3 bn to the UK economy. Since then it has steadily increased and has been reported more recently at over twice that level by industry media. GA is a vital element of the UK's transport infrastructure, providing the 'grass roots' that support our world class commercial aviation and aerospace industry by offering an important entry point for the pilots and engineers of tomorrow. Accordingly, General Aviation Airfields are critical sites that need to be available for the accommodation of the transport and logistics infrastructure of the future – including the new generation of electric aircraft, UAVs (drones) and air taxis now emerging.

The 2018 NPPF introduced new provisions for General Aviation obligating local planning authorities to shape their policies to recognise the importance of maintaining a national network of general aviation airfields and the need for them 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. Some planning authorities have already adopted local plan policies which specifically identify GA airfields, encourage aviation related development on such sites and protect the sites from the threat of inappropriate development which would inhibit GA's utilisation of the site. In other cases, where Local Plans are still emerging, local planning authorities are being encouraged to include similarly positive policies.

One of the stated objectives of the Department for Transport's Aviation Strategy is to support General Aviation which, critically, includes promoting the provision of this aviation infrastructure.

Understandably this initial consultation document does not comment specifically on how GA airfields would be protected under the new proposals so it is essential that further guidance on the status of GA airfields is provided by MHCLG to avoid local authorities, particularly where Local Plan policies are not compliant with the NPPF, placing them in the wrong zone.

As a general rule the GAAC considers the 'Renewal' Zone to be the most appropriate for established GA airfields. This allocation would give certainty to the airfield owners and operators that development according with the NPPF wording would, in principle, be acceptable. However, this requires the 'Renewal' definition to be extended beyond the current assumption that the Zone would generally relate to urban or brownfield locations.

The Paper regularly refers to 'Infrastructure', particularly when adding clarity. We believe it may be more appropriate to simply designate Infrastructure as a fourth zoning category as this will also benefit other types of land use comparable to GA Airfields that may not easily fit into the current three categories – for example, hospital grounds and cargo ports. We believe this suggestion to be a sensible addition to your proposals.

GA airfields still face a number of challenges inherent in the current system. The proposed changes offer an opportunity to remove some of those challenges, increase certainty and facilitate increased investment in General Aviation, with attendant direct benefits for the local economy, particularly employment, near the airfield that can spill over into surrounding of the area. Some examples of these challenges that emphasise the need for a clear approach and policy are set out below:

- a. Development at airfields can meet resistance from local residents – this can deter valuable and necessary investment and significantly add to the cost of the planning process. Zoning of GA airfields as 'Infrastructure' or 'Renewal' sites would clearly identify their importance and reduce this resistance, often from residents who have moved into an area but failed to check on the proximity and activities of an existing airfield. GA operators are normally considerate and would ensure that issues such as noise levels would remain acceptable.
- b. In some cases entire airfields have been regarded as 'brownfield' and therefore 'available' for total redevelopment (despite planning guidance caveats) – this has created uncertainty, deterred investment and led, in some cases, to prolonged planning battles. Zoning should bring clarity and certainty.

- c. Some GA airfields are located in the Green Belt – it is essential to ensure that they are zoned as Infrastructure and/or Growth and not in the ‘Protected’ category to recognise their infrastructure / aviation value.
- d. GA airfields need ‘safeguarding’. The system was originally devised for major airports to minimise the risk of harm to aircraft and those on the ground during landing and take-off which could otherwise be caused by built structures, trees and other features. However, other safeguarding factors are also critical to GA airfields – in particular the requirement to protect from any development areas which may be needed when an aircraft engine fails or some other fault occurs (this is infrequent but does happen and is particularly relevant when single-engined aircraft are in use for training purposes). Zoning of GA airfields as ‘Infrastructure’ or ‘Renewal’ sites should specifically refer to the safeguarding requirements.

Despite its importance to the UK, General Aviation continues to face challenges particularly in relation to the protection and upgrading of airfields. There is plenty of demand for flying sites but only a limited supply available, often due to planning constraints. The vast majority of today’s airfields were built to serve the UK during the Second World War, those that remain have survived a 70 yr process of natural (and unnatural) selection. Unlike Europe, very few new airfields have been built since 1945. The reality is that once those we have disappear, the current system will ensure they are gone for ever.

We already know from our initial studies that if any further airfields are lost from this remaining network it will seriously undermine the ability of the General Aviation industry to provide the connectivity, employment and training facilities that the UK requires to support a first class aviation industry.

The age of electric flight is dawning, European Aviation Safety Agency (EASA) certified the first all electric training aircraft earlier this year and UK certification is imminent. The sea change in operability and pricing this brings is likely to have a major impact on demand and, put General Aviation at the forefront of applying green transport technology. The sector needs certainty to stimulate its growth and the new planning system can make a major contribution to achieving this objective if properly and carefully formulated.

The GAAC is very willing to work with MHCLG to get this right. In particular, organisations involved with the GAAC/APPG alliance, are working with the Department of Transport on the definition of a national network of Strategically Important GA Airfields which will include most of those sites where zoning is necessary and appropriate.

Yours sincerely,

John Gilder FRAeS
Vice Chairman

General Aviation Awareness Council

E: planning@gaac.org.uk
M: 07768 282261

CC: The Rt Hon Grant Shapps MP - Secretary of State for Transport
Kelly Tolhurst MP - Minister for Aviation
The lord Rotherwick - President of the GAAC
Lord Davies of Gower - Chairman APPG-GA