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Via Email

Dear Simon

Re: Paper requested by Ministry for Housing, Communities & Local Government

Elaboration on the GAAC's responses to consultation on the 'Planning for the Future' White Paper August 2020

Introduction

The General Aviation Awareness Council (GAAC) submitted representations and recommendations in response to the MHCLG's August 2020 White Paper Consultation on 'Planning for the Future'.

Our Paper explained the role of the GAAC and the range of aerodrome and aviation interests it represents. It drew attention to recent planning policy changes which give greater weight to the support and promotion of General Aviation infrastructure.

It proposed that in any planning reform implementing the key principles and thrusts of the White Paper, a fourth zoning category, '**Infrastructure**' should be added.

It explained the current need for this recognition and highlighted an even greater need for this in order to plan positively for the future.

Following a helpful virtual meeting involving MHCLG, DfT and GAAC representatives, we undertook to elaborate on our position, provide further information and advice to assist MHCLG in considering the proposal.



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'Infrastructure'

The November 2020 National Infrastructure Strategy (NIS) provides a clear context for the GAAC's recommendation. It emphasises the importance of aviation. It states, *'Infrastructure underpins the economy.'* and defines the first component of 'infrastructure' as *'Transport'*.

The July 2020 'New Deal' also refers to infrastructure projects, *'...fuelling jobs and economic recovery.'* The purpose of the mantra, *'Build build build'* is to *'... accelerate infrastructure projects, fuelling jobs and economic recovery.'*

Both see Infrastructure as a fundamental **catalyst**, in the UK's economic recovery.

Aviation does, and will increasingly, form a key component of transport infrastructure increasing connectivity, assisting the creation of jobs and stimulating economic recovery.

The proposed new planning system should be structured to add weight to the protection and promotion of all forms of infrastructure – especially *'transport, digital, energy and utilities'* as highlighted in the NIS Executive Summary.

The 2020 Planning White Paper promotes many worthy measures to simplify and streamline the current planning system. However, references to *'infrastructure'* in the White Paper are primarily focussed on that associated with supporting new residential or commercial development and the Infrastructure Levy; there is no reference to *'transport, digital, energy and utilities'*, the type of strategic infrastructure identified in the NIS.

The definitions in the Planning White Paper of the three zoning categories do nothing in support of the infrastructure visions set out in the New Deal or the NIS.

It is acknowledged that the National Policy Statements provide guidance for the planning of **nationally** important infrastructure projects but they do not address all such sites or projects. However, many 'non-nationally' important infrastructure sites are still of strategic importance.

The three zoning categories proposed in the Planning White Paper do not easily, or logically, embrace sub-national infrastructure. *'Transport, digital, energy and utility'* facilities are not necessarily located in *'Growth areas'*, or *'Renewal areas'*. In fact, 'Growth' and 'Renewal' areas are predominantly focussed on residential and employment development.

There is therefore a high likelihood of strategic infrastructure being located in what otherwise might, under the new system, be zoned *'Protected areas'*. In such circumstances, although schemes in protected areas must be considered on their merits, there would be a great deal of debate, uncertainty and delay incurring potentially large costs, in obtaining approval for changes at such sites to ensure their compliance with, and contribution to, infrastructure requirements such as flood prevention or energy supply.

In addition, the GAAC believes that there are, and will continue to be, infrastructure sites and projects, below the nationally important level, which should be specifically addressed in the new planning system to assist in meeting the Government's objectives for infrastructure and its attendant catalytic benefits to the economy.

We are aware of examples across the infrastructure spectrum and set out below more information about the issues specific to the protection and promotion of General Aviation aerodromes. We believe the principles of these points also apply to digital, energy and utility infrastructure.

‘GA Aerodromes’

The term General Aviation relates to the activity, not specifically size, of an aerodrome. ‘General Aviation’ is defined as all flight activities **except** those involving commercial air transportation or aerial work.

In practice, when referring to ‘General Aviation aerodromes’, this would generally exclude major international transport Airports, military Aerodromes and small private farm strips.

Within the category of ‘GA aerodromes’ however, there is great diversity – irrespective of whether or not the site is licensed by the CAA or not, its size, range of activities and facilities and also the extent of activity related to a site’s ‘Port of Entry’ function.

This diversity makes it difficult to identify precisely the number of sites to which the provisions of the new planning system might relate. We expand below on this but, at present, it is reasonable to assume that between 250 and 400 - 500 sites are involved.

As stated above, the nature of GA Aerodromes is diverse although there are a few common and consistent factors:

- a. Sites are generally comparatively large, in a range of between 150 – 600 ha, predominantly level and open areas as the whole site has a functional relationship with the activity of flying.
- b. Generally GA Aerodromes are near to populated areas but usually somewhat separate from them.
- c. Most GA aerodromes have changed and evolved over time – both in the range of flying activities taking place, the addition of ancillary services and new aviation technologies and through co-location of synergistic activity – such as energy generation.

In England, GA aerodromes therefore constitute a huge resource – contributing to connectivity and transport needs, facilitating business aviation, promoting flying training, STEM- related training and jobs, supporting emergency services and charities, offering recreational and leisure facilities and, most importantly in the current context, providing land in key locations for future infrastructure needs – in the ‘transport, digital, energy and utility sectors’.

Even with planning consent the cost of establishing new GA sites is almost prohibitive and it should be assumed that the ability to provide new Aerodromes in relevant locations is extremely limited; therefore the existing resources must be regarded as **irreplaceable**.

Current Challenges

There has never been clear planning policy determining how Local Plans should deal with most of the smaller GA aerodromes. However, as we explained in our first submission, the importance of GA now and in the future is increasingly being recognised by Government, the industry itself and in planning guidance. The current NPPF clearly refers to aerodromes being identified and protected in planning policy documents.

In addition, a combination of the demand for housing and the perception that airfields are cheap land ripe for development due to a lack of planning protection has meant a large number of aerodrome sites have already been lost and many others are under threat. These threats have a range of origins and raise a number of issues:

- a. **Constraints on Aviation related development:** Many sites have been lost or are under threat as development proposals which are necessary for the efficient functioning of an aerodrome have been refused for planning reasons – such as green belt, noise, visual impact. This has been experienced at a large number of sites over the last 20-30 years and continues. This has often been exacerbated by the ‘countryside’ local plan designation – which as outlined above, should not in future just be replicated by ‘Protected Area’ status.
- b. **Declining viability:** this is often directly related to an inability to improve the aviation facilities at a site. A clear policy provision to support aerodrome-related development and enhancement would give confidence to owners and operators at aerodromes to invest in the future.
- c. **Permitted Development Rights:** at present current planning Permitted Development rights, which would make development and change more achievable, do not apply to all aerodromes.
- d. **Intrinsic value not recognised by Local Authorities:** This experience may be because Local Plans and the Local Planning Authorities (LPAs) have not recognised the existence of or the intrinsic value of the Aerodrome; often because of a lack of understanding or local hostility, which can be related to poor communications between the aerodrome, the LPA and the local community.
- e. **The basis of valuing Infrastructure:** This needs to reflect regional and national factors. Recognition of the infrastructure value of strategically important GA aerodromes should, at the very least, require a comprehensive assessment and evaluation to be undertaken before a site is permanently lost.
- f. **Planning Perception and ‘Brownfield’:** In some cases the challenges outlined above are exacerbated by a view, espoused by some aerodrome owners and some planning authorities, (notwithstanding the caveat in the definition of Previously Developed Land in the NPPF), that all aerodromes are ‘brownfield’ and that this definition extends to the whole of an aerodrome site. This confusion (which in some circumstances may have been convenient) was given greater credence by statements made the Planning Minister in 2015.
- g. **Competing Priorities:** The clear and longstanding priority given to the development of housing and employment on brownfield land, as opposed to ‘Greenfield’, is entirely appropriate but this factor alone should not be used to justify the loss of strategically

important aerodromes with a valuable infrastructure role. Without clear policy protection for such sites as aerodromes, the 'brownfield' policy and or a 'Protected' zoning may continue to be given precedence.

- h. **Redundant MoD sites:** When MoD sites, particularly the grass airfields, are released as surplus to requirements, they are passed to the DIO which is charged with maximising the return to the Treasury. This leads to the value of GA activities taking place (or potentially viable on the site) and the contribution of the site to the community once MoD restrictions are lifted, being ignored completely or substantially underestimated.
- i. **The Value of GA:** Assessment of the 'value' of GA is often underestimated as it is based on conventional, but limited, economic assessments of the measurable aeronautical value, which ignores heritage, community, indirect and catalytic economic and employment contribution, visual, recreational, amenity and landscape value. Stronger protection for GA in planning policy should require any assessment of value to be more comprehensive.
- j. **Local Authority knowledge:** The majority of LPAs with an aerodrome within their boundaries only have one such site. More than three quarters have only one or two. This is detailed in Appendix 1. This means, and it is clear from the GAAC's experience that the level of understanding of GA operations, their actual and potential benefits to the regional & local economy and their infrastructure value, held by planning officers and Members is normally limited.

Raising the profile of GA sites through an infrastructure categorisation is important to address these historic challenges and, ideally, should be underlined by supporting guidance. There are a number of issues that need to be addressed:

- a. Guidance should encourage LPAs to co-operate (such as with minerals and waste planning and on other forms of infrastructure) to share technical understanding. The CAA should continue to enhance and develop its advice to aerodromes and LPAs.
- b. Independent technical advice is often invaluable to a LPA to assist in making the right judgment between protection / improvement of the aerodrome and the harm that development could cause.
- c. Protection of GA aerodromes is inadequate. The CAA's current guidance (for both licensed and unlicensed sites) is to lodge a 'Safeguarding Map' with the LPA and agree an arrangement for the aerodrome to be consulted on any planning applications which infringe the Map. However, other development which does not infringe the 'Obstacle Limitation Surfaces' on a Safeguarding Map could have a major adverse impact on the safety and, therefore, viability of aerodrome operations. The recent extension of the 'Agent of Change' principle to aviation activities is helpful but needs to go further. The CAA CAP 738 should be amended to assist. However, all elements of these processes could be simplified, particularly for strategically important aviation infrastructure sites, by a planning policy which gives general protection and a general principle that additional related development should normally be allowed.

In the absence of the proper recognition of important infrastructure sites in the new planning system, the challenges for GA aerodromes and risk of more being lost in perpetuity are bound to continue.

Future Opportunities

Aviation infrastructure is undergoing some fundamental changes. Unmanned Aerial Vehicles (UAVs) including drone deliveries and air taxis are on the verge of coming into use. More environmentally sustainable 'green' aircraft powered by electricity, hydrogen and multi-fuels are either already licensed, or about to be, in the UK. These two changes alone will significantly increase volumes of activity and the acceptability of it through noise and emissions reductions.

The resource of the network of strategically important GA infrastructure sites cannot be put at risk at this point in time without creating the equivalent of the Beeching mistakes.

Aerodromes, due to their scale and location can also be utilised in other, symbiotic ways:

- a. By more organisations that need to respond to situations in a flexible and speedy manner – equivalent to the Air Ambulance and Security Services.
- b. Advanced Air Mobility activity between hubs, for example including eVTOL aircraft.
- c. Electric vehicle charging points for cars as well as aircraft – bearing in mind the usual convenient access from residential areas and the road network.
- d. Energy generating sites for electric charging and for supplying to the grid or to energy dependent industries that could be accommodated in the equivalent to an aircraft hangar.
- e. The proving and testing of new forms of air transport.
- f. Local maintenance operations reducing the distances that currently need to be travelled for aircraft and helicopter maintenance.
- g. Storage facilities (again in hangar like structures) in discrete locations that may be more cost effective to use than mainstream warehousing sites.

The Way Forward?

A fourth zoning category should be included in any revision of the planning system that incorporates zoning principles – namely 'Strategically Important Infrastructure'. As well as aerodromes this could include other forms of transport, energy generation sites, other key utilities sites including ports.

Pages 28-29 of Planning for the Future should be amended to:

“Proposal I: The role of land use plans should be simplified. We propose that Local Plans should identify four types of land – *Growth* areas suitable for substantial development, *Renewal* areas suitable for development, *Infrastructure* areas to support growth and renewal, and areas that are *Protected*.”

Infrastructure should be defined as:

Infrastructure areas ‘to support growth and renewal’ – this would cover strategically important sites including regional airports and other strategically important aerodromes, ports, major transport hubs, energy generation and utility facilities. The principles of this category are that Strategically Important Infrastructure sites should be retained when in a use that is critical to support economic, strategic and social development at local, regional and national levels. The long term contribution to the economy of these areas and their sustainability may also be further enhanced with the emergence of new technologies and ancillary industries and, there would be an automatic presumption in favour of such changes.’

In respect of GA aerodromes the aviation industry is working with the DfT to identify a network of strategically important sites and all of these should be included within this zoning category. Selection should take account of location, proximity to centres of population and economic hubs, the range of facilities it currently provides, the presence of or need for emergency support services and the opportunities for growth and expansion as well as the contribution to the UK training network and the local community in which the site is located.

All airfields should have clear and consistent planning Permitted Development rights and LPA’s should be widely circulated. Perhaps some Prior Notification arrangements could also be included.

A mechanism for changing categories is essential.

In respect of Infrastructure Areas, and aerodromes as an example, there should be a provision for the Zoning to be reviewed on a regular basis, possibly five yearly to take account of changes in material factors such as technology, demography and demand. Any proposal to permanently remove the asset should require the proposer to adequately demonstrate the justification or otherwise for this and an Independent Planning Inspector then instructed to assess and adjudicate – based on viability, the degree of criticality within the overall network and contribution to the local economy and local community.

Conclusions

General Aviation is a key component of the UK’s transport infrastructure. With other elements of infrastructure it will contribute to economic growth, the provision of new, often highly skilled, jobs and stimulate recovery following the current health and financial challenges.

GA aerodromes have the ability to also provide more efficient forms of infrastructure in locations close to centres of population and economic hubs. They already form an integral part of infrastructure and have the ability to increase this contribution in the future, through changing technologies for moving people and goods. This needs to be properly recognised and integrated into future plans.

There is currently little consistency in the way GA aerodromes are treated in planning policy. Inadequate understanding of the requirements and functions of GA aerodromes and their value to the community frequently lead to issues and there are recurring anomalies around the application of planning policy and the necessity for operational safeguarding at airfields.

A major reform of the planning system, coincidental with its aims of consistency, speed and transparency, offers a valuable opportunity to recognise the strategic infrastructure importance of GA airfields, and provide long-term certainty and confidence to airfield owners, investors, aviation businesses and the local community. This exemplifies the type of clear positive planning so fully endorsed in the Planning White Paper.

After relative neglect for since World War Two, introducing an Infrastructure Zoning category would encourage positive planning for the future, optimise construction efficiency and maximise the opportunities to generate employment and economic recovery.

The GAAC would welcome the opportunity to continue working with MHCLG and DfT to refine the above terms and principles to accord with those set out for other sectors in the planning reforms.

Yours sincerely

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Appendix 1

Local Planning Authorities with GA Aerodromes

The number of LPAs that have aerodromes within their boundaries is relevant to the extent and nature of policy and guidance that should be provided in order to ensure GA aerodromes are given adequate protection through the planning system. Out of the 356 relevant English LPAs, 141 have aerodromes.¹ The breakdown of this is as follows.

Number of aerodromes within a LPA	Number of LPAs	Council	%
1	76		54%
2	33		23%
3	17		12%
4	10		7%
5	1		< 1%
6	0		
7	1	East Riding of Yorkshire Council	0.7%
8	0		
9	0		
10	0		
11	1	Cornwall Council	0.7%

¹ NB A number of the 267 aerodromes included in this initial analysis are RAF or other MOD, major international airports and private company aerodromes. All of these should be included in the 'infrastructure' category. However, policy and guidance will be of greater assistance to LPAs supporting GA aerodromes.