

GENERAL AVIATION ALLIANCE

Partnership in Aviation

President: Air Chief Marshal Sir John Allison KCB, CBE, FRAeS RAF(rtd)

Vice President: The Lord Rotherwick

Planning Policy Consultation

Changes to the National Planning Policy Framework with Regard to Airfield Planning Protection.

Dear Sir/Madam

I write to you with regard to the proposed changes to the National Planning Policy Framework, in particular with regard to airfield planning protection. I write on behalf of The General Aviation Alliance, (GAA); a group of organisations representing the interests of key organisations in the UK General Aviation (GA) industry, its employees and members. It was formed in 2004 to address the need for a co-ordinated response to UK regulatory issues. Members of the GAA include; British Balloon and Airship Club (BBAC); British Gliding Association (BGA); British Hang Gliding and Paragliding Association (BHPA); British Microlight Aircraft Association (BMAA); British Parachute Association (BPA); Helicopter Club of Great Britain (HCGB); Light Aircraft Association (LAA); PPL/IR Europe – European Association of Instrument Rated Private Pilots; Royal Aero Club of the United Kingdom (RAeC). The GAA coordinates about 72,000 subscription paying members of these bodies.

We are pleased to see progress being made by working groups, and in particular the All-Party Parliamentary Group on General Aviation, regarding the various issues that are leading to, on an all too frequent basis, airfield closures and their reallocation to other uses. Not only is this matter of concern to our pilot and enthusiast members, but also to all the aviation businesses based on those airfields and those further afield as the vital national network of GA airfields is being eroded. We believe that airfields play a vital role for the future, for recreation, sport and business, as well as a training ground for the future generation in engineering and aviation work-related skills.

We note that thanks to the activities of the APPG and others, that with the addition of Paragraph 105(f), the NPPF now explicitly recognises General Aviation for the first time. However, we would like to add our support to the APPG proposals for four further changes to be made:

- In paragraph 105, subsection (f), remove “*maintaining*” and insert “*protecting, maintaining and enhancing*”.
- In paragraph 180, after “*music venues,*” and before “*and sports clubs,*” insert “*general aviation airfields,*”
- In the Glossary at Annex 2, under the definition of Previously Developed Land, after “*This excludes:*” and before “*land that is or has been occupied by agricultural or forestry buildings,*” insert “*land that is or has been used for aviation purposes;*”

British Balloon and Airship Club
British Gliding Association
British Hang Gliding and Paragliding Association
British Microlight Aircraft Association

British Parachute Association
Royal Aero Club of the United Kingdom
Helicopter Club of Great Britain
Light Aircraft Association
PPL/IR Europe

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- In the Glossary at Annex 2, insert the following new definition: *“General aviation airfields: Licensed or unlicensed aerodromes with hard or grass runways often with extensive areas of open land related to aviation activity. Airfields form part of the national transport infrastructure. Changes in technology will require aerodromes to adapt and change over time.”*

The DfT GA Strategy and associated research has highlighted the value of General Aviation to the UK economy as in excess of £3 billion. It directly supports over 10,000 jobs and indirectly a further 30,000. There are also additional benefits to associated industries such as tourism. Maintaining access to a national network of general aviation airfields is vital to the continuing success of the general aviation industry and the provision of a viable nationwide transport infrastructure, as well as providing access to aviation for sport and leisure. It is noteworthy that ninety-six per cent of city pairs served by general and business aviation have no scheduled flight connections. Other specific features of this aerodrome network related to national planning strategy are:

- The aerodrome network supports multiple roles: emergency and medical services, business travel, pilot training for future airline recruitment, and open spaces for social and leisure activities.
- Proposals that include the whole curtilage of aerodromes within ‘brownfield definition’ and associated guidelines fail, despite guidelines, to ensure adequate scope of scrutiny required within the local planning process when national policies and interests arise.
- The curtilage of many airfields is now being recognised as an important ‘open green space’ by many Local Planning Authorities and there is increasing evidence from local nature and environmental surveys that airfields are increasingly important as a low-insecticide, low-herbicide, sanctuary for plants, insects and associated wildlife.
- It should also be noted that different aspects of General Aviation operate from different types of aerodromes and airports. For example, a larger regional airport may host business jets, but often do not encourage light aircraft or flying training. Smaller aerodromes, which cannot handle larger business aircraft, therefore remain equally important not only in terms of regional connectivity, but also in terms of local amenity, because they offer a greater diversity of aviation activity including flying training and access to sport aviation. There is also a practical need in pilot training for a hierarchical airfield network to enable new pilots to be properly trained in different airfield environments, as well as allowing progressive training from basic to more complex and sophisticated aircraft.

There is genuine concern within the industry that the national network of airfields, providing an important tenet of transport infrastructure, is under threat. A July 2015, a Parliamentary Petition was initiated highlighting *“the role that airfields play both as an important part of our national transport infrastructure and as an important yet often overlooked environmental green space”*. The petition gained over 10,000 signatories in its first 72 hours.

The sizes and areas involved with airfields, along with the social, environmental and economic features, merit special attention in an overarching planning perspective. The greater recognition of this does not preclude development. It merely ensures proper scrutiny preventing inappropriate redevelopment with due consideration of value. This principle applies to other strategic national infrastructure interests such as ports, docks and harbours, railway stations and motorway service stations. The same should be applied to airfields. We therefore hope that these sensible and measured

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additions to the NPPF will be incorporated, in order to better allow General Aviation to support science, technology, engineering and mathematics (STEM) jobs and growth in the UK in the future.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Roger Hopkinson', with a long horizontal flourish extending to the right.

Eur Ing Roger Hopkinson MBE
Facilitator: General Aviation Alliance