

# GENERAL AVIATION ALLIANCE

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Partnership in Aviation

President: Air Chief Marshal (Rtd) Sir John Allison  
Vice President: Lord Robin Rotherwick

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## **ATTENTION: Alex Lessware**

Dear Mr Lessware,

### **CONSULTATION PAPER ON NEW PLANNING POLICY STATEMENT 3: HOUSING**

Although you published PPS3 for comment by the planning and building sectors, it contains a proposal which would have a significant effect on aviation throughout the UK and on which the GA Alliance wishes to comment. The GA Alliance is a group of organisations representing, as far as possible, all UK General Aviation (GA), and Sports and Recreational Aviation interests (S&RA). The Alliance coordinates about 72,000 subscription paying members of these bodies. It is estimated that in total more than 100,000 people are involved in GA. This covers parachuting, hang gliding, gliding, sport and recreational flying in light and microlight aircraft and helicopters. Its objective is to co-operate and consult with government departments and other relevant organisations to support and progress these interests. Our principle interaction with government is through DfT and through EASA to the EU. We were surprised that UK aviation was not specifically consulted on this element of PPS3. The important change, hidden as it is in a footnote to an annex could easily have passed unnoticed.

PPS3 Annex A includes a change to the definition of curtilage in relation to a brownfield site which could have the effect of closing the majority of sport and recreational airfields and other landing sites in across UK. Whereas PPG3 Annex C clearly defined the open areas of airfields and hospitals as greenfield, PPS3 now includes them with the built areas as brownfield, making them a priority for development. Small airfields and landing areas do not generate a large income from sport and recreational flying and the prospect of development with the consequent increase in land value, will force

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*British Gliding Association  
British Hang Gliding and Para Gliding Association  
British Microlight Aircraft Association  
British Parachute Association  
Royal Aero Club of the United Kingdom*

*General Aviation Safety Council  
Helicopter Club of Great Britain  
Popular Flying Association  
European Association of Instrument Rated Pilots*

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owners to close their operations. There will be no business case to do otherwise. The larger commercial airports should be unaffected by this change as their land values will already be high, although pressure groups who want to stop airport expansion may be able to use this change to their advantage.

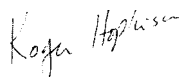
The small airfields and landing areas that concern us are generally situated in a rural environment. Many are all grass and even those with hard runways are predominantly grass areas with modest buildings. Some are the base for flying clubs and training, many may be home to only one or two aircraft. Sites used for gliding may be just a large grassed field with very few buildings. All these places support sport and recreational aviation including parachuting, gliding, microlight and light aircraft airports. The capacity of these facilities is already limited and closures will have damaging effects on all aspects of UK aviation, not only the area of sport and recreational flying, gliding, parachuting and so on. Many of our commercial and airline pilots and engineers started their training at these small airfields and that will no longer be possible. Aircraft displaced from small airfields are unlikely to find alternative accommodation in the UK so we must protect what airfields currently exist.

We suspect that the policy has been redrafted with the regeneration of derelict airfields and other derelict sites in mind; we support that. However, the effect of the change would be to focus development for housing in many completely rural areas where small landing sites have been established in the last 50 years. Even where airfields currently exist in semi-urban areas, they tend to be on the fringe and provide an important green open space for sport and leisure.

We wish to object to the proposed change to the definition of curtilage in PPS3 Annex A on the grounds that this will result in the closure of sporting and recreational facilities across the UK. We wish to see the current definition in PPG3 Annex 3 retained.

This matter will also be of concern to the DfT, The CAA and Sport England who may be unaware of the impact of your proposals. We note that this change appears to be in conflict with Sport England Policy Objective 24. We believe you should obtain the views of these organisations on this issue.

Yours Sincerely



Roger Hopkinson  
**Facilitator GA Alliance**