



House of Commons, London, SW1A 0AA

Chair: Steve Double MP | President: Sir Roger Gale MP | Co-Chair: Lord Davies of Gower

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

25 August 2020

Dear Secretary of State,

Planning for the Future: Airfields

I write to you with regard to the recent proposals published by MHCLG for reform of the planning system. 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.

The UK's prosperous General Aviation Sector contributed £3.3Bn to the UK economy in 2015, more recently this has been estimated at over twice that level by industry experts. It is a vital element of the UK's transport infrastructure, helping to support our world class commercial aviation and aerospace industry as it provides an important entry point for the pilots and engineers of tomorrow. Accordingly, General Aviation Airfields are therefore critical sites 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. This includes promoting the provision of aviation infrastructure. However, the current consultation document is unclear as to how GA airfields would be protected under the new proposals. It is therefore essential that further guidance on the status of GA airfields is set out by MHCLG to avoid local authorities, particularly where Local Plan policies are not compliant with the NPPF, inappropriately placing them in the wrong zone.

In most cases, the APPG-GA considers the 'Renewal' Zone to be most appropriate for established GA airfields. This would give certainty to the airfield owners and operators that developments 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.

Kindly sponsored by



As an alternative, and given the Paper's regular references, it may be more appropriate to create a fourth zoning category: 'Infrastructure'. We believe that there are 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.

GA airfields 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 benefits for the local economy of the area around an airfield. Some examples of these challenges are set out below to elaborate on the need for a clear policy steer.

- 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 wholesale redevelopment (despite planning guidance caveats) – this has created uncertainty, deterred investment and led, in some cases, to long planning battles. Zoning would 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 (both licensed and unlicensed) need 'safeguarding'. This is a system devised originally for major airports to minimise the risk of harm to aircraft on 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 when it comes to the protection and upgrading of its airfields. There is plenty of demand for flying sites and only a limited supply to meet it. The vast majority of today's airfields were built to meet the needs of the Second World War, and have survived a 70 year process of both natural (and unnatural) selection, unlike Europe very few new airfields have been built since 1945. The reality is that once they disappear, they are invariably gone forever. If any further airfields are lost from the remaining network, it will seriously undermine the ability of the General Aviation industry to continue in the UK.

The age of electric flight is dawning, as the European Aviation Safety Authority (EASA) approved the first all-electric training aircraft widespread usage earlier this year. This sea change in operability and pricing is likely to have a major impact on demand while putting 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.

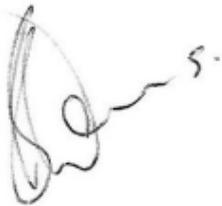
Kindly sponsored by



The APPG-GA is very willing to work with MHCLG to get this right. Organisations involved with the APPG-GA are also working with the Department of Transport on the definition of a national network of strategically important GA Airfields which will include those sites where zoning is necessary and appropriate.

I would appreciate a response on the points of concern raised in this letter to enable me to brief members of the APPG-GA on the measures being considered by your department to protect the country's vital network of GA airfields.

Yours ever,



Lord Davies of Gower

CC – The Rt Hon Grant Shapps MP – Secretary of State for Transport
Kelly Tollhurst MP – Minister for Aviation

Kindly sponsored by

