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6 October 2015



Dear Ms Wass

Novus Environmental, Novus House, Thriplow, Royston, SG8 7RR
Ref: S/0008/15/CW.

I refer to your letter dated 16 September 2015 regarding the above planning application. I am writing to register our objections to the proposed development.

We have grave concerns that allowing the current proposals to go ahead will not only put the sustainability of our airfield operations at risk but that, consequentially, it will negatively impact on the museum as an important visitor and heritage attraction, the important aerial vistas and our numerous onsite partners and their businesses. The continued operation of the airfield as a live and dynamic business is vital to making IWM Duxford unique.

There has been an operating airfield at Duxford since its completion by the RAF in 1918, and we are already in preparation to help celebrate its centenary in 2018 highlighting its importance not only regionally but nationally and internationally. Given our unique position and heritage IWM Duxford is popular with the general aviation community as well as the wider visiting public.

Our offer currently supports over 30- 40 on-site partners, 600 plus volunteers, 250 employees and 300,000 visitors (and growing per annum); which in turn generates over £30m per annum within the local economy; and we have ambitions to grow with the support of local partners.

IWM Duxford is of national and international importance. It is a branch of Imperial War Museums (IWM), a national museum with a national remit; indeed we have recently welcomed over 40,000 visitors to our recent Battle of Britain Anniversary air show weekend. IWM Duxford is a charging branch in that it charges an entrance fee for visitors. We know from recent research that one of the key reasons that visitors choose to come to IWM Duxford is the chance and ability to see aircraft in flight as well as on display. The key remit of IWM, as a whole, is learning and access and IWM Duxford has a long established, strong and vibrant educational programme. IWM Duxford is currently the number one visitor attraction in the East of England according to Trip-Advisor, playing a vital part in the diversification of the local economy, and helping attract visitors to other regional attractions and businesses.

As well as being a museum of national importance it is also home to a large number of third-party complementary businesses and organisations including conservation services, archive storage and management, historic aircraft flying partners and three regimental museums.

Over the past two decades, IWM has invested in excess of £40m in capital development of the site and welcomed circa eight million visitors. IWM Duxford works with stakeholder organisations including South Cambridgeshire District Council (SCDC), local Parish Councils, as well as education and skills providers, the Heritage Lottery Fund (HLF), Historic England and other cultural organisations and societies.

Duxford Airfield/Aerodrome

IWM purchased the airfield from Cambridgeshire County Council in 2009 to help secure the future and sustainability of both the airfield and the museum. IWM now own and operate the airfield/aerodrome, which is integral to the operation of the museum and the public offer. This airfield is licensed for 365 days per year and is the base for the largest collection of flying historic military aircraft in Europe – welcoming over approximately 5,000 visiting aircraft in addition to those based here at IWM Duxford; and seeing over 28,000 ‘movements’ (landings) per year. This number was and is seen to grow significantly however these proposals will put this at risk. These aircraft are a unique historic collection; a significant and increasing part of the nation’s aviation heritage and an essential part of the dynamic mix of interpretative exhibitions, active conservation work and flying aircraft for which IWM Duxford is world famous. In order to ensure early consultation of proposed local development, IWM Duxford has lodged a revised Aerodrome Safeguarding Map (see attached¹) with South Cambridgeshire District Council as its primary local planning authority. This is in line with *‘DfT/ODPM Circular 1/2003 - advice to local planning authorities on safeguarding aerodromes and military explosives storage areas’* which states:

‘Operators of licensed aerodromes which are not officially safeguarded, and operators of unlicensed aerodromes and sites for other aviation activities (for example gliding or parachuting) should take steps to protect their locations from the effects of possible adverse development by establishing an agreed consultation procedure between themselves and the local planning authority or authorities. One method, recommended by the Civil Aviation Authority to aerodrome licensees, is to lodge a non-official safeguarding map with the local planning authority or authorities.’

IWM Duxford airfield is in regular use by aircraft of all types throughout the year. At times, particularly on air show days of which there are six per annum, the site is used intensively by aircraft of varying ages, type and size. Importantly, IWM Duxford is becoming the centre of excellence in restoring and flying vintage aircraft (particularly second world war aircraft) – with many partners focused at supporting this. Any infringement, or increased risk, risks those partners relocating and deciding to make different medium to longer-term investment decisions.

The proposed development site lies 1,000m out from our touchdown point on runway 06. The height of our touchdown point is 125' above mean sea level (AMSL). The height of the land at the crematorium is 120' AMSL. The 3 degree glide path passes over the top of this structure at 170' giving a clearance of 100'. This poses a safety risk, particularly during days of poor visibility or flying into the low lying sun. It should be noted that this is the clearance given for the actual glide path and not the cone that surrounds it (see attached glidepath diagram ²). This is particularly relevant for IWM Duxford given the age of the aircraft flown here, and the inherent level of sophistication of the instruments as compared to modern aircraft.

The structure is completely inside the inner cordon of our Safeguarding Zone and its height threatens the safety of arriving aircraft in inclement or marginal weather. In addition, air shows at IWM Duxford frequently contain displays of current, fast military jet aircraft that have a pre-determined, predominantly fixed route. The chimney would be a collision hazard. In the future, if IWM Duxford were to move to an Instrument Flight Rules (IFR) recovery capability, or future legislation were to require licensed airfields to operate under IFR, all IWM Duxford air traffic would over-fly the proposed development at low level.

As you will be aware, the tragedy at Shoreham also had some direct impacts in terms of the running of air shows and there may be further guidance and instruction once the final findings of the investigation into the accident has been published. The CAA has asked us to consider the option to utilise our airspace to the West where the impact of traffic and built up areas is less onerous.

I note from the Non-Technical summary document that 'the new plant also requires a chimney that will be 25m high.' This is in contrast to the last paragraph of the Environmental Statement, by the same author, that:

'The final means of ensuring the effect from emissions will have an insignificant impact is the height of the chimney. The taller the chimney the more the gasses are dispersed on the wind and therefore the less impact they will have on ground level. The chimney height at 25m is guaranteed to ensure very good quality dispersion. The computer models used to confirm this always use worse case scenarios and assume the plant operates at the emission limit maximum for 100% of the time. This robust and proven method will ensure that the plant cannot have a significant adverse impact.'

We believe that there is another chimney of some 15 metres in height, and though not ideal, is manageable with the correct briefing and advice given to visiting pilots. Introducing a subsequent chimney, more than 10 metres higher, introduces an unacceptable risk in our opinion.

Commercial

In addition to the dynamism created for our visitors by the presence of a working runway, IWM Duxford is host to a number of businesses which also rely on the continuity and safety of such a facility. Through this partnership working, IWM Duxford contributes some £30m+ per annum to the local and regional economy.

DCLG Planning Practice Guidance (paragraph: 012 Reference ID: 54-012- 'Transport evidence bases in plan making and decision taking' states that:

Aviation makes a significant contribution to economic growth across the country, including in relation to small and medium sized airports and airfields (aerodromes). An aerodrome will form part of a larger network. Local planning authorities should have regard to the extent to which an aerodrome contributes to connectivity outside the authority's own boundaries, working together with other authorities and Local Enterprise Partnerships as required by the National Planning Policy Framework. As well as the National Planning Policy Framework, local planning authorities should have regard to the Aviation Policy Framework, which sets out Government policy to allow aviation to continue making a significant contribution.

In addition, the Aviation Policy Framework (2013) considers the aviation sector as a major contributor to the local economy. In its section on maintaining a viable network of business and general aviation (186-191) it is noted that:

'the network of aerodromes of varying sizes, from airports in Northern Ireland, Scotland, Wales and regional airports in England to small business and general aviation (GA) airfields into which GA aircraft can readily gain access. While almost all of these are privately owned and operated, maintaining access to such a national network is vital to the continuing success of the sector.'

Any development which curtails our existing, lawful and unfettered aerodrome use would have serious commercial consequences for the museum, and its on-site flying partners, and may jeopardise the sustainability of the IWM Duxford in the long term and create a threat to a significant heritage asset in the eastern region. This is contrary to Policy CS34 (Protecting Surrounding Uses) of the *Cambridgeshire and Peterborough Minerals and Waste Development Plan* published in July 2011 which states clearly that waste management development will only be permitted where there would be no significant harm to existing land uses, visual intrusion or other amenities.

Comments to the proposed development in relation to the museum, the Conservation Area and its setting

The museum site is in a bowl with the land rising to the south and north. Important historic views to the open countryside beyond are afforded and the view across the airstrip to the south is said to be similar to the views attained from the site in the 1930s prior to the main fighter pens and other dispersal buildings being erected. The character of the landscape setting and the importance of the trees and other landscape features in and around the site forms part of its historic qualities.

In this, the period of the First World War Centenary, it should be noted that IWM consider its Duxford site to be the largest First World War exhibit in its collection. This includes not only the buildings and their immediate setting but the surrounding vista and heritage landscape. The museum site is acclaimed as the 'finest and best preserved example of a fighter base representative of the period up to 1945 in Britain' (Source: English Heritage).

Our airfield is still in constant use, which is not the case on many other former RAF sites where open land has been colonised by new development. In recognition of the site's significant historical merit South Cambridgeshire District Council designated the whole of the museum site as a Conservation Area in 2007 and recognises the importance of protecting its heritage setting in both the existing (Policy CH/11) and the proposed Local Plan. Paragraph 8.24 of the draft Local Plan states:

'Given its national significance, the District Council will give IWMD special consideration within the context of protecting the quality of the surrounding landscape in this sensitive site on the edge of the Cambridge Green Belt.'

Additionally, policy NH/2: *Protecting and Enhancing Landscape Character* in the same draft Local Plan states that development will only be permitted where it respects and retains, or enhances the local character and distinctiveness of the local landscape and of the individual National Character Area in which it is located. These principles are also reflected in policy CS33 (Protection of Landscape Character) of the *Cambridgeshire and Peterborough Minerals and Waste Development Plan* published in July 2011. We do not believe that the proposed increase in building size and the size of the chimney, as you approach the Conservation Area either from the air or on the ground, can be considered an enhancement of such an important and historic site.

I note that you drew the Conservation Area to the attention of the applicant in your pre-application advice letter dated 19 February 2015 and that Duxford Airfield was only 1km away to the north east (although this information was removed from your letter dated 3 March 2015 relating to the screening application). I am grateful to see that the Visual Impact Assessment document acknowledges the historic importance of this site and that the Conservation Area has been considered. Whilst I understand that the author of the report believes that the 'neither the site nor the chimney is visible when entering or leaving the Conservation Area' it is silent on the issue of the approach to the Conservation along surrounding roads or from the air. In addition there is the possible visibility of the chimney from our Control Tower which, of course, has an inherent elevated position over the airfield and is itself an historic building. I am unable to ascertain this with any certainty from the photographs provided but we believe and are very concerned that this could be detrimental to the historic vista and landscape and in direct opposition to draft policy NH/2.

Planning application comments

We have seen the pre-application advice dated 19 February 2015 and note that you advised the applicant to contact IWM to discuss the height of the chimney and any increase in emissions. For the record, the applicant did not contact us until June 2015. The Statement of Community Involvement the Applicants Planning Statement currently states:

Imperial War Museum Duxford

'As recommended the IWM at Duxford was contacted and discussions have been had with the Head of Airfield Operations. They clearly expressed concern over the height of the chimney; they confirmed that the site falls within their safety zone and would want to be formally consulted when the application is

submitted. We also discussed the angle of the flight path and again IWM expressed concern that their flight path safety was not impinged upon. We have responded to these concerns in the Planning Statement....'

registered

There has only recently, since the application has been submitted, been an approach by the agent to engage in a meaningful dialogue. A meeting was held on 5 October 2015 with the applicant and their agent, Mr Wayne Taylor; Head of Airfield Services, Mrs Alison Inglis; Head of Projects, Cllr Mick Martin from SCDC and myself.

IWM Duxford was neither invited to nor informed of the three previous local meetings to discuss this application. The Statement of Community involvement document sets out the methodology for publicising the proposals to local residents and Parish Council via the open days. At no time was IWM approached to attend even though the meetings were in the month after the applicant had made contact with us. It is also noted that CCC were in attendance at these meetings and the communication plan presumably agreed with you. Whilst I appreciate, from your letter to Ms Heidi Allen MP dated 16 September 2015, that it is the applicant's responsibility to engage with the community, we had lodged an aerodrome safeguarding map, albeit with SCDC, and thus we were relying on the planning system to ensure that that we would be brought into the development consultation process at an early point by CCC or SCDC.

Therefore and for the sake of clarity we make the comments below on the content of the planning application:

a) In relation to Air Traffic Safety, the Applicant's Planning Statement currently states:

It is our understanding, after having consulted with an air safety engineer, that the minimum flight angle a plane can approach an airfield is 3° above the horizontal from the closest point of the runway. Having assessed the height of the chimney and calculated the angle as 1.7° to the top of the chimney from the closest point on the runway it would appear that a 25m high chimney in the proposed location would not constitute a significant hazard to air traffic....'

Our (IWM's) response to this is: That whilst the chimney does "...not constitute a significant hazard with regard to modern aircraft..." it does create a hazard, nonetheless and a specific risk to historic aircraft. A pilot recovering to the airfield in bad weather, whilst attempting to adhere to the ideal approach path, may still deviate under duress (due to the meteorological conditions) and drift down towards the lower edges of the approach cone and clip any obstacle i.e. the chimney.

To emphasise the point made above we have seen, as a result of the unfortunate incident at Shoreham, that the Civil Aviation Authority is constantly reviewing and tightening up on its guidance and specifications; and along with IWM treats safety as being paramount.

At the meeting on 5 October 2015 meeting, the implication of the positioning of the chimney relevant to the runways was highlighted, using map diagrams, as the proposal is exactly on the centreline and only 1km away. There was also much discussion on the

thermal heat signature of the exhaust gases blowing downstream towards aircraft taking off (at their most vulnerable in relation to their engine) which could engulf them with hot/very warm air and which has the potential to rob the aircraft of significant power margins.

It was noted that IWM Duxford was not chosen, and modelled, as a site for pollution monitoring receptor. The Local Air Quality Management Technical Guidance published in 2009 which states, in section 1.29:

The Regulations make clear that likely exceedances of the objectives should be assessed in relation to *"the quality of the air at locations which are situated outside of buildings or other natural or man-made structures, above or below ground, and where members of the public are regularly present"*

We are concerned, therefore, that that there are unknown pollution effects on the health of the IWM Duxford staff, partners, volunteers and visitors together with unknown detriment on our environment.

The applicant has agreed to:

- Ask their consulting engineers if the chimney height can be lowered without impacting on human health and ground level concentrations and, if so, would CCC and the EA agree that this is possible.
- Ask if a 'thermal image' of the effect of the heat from the chimney can be produced for wind speeds under 10 knots.
- Ask their air quality engineers to confirm why the IWM was left out of the critical receptor list in their report.

b) All of the drawings / photographs provide an incomplete and we believe present a misleading picture as they exclude the proximity of the airfield.

c) We also note on page 18 of the Planning Statement, in the section entitled 'Air Traffic Safety', that there is a reference to policy CS40 Airport Safeguarding in the *Cambridgeshire and Peterborough Minerals and Waste Development Plan* published in July 2011. Our reading of this policy is in relation to bird strike for officially safeguarded aerodromes and the sentence missing from the quotation in the Planning Statement is 'The preparation and implementation of an approved Bird Management Plan may be required.' Our concern is not related to bird strike but to hazards to air traffic from the development proposed.

The General Aviation Awareness Council published the *'General Aviation Sector-Led Guidance On Planning In Relation To Aerodromes For Local Planning Authorities, Aerodrome Owners And Aerodrome Operators'* in January 2015³. It was issued to all relevant local authorities and provides an informative explanation for planning authorities and other interested parties with regard to the complexities of operating an airfield and the planning decisions which can affect one. I attach another copy for your information as this sets out many of the concerns experienced by ourselves and many other smaller airfields regarding development proposals and airfield protection.

In summary, IWM Duxford is Europe's premier aviation museum, is a world leader in aviation heritage conservation and hosts more air show days than anywhere else in Europe. Aircraft have been operating from Duxford airfield since 1918 and it is IWM's clear intention to continue to do so in as an unrestricted manner as possible in the future.

The presence and continuation of the current operation of IWM in the east of England, as part of our national heritage, is a significant benefit as a living, breathing dynamic museum; regional tourist attraction, world-class centre for the conservation and operation of historic aircraft, educational establishment and employer. The contribution to both the local economy and the tourist profile of the eastern region has been created by a large number of both public and private partnerships built up over the past three decades.

We wish to continue to grow and be part of the East of England's and the United Kingdom's success story, but we need support and some protection to enable us and our partners to achieve this. Simply, the current proposal puts this all at risk.

It would be unacceptable if our flying operations were curtailed or prevented, our function, as a national museum, was in any way obstructed or our historic setting compromised in any way. We will always make a robust challenge to any proposed development that created a risk to our existing, lawful and unfettered aerodrome use.

Should you require any further information or wish to visit the airfield please do not hesitate to contact me.

Yours sincerely



Graeme Etheridge
(Interim) Executive Director

CC.

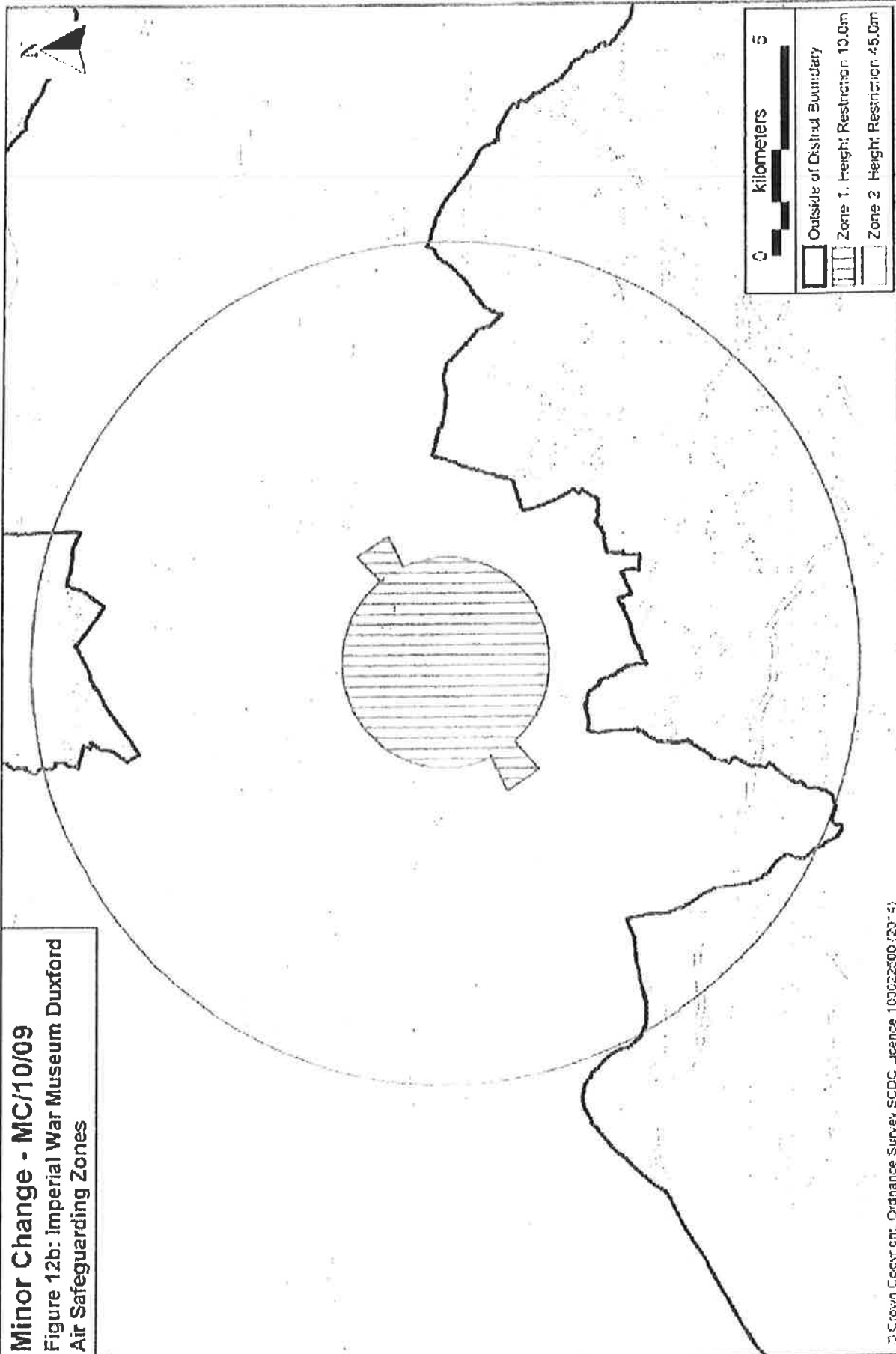
Heidi Allen, MP
Councillor Peter Topping, CCC
Councillor Mick Martin, SCDC
Jean Hunter, Chief Executive, South Cambridgeshire District Council
Thriplow Parish Council
Duxford Parish Council
Whittlesford Parish Council
Ickleton Parish Council

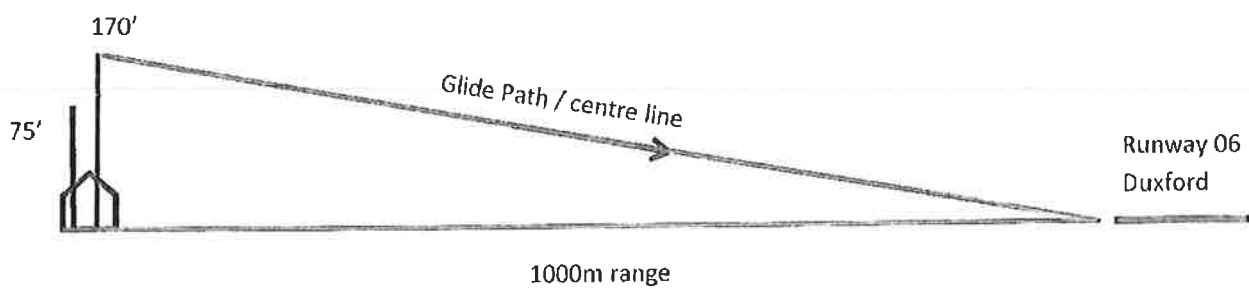
Encs:

1. Aerodrome Safeguarding map lodged with SCDC
2. IWM Duxford Aerodrome glide path diagram.
3. General Aviation Awareness Council '*General Aviation Sector-Led Guidance On Planning In Relation To Aerodromes For Local Planning Authorities, Aerodrome Owners And Aerodrome Operators*' (January 2015).

Minor Change - MC/10/09

**Figure 12b: Imperial War Museum Duxford
Air Safeguarding Zones**







The General Aviation Awareness Council

President: The Lord Rotherwick

April 2015

GENERAL AVIATION SECTOR-LED GUIDANCE ON PLANNING IN RELATION TO AERODROMES FOR LOCAL PLANNING AUTHORITIES, AERODROME OWNERS AND AERODROME OPERATORS.

INTRODUCTION.

This document has been prepared by the General Aviation Awareness Council (GAAC) in response to a Government request for industry-agreed advice to assist decision makers in taking proportionate and appropriate account of the potential contribution of aerodromes both to the national economy and local communities. It also contains advice to aerodrome owners and managers to support them in understanding the protections and limitations of planning processes from their point of view.

The GAAC is a national body supported by over 60 organisations representing all areas of the general and light aviation movement, with a cumulative membership totalling over 40,000 people. It therefore has industry-wide authority to speak on matters related to airfields, take-off and landing sites used by its members.

The UK GA fleet is estimated to exceed 27,000 aircraft. These aircraft are flown by more than 32,000 pilots. When, on 22 March 2013, the Government published its Aviation Policy Framework (APF) it noted:

"The business and general aviation (GA) [sector] is important to the UK. The sector delivers vital services, including search and rescue, mail delivery, life-saving (organ) transport, law enforcement, aerial survey and environmental protection flights, as well as underpinning the training of future pilots, ground-based aircraft engineers and technicians. The sector also covers a wide range of activities, from corporate business jets and commercial helicopter operations through to recreational flying in small private aircraft, including gliders.

Research by York Aviation on the economic contribution of General Aviation was commissioned by the Government and published in March 2015. The research suggests that the total economic footprint of UK based GA activity in 2013 is some £3 billion, supporting over 38,000 jobs, 9,700 directly related to flying and the remainder to manufacturing. In Gross Value Added terms, this total includes;

- an economic footprint from GA flying operations of £1.1 billion;
- the export component of GA manufacturing of around £1.1 billion;
- additional wider benefits deriving from the use of business aviation of at least £0.8 billion.

There are also additional benefits to associated industries such as tourism.

However this research also indicates that while business aviation and air taxis have experienced growth in movements of around 7% since 2005, there has been a significant decline in aero club and private flying in this period. While there are some signs that this market is recovering from the recession, if GA flying operations could be reinvigorated to levels similar to those of 2005 then the economic value of the sector could increase to some £1.8 billion. Local authorities should be aware of these findings and of the contribution that general aviation can make to regional economies.

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 business aviation have no scheduled connection.

It should also be noted that different aspects of General Aviation operate from different types of aerodromes and airports. For example, at a larger regional airport a business jet may be regarded as a typical GA aircraft and often such regional airports 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.

Despite this clear importance, a number of airfields have closed and others have been recently threatened as a result of owners seeking to release the value of their land and local planning authorities giving priority to housing and other development. The General Aviation Challenge Panel Report of May 2014 stated: "... local government and councils (for fiscal and housing delivery reasons) generally do not consider the potential economic value of aviation or unlicensed aerodromes. ... "

It is important to properly assess the role of an aerodrome as part of a strategic network of aerodromes supporting General Aviation as a vital and sustainable part of the country's business and transportation infrastructure. This guidance document highlights areas of pressure and suggests how planners and aerodrome operators can help protect and develop a strategic network of aerodromes needed to support a potentially vibrant UK GA sector.

(It should be noted that, for the sake of simplicity, the terms airfield, aerodrome and flying site in this document, can be assumed to have the same meaning; flying sites smaller than international or regional airports, that support non-scheduled, general aviation operations.)

SUMMARY OF KEY AREAS AND RECOMMENDATIONS

1. CONNECTIVITY. THE NEED FOR A NATIONAL GA AIRFIELD INFRASTRUCTURE

(see also detail paragraphs 1-8)

A network of GA aerodromes around the UK, provides vital connectivity for business travellers and acts as an important and cost-sustainable part of the national transport infrastructure. Despite this, many are threatened as a result of owners seeking to release the value of their land and local planning authorities prioritising housing and other development on the land they occupy.

DCLG Planning Practice Guidance, (paragraph: 012 Reference ID: 54-012-20150313 at <http://planningguidance.planningportal.gov.uk/blog/guidance/transport-evidence-bases-in-plan-making/transport-evidence-bases-in-plan-making-guidance/>) recognises that aerodromes can confer connectivity benefits of more than local significance. Each site forms part of a larger national network and piecemeal closure without reference to their value as part of a strategic network can have far-reaching consequences.

2. BROWNFIELD SITE STATUS.

(See also detail paragraphs 9-17)

The potential for aerodrome sites to be used for housing became more feasible following the deletion in 2003 of the footnote in PPG13, noting that airfields and hospital grounds should not be considered brownfield sites. The new definition of previously developed land included in the Glossary (Annex 2) of the NPPF makes no specific reference to airfields or flying sites. This has resulted in an increasing tendency for local planning authorities to treat airfields as brownfield sites for land redevelopment.

Local Planning Authorities should be aware of the environmental credentials of the undeveloped areas of airfield sites and that GA flying sites could be considered as appropriate under NPPF allowance for the provision of "local transport infrastructure which can demonstrate a requirement for a Green Belt location".

3. AIRFIELDS AND RENEWABLE ENERGY	<i>(See also detail paragraphs 18-29)</i>
<p>Inappropriate applications for wind turbines in proximity to aerodromes, often inside safeguarded areas forcing objections on safety grounds, represent a significant cost and time issue for airfield operators. The cumulative effect of large numbers of unassociated wind turbine or solar array developments in a specific area can also make such concerns more acute.</p> <p>The NPPF directs decision makers to the Overarching National Policy Statement for Energy Infrastructure (EN-1) which, at paragraph 5.4.2 states: <i>"It is essential that the safety of UK aerodromes, aircraft and airspace is not adversely affected by new energy infrastructure."</i></p> <p>Local Planning Authorities and aerodrome operators should work closely to understand the potential impact of renewable energy developments on aerodromes so that planners are aware of the risks to airfields and general aviation that such developments create and know which airfields in their areas could be affected and would need to be warned of any incoming application.</p>	
4. NOISE	<i>(See also detail paragraphs 30-32)</i>
<p>There is widespread concern that the introduction of new noise sensitive development (such as housing) in close proximity to long-established noise generating sites (such as flying sites) may in future force the latter to alter their operations or even close down due to new (and foreseen) complaints.</p> <p>Planners need to be aware of the extent to which certain levels of noise may be unavoidable consequences of maintaining levels of commercial activity at aerodromes and that this may constrain options for nearby developments.</p>	
5. SAFEGUARDING AND THE PLANNING PROCESS	<i>(See also detail paragraphs 33-39)</i>
<p>There is a statutory obligation for Local Planning Authorities to refer planning applications in the vicinity of an aerodrome for CAA assessment for only 27 of the largest civilian aerodromes. All other civilian flying sites rely on voluntary or unofficial safeguarding. The response to this from local planning authorities has not always been consistent.</p> <p>Local Planning Authorities and aerodrome operators should work closely to understand the potential impact of local developments near to aerodromes so that planners are aware of the risks to airfields and general aviation that such developments create and know which airfields in their areas could be affected and should be warned of any incoming application. Authorities should hold safeguarding maps and develop safeguarding procedures with operators wherever appropriate.</p>	
6. AIRFIELD VIABILITY, CLOSURES AND ASSET DISPOSAL	<i>(Detail paragraphs 40-48)</i>
<p>For the promotion of local jobs and growth it is important to secure the on-going future and potential of GA aerodromes as a local and national resource. Planning authorities should be alert to the extent to which the rapid removal and sale of assets at an aerodrome could adversely affect the potential for bringing it back into operation.</p> <p>Government guidance now reminds planning authorities that a working or former aerodrome could be put forward for consideration proposed as a site for mixed use development (NPPF paragraph 17) that includes continuing, adapting or restoring aviation services in addition to other uses.</p> <p>Government guidance also requires planning authorities to have regard to the extent to which an aerodrome contributes to connectivity outside the authority's own boundaries, working together with other authorities and Local Enterprise Partnerships as required by the National Planning Policy Framework.</p> <p>Any change of use from its role as an airfield should only be permitted after the planning authority has fully considered the extent to which the aerodrome has contributed to connectivity outside its own boundaries. In addition options should be explored such as mixed use development, allowing aviation to be continued, developed or adapted alongside other land uses.</p> <p>Planning authorities should consider encouraging owners of airports who intend that there should be a final closure and cessation of business to complete full and proper consultation, operate a cooling off or review period in which demolition, asset sale or other disposal of key airport equipment do not take place.</p>	

CONCLUSION

Despite the inevitable pressures from alternative requirements for land use and other commercial factors, General Aviation airfield operators have proved resilient, adaptable and self-sustaining in, largely without subsidy, maintaining an important element of transportation infrastructure. Maintaining access to a national network of general aviation airfields is vital to the continuing success of both the general aviation industry and the provision of a viable nationwide business, leisure and transport resource.

Pressures on land uses are high and the industry has long accepted the need to be proactive in engaging with local planners and the local community, to identify and promote the value of the activities undertaken on their sites, as well as mitigating environmental impacts. However it is clear that many Local Planning Authorities do not fully recognise the General Aviation sector's importance to either their local community or wider national prosperity.

Aviation is a dynamic sector of Britain's social and economic base, but for the industry to continue to play its role it requires both the safeguarding of the current aerodrome infrastructure and, via the proactive involvement of Local Planning Authorities in line with National Policy Planning Framework, the creation of long-term confidence to unlock investment to create growth in activity, with attractive and modern facilities for its users.

General Aviation Awareness Council
April 2015

NOTES:

Additional more detailed information on each of these key areas is attached in a following appendix.

Further information or advice is available on request from:

Stephen Slater
Vice-Chairman
General Aviation Awareness Council.

planning@gaac.org.uk



The General Aviation Awareness Council

President: The Lord Rotherwick

SECTOR-LED AIRFIELD PLANNING GUIDANCE IN MORE DETAIL:

CONNECTIVITY: THE NEED FOR A NATIONAL GA AIRFIELD INFRASTRUCTURE

1. While Commercial Air Transport or airline operations are focussed on scheduled flights from 25 airports around the UK, GAAC research indicates that GA in the UK uses more than 120 aerodromes licensed by the Civil Aviation Authority for non-scheduled passenger carrying use and between 350 and 500 unlicensed flying sites. These can range from former military aerodromes with mile-long runways, to smaller airfields with grass runways and privately owned 'farm strips' and helipads. Almost all these airfields are privately owned and operated, gain no subsidy and directly contribute to their local communities in rates and the generation of salaries.
2. This network of GA aerodromes around the UK provides vital connectivity for business travellers and acts as an important part of the national transport infrastructure, providing economic benefit to the country as a whole, providing 'point to point' access, allowing passengers and cargoes to be delivered closer to their ultimate destination, saving time and cost. They also provide important infrastructure and support for activities such as police and pollution patrols, medical flights, aerial surveys and civil search and rescue operations. Many flights are also made by private individuals who fly their own aircraft or a hired aircraft to these aerodromes for business or social purposes.
3. Despite protection in the National Planning Policy Framework (paragraph 33) and the Government Aviation Policy Framework, a number of airfields have closed and others have been threatened as a result of owners seeking to release the value of their land and local planning authorities prioritising housing and other development on the land they occupy.
4. In addition the refusal of planning permissions for the updating of essential aerodrome facilities, or the imposition of unreasonably restrictive limitations on acceptable uses can act as a potential blockage to ancillary development necessary to provide future financial viability.
5. Disruption of this national network of smaller, local airfields by piecemeal closure without reference to their value as part of a strategic network can have far-reaching consequences. A recent temporary closure of Blackpool airport in late 2014, had known effects on regular aircraft movements as far afield as Buckinghamshire, Gloucestershire, Hampshire and Oxfordshire as, without a convenient destination for planned business and social flights to the Fylde area, the flights were merely cancelled, with those involved being forced to resort to less efficient, more time-consuming alternative means of travel.
6. DCLG Planning Practice Guidance (paragraph: 012 Reference ID: 54-012-20150313 at <http://planningguidance.planningportal.gov.uk/blog/guidance/transport-evidence-bases-in-plan-making/transport-evidence-bases-in-plan-making-guidance/>) recognises that aerodromes can confer connectivity benefits of more than local significance. Each site forms part of a larger national network and piecemeal closure without reference to their value as part of a strategic network can have far-reaching consequences.
7. The Government's March 2015 General Aviation Strategy notes that opposition to aerodrome development is often high within local communities, especially where the potential benefits of a GA airfield to the area may be poorly understood, while the potential adverse effects such as noise are

publicised and more readily appreciated. The recent GA research recommends that the Government should continue to encourage planning authorities to ensure that they take into account in their Local Plans and in all planning decisions the economic and employment roles the local airfields play.

8. Local Planning Authorities need to work collaboratively, especially as GA is not a "local" issue and each site forms part of a larger national network. Planning strategically across local boundaries is reflected in paragraphs 178 to 181 of the NPPF (and the Localism Act), although the emphasis there is on strategic priorities.

BROWNFIELD SITE STATUS.

9. Possibly the single biggest threat to GA aerodromes in UK today has been developers' interest in aerodromes as potential housing locations and pressure on aerodrome owners to sell up. The past year has seen an acceleration of the already worrying trend of aerodromes closing or coming under threat. One factor has been the deletion in 2003 of the footnote in PPG13, noting that airfields and hospital grounds should not be considered brownfield sites.
10. The original PPG statement had excluded airfields from consideration and an assurance was given at the time to GAAC President, Lord Rotherwick by Baroness Andrews and in the lower house by Yvette Cooper, that this 'oversight' would be remedied. It has however been overtaken by the new planning system, with the result that local planning authorities now treat airfields as brownfield sites.
11. While PPG13 has now been superseded by the NPPF, the GA Challenge Panel's 2013 report stated that: *"... the allocation of these unlicensed sites as brown field, and their inclusion in the strategic housing land availability policy means that when applications for re-development are submitted to the local planning authority there is no planning policy to support their retention."*
12. The new definition of previously developed land included in the Glossary (Annex 2) of the NPPF makes no specific reference to airfields or flying site, but states: *"Land which is or was occupied by a permanent structure, including the curtilage of the developed land (although it should not be assumed that the whole of the curtilage should be developed) and any associated infrastructure"*
13. It is noteworthy that the curtilage of many airfields is 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.
14. Future developments at airfields are also pressurised by the application of Green Belt policy without full consideration of the openness of the greater part of an aerodrome site. York Aviation in their research published in March 2015 noted that they were aware of many GA aerodromes that have experienced protracted difficulties with the planning system, with local planning authorities according little or no weight to the need for modernisation, followed by lengthy and costly appeal processes often with a negative outcome. This presents a high regulatory burden for smaller aerodromes, which are often small businesses operating on small profit margins.
15. For example, Elvington Airfield near York was refused planning permission on appeal for hangar development necessary to sustain on-going aviation activity due to concerns about the interaction with a nearby Special Protection Area (SPA) and Redhill Aerodrome in Surrey has been refused permission, on the grounds largely of in principle harm to the Green Belt, for an all-weather runway that was necessary to enable it to handle more modern aircraft, without which its long term viability is at risk. This risk was not considered sufficient to constitute very special circumstances sufficient to overcome Green Belt objections.

16. Other airfield locations, such as at Bourn in Cambridgeshire, Kemble in Gloucestershire and Wellesbourne near Stratford-upon-Avon, are threatened by future potential changes of use of their sites for housing development and the consequent loss of the aerodromes.
17. Local Planning Authorities should be aware of the environmental credentials of the undeveloped areas of airfield sites and should be aware that GA flying sites could be considered appropriate under NPPF allowance for the provision of "local transport infrastructure which can demonstrate a requirement for a Green Belt location"..

AIRFIELDS AND RENEWABLE ENERGY

18. Given the heavy emphasis on sustainable development, which is at the core of the National Planning Policy Framework, it is inevitable that there is a policy presumption in favour of all forms of renewable energy. A footnote 17 at page 23 of the NPPF specifically directs decision makers to the Overarching National Policy Statement for Energy Infrastructure (EN-1) which, at paragraph 5.4.2 states: *"It is essential that the safety of UK aerodromes, aircraft and airspace is not adversely affected by new energy infrastructure."*
19. While in all cases, the consideration and approval of the windfarm application is a matter for the relevant Local Planning Authority, the Civil Aviation Authority has produced detailed guidance covering the issue of aviation and windfarms in its CAP 764 document. This covers both the statutorily protected sites as well as those regarded as non-statutory.
20. This is a valid and important consideration, as a number of developers have made inappropriate applications for wind turbines in close proximity to aerodromes, often inside safeguarded areas.
21. In addition to the obvious risk of collision, there are other safety factors involved such as the risk of distraction, blade-light flicker and the risk of downwind vortex turbulence from the fast-moving turbine blade tips, which according to industry-agreed research, may extend downwind for up to 16 times the diameter of the turbine blades. For larger airfields, potential disruption of radar coverage by blade interference is also a significant issue.
22. Statutorily-protected sites: Large airports, NATS and the MoD are given statutory protection from development. Therefore any developer must consult them and ensure that they are content for the proposed development to proceed.
23. Non-statutorily protected sites: For smaller airports and aerodromes, there is no statutory safeguarding. However, Section 3.2 of CAP 764 states:
24. *"Those aerodromes and CNS sites that are not safeguarded by statutory process can be unofficially safeguarded by agreeing protection measures with their Local Planning Authority."*(See also section 5 of this document; *Safeguarding and the Planning Process*).
25. Sections 1.10 and 1.11 of CAP 764 state: *"Operators of licensed aerodromes which are not officially safeguarded and operators of unlicensed aerodromes and sites for other aviation activities (for example, gliding or parachuting) should take steps to protect their locations from the effects of possible adverse development by establishing an agreed consultation procedure between themselves and the local planning authority or authorities. Local planning authorities are asked to respond sympathetically to requests for non-official safeguarding."*
26. *"The safeguarding of unlicensed aerodromes is therefore a matter of discussion between the operator and the Local Planning Authority and the need for constructive liaison from an early stage is evident."*

27. Objecting to inappropriate development represents a significant cost and time issue for airfield operators. There is also some evidence that owners and operators of aerodromes are not always advised that an application has been made and, as a result, have missed out on the opportunity to comment.
28. Recent requests to develop solar power arrays on and near aerodromes may also potentially affect airfield safety by their erosion of safe landing areas in cases of emergency. As with wind turbines, there are concerns that the cumulative effect of large numbers of unassociated developments may make such concerns even more acute.
29. Local planning authorities and aerodrome operators should work closely to understand that potential impact of renewable energy developments on aerodromes so that planners are aware of the risks to airfields and general aviation that such developments create and know what airfields in their areas could be affected and would not to be warned of any incoming application.

NOISE

30. Housing land allocation is driving development in areas of ever closer proximity to airfield boundaries. While existing safeguarding rules adequately regulate safety issues such as vertical intrusion and safety zones, there is an increasing concern that the introduction of new noise sensitive development (such as housing) in close proximity to long-established noise generating sites (such as flying sites) may in future force the latter to alter their operations or even close down due to new (and foreseen) complaints.
31. Previous planning advice has traditionally been focused primarily upon the introduction of a noise-generating activity upon existing development. The NPPF has partially addressed this with a bullet point in paragraph 123, which states that: *"Planning policies and decisions should aim to: Recognise that development will often create some noise and existing businesses wanting to develop in continuance of their business should not have unreasonable restrictions put on them because of changes in nearby land uses since they were established."*
32. Planners need to be aware of the extent to which certain levels of noise may be unavoidable consequences of maintaining levels of commercial activity at aerodromes and that this may constrain options for nearby developments.

SAFEGUARDING AND THE PLANNING PROCESS

33. The safeguarding process is a key mechanism for dialogue between local planning authorities, aerodrome operators and the Civil Aviation Authority. This is enshrined in CAA document CAP 738 *Safeguarding of Aerodromes*.
34. There is a statutory obligation for LPAs to refer planning applications in the vicinity of an aerodrome for CAA assessment for military flying sites and only 27 of the largest civilian aerodromes. For the remainder, the CAA advises that the LPA should give due consideration to the expertise of the aerodrome operator. This is in line with government policy (ODPM circular 1/2003 (and Scottish Executive Planning Circular 2/2003))
35. The lodging of voluntary safeguarding information with relevant local planning authorities is mandatory for operators of flying sites licensed for the carriage of paid passengers (CAA CAP168, Licensed Aerodromes) and guidelines for operations at unlicensed flying sites (CAA CAP 793, Safety at Unlicensed Aerodromes) recommends that voluntary or unofficial safeguarding agreements are made with the appropriate LPAs.

36. Safeguarding in planning law means to safeguard an established land use. In reference to aviation it is achieved by a process of checking proposed developments so as to:

- Protect the blocks of air through which aircraft fly, by preventing penetration of surfaces created to identify their lower limits.
- Avoid any increase in the risk to aircraft of a birdstrike by preventing development such as rubbish tips which may increase hazardous bird species in the vicinity of an airfield.
- Protect the integrity of radar and other electronic aids to air navigation, by preventing reflections of the radio signals involved.
- Protect visual aids, such as approach and runway lighting, by preventing them from being obscured, or prevent the installation of other lights which could be confused for them.

37. It is noteworthy that the response from local planning authorities is not consistent. Sometimes authorities resist accepting unofficial safeguarding. For example an application was rejected for a safeguarding zone around an aerodrome in the south-west of England, the council instead offering a "constraint maps" agreement, and other local authorities have also resisted becoming involved due to the perceived bureaucracy required.

38. Even if a local authority accepts a safeguarding map, experience demonstrates they don't always adhere to it and they do not necessarily notify the aerodrome operator of applications for development. For example Denham Aerodrome's owners discovered in 2008, that during an office move its local council had lost the safeguarding maps that had been deposited with them. A further recent case was a failure to consult with an aerodrome operator, only highlighted when a County Council shortlisted a site close to the end of a runway for a waste incineration plant with a tall chimney.

39. Local planning authorities and aerodrome operators should work more closely to help planning authorities better understand the potential impact of local developments near to aerodromes so that planners are aware of the risks to airfields and general aviation that such developments create, and to know what airfields are in their areas.

AIRFIELD VIABILITY, CLOSURE, ASSET-DISPOSAL

40. Despite the inevitable pressures from alternative requirements for land use and other commercial factors, General Aviation airfield operators have proved resilient, adaptable and self-sustaining in, largely without subsidy, maintaining an important element of transportation infrastructure. The recent York Aviation report for the DfT focuses on the financial, social and economic benefits that GA airfields bring to the country and on suggestions of means of developing this further.

41. It is important that the planning sector helps rather than hinders this development process, by ensuring that proposed changes of use do not negatively affect the viability of the aerodrome operation, and that proposed necessary developments are enabled to secure the on-going future and potential of the aerodrome as a local and national resource.

42. Recent closures followed by the rapid dismantling of infrastructure at airports including Manston International, Sheffield Business Airport and Plymouth have highlighted these concerns. In contrast, when airport management companies at Coventry, Exeter and Blackpool were respectively forced to cease operations on financial grounds, a more proactive approach has allowed each of these airfields to reopen under new management and continue to serve their respective communities.

43. In the event of an aerodrome's closure, there is a statutory requirement (s35 of the Civil Aviation Act 1982) that currently applies to a CAA-designated aerodrome (compulsory safeguarding) that the person having the management of the aerodrome shall provide *"adequate facilities for consultation with respect to any matter concerning the management or administration of the aerodrome which affects the interests"* of:
- i. *users of the aerodrome;*
 - ii. *any local authority in whose area the aerodrome is situated; and*
 - iii. *any other organisation representing the interests of persons concerned with the locality in which the aerodrome is situated."*
44. Guidance published for Airport Consultative Committees in April 2014 states that the Government recommends representation of these statutory consultees through a consultative committee formed for this purpose. However this guidance does not specifically mention consulting on the closure of an airport or airfield.
45. Planning authorities should be alert to the extent to which the rapid removal and sale of assets at an aerodrome could adversely affect the potential for bringing it back into operation. Government guidance now reminds planning authorities that a working or former aerodrome could be put forward for consideration proposed as a site for mixed use development (NPPF paragraph 17) that includes continuing, adapting or restoring aviation services in addition to other uses.
46. Government guidance also requires planning authorities to have regard to the extent to which an aerodrome contributes to connectivity outside the authority's own boundaries, working together with other authorities and Local Enterprise Partnerships as required by the National Planning Policy Framework.
47. Any change of use from its role as an airfield should only be permitted after the planning authority has fully considered the extent to which the aerodrome has contributed to connectivity outside its own boundaries. In addition options should be explored such as mixed use development, allowing aviation to be continued, developed or adapted alongside other land uses.
48. Planning authorities should consider encouraging owners of airports who intend that there should be a final closure and cessation of business to complete full and proper consultation, and implement a cooling off or review period in which demolition, asset sale or other disposal of key airport equipment does not take place.

ENDS

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