

Uttlesford District Council
Local Plan Examination Statement July 2019
Examination Matter: Andrewsfield and Current Planning Guidance over
Airfields

I have previously made representations on the Uttlesford District Council
Local Plan.

This Statement does not aim to repeat my original representations. It:

- a. Updates the planning policy support for the retention of General Aviation (GA) airfields;
- b. Responds to the Inspectors' questions over Andrewsfield Airfield
- c. Provides further recommendations for amendment of Policy with the aim of retaining aviation at Andrewsfield

The original representations remain valid in all respects, and I would particularly draw attention to the detail about the valuable aviation role that Andrewsfield Airfield plays in the UK and in the South East of England in particular.

Planning Policy Context

Since my previous representations in 2018 & 2017, I am now aware that the planning policy support for GA airfields has been significantly enhanced by Government. The revised NPPF (July 2018) now contains specific policy guidance for their protection.

New paragraph 104 in the NPPF reads:

'Planning policies should....

(f) recognise the importance of maintaining a national network of general aviation airfields, and their need 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.'

This is an important change. It means:

- For the first time, general aviation airfields have a status in the planning process.
- The reference to 'Planning policies', places a requirement on planning authorities to consider the future of any GA airfields in their plan making activities.

- The reference to '*adapt and change*' recognises the changing role of GA airfields.
- The cross reference to the Government's General Aviation Strategy specifically requires this document to be a consideration in the planning process.
- As this wording is in the section of the NPPF 'Promoting sustainable transport' it gives recognition to the role of GA as a part of the wider network of transport infrastructure in England and Wales.

My previous representation explained the reasons why Andrewsfield is of strategic importance within a national airfield network. Under the new provisions of the 2018 NPPF the Airfield should therefore be explicitly identified and protected in appropriate Policy.

I understand and appreciate from the UDC Planning Office that this Examination is proceeding on the basis that the provisions of the NPPF 2012 apply (and that this is of particular relevance in respect of housing allocations) However, that does not detract from the lack of detailed consideration of the general aviation role of Andrewsfield Airfield and its potential future contribution.

The recent changes to the NPPF are the continuation of a strengthening of policy in respect of general aviation airfields going back to the General Aviation Strategy of March 2015. The NPPF articulates the planning implications of this policy development but the principles to be taken into account are set out in the Strategy, including a specific commitment by the Government to amend planning guidance in the way that has now been done.

The Inspectors' Questions : Policy SP8 - West of Braintree Garden Community- The Inspectors have raised following relevant questions:-

4. Should the plan identify specific allocation / areas within the policy area for employment use?
6. Will this development result in the loss of a pilot training school and if so will a replacement site need to be found in order for this part of the site to be developed?
7. How have any impacts from flight paths to and from Stansted Airport on the West of Braintree proposed garden community been considered?

Andrewsfield Aviation is a long established source of employment in provision of flight training and is one of the premier schools in the UK with a national award winning Chief Flying Instructor. The school trains both private and commercial pilots and is currently running at capacity for training due to the demand for pilots.

Collectively across the site from the Flying School to the Millibar Cafe and Engineering firm MK Aero Support there are 9 full time employees and 40 part-time staff. Importantly both Andrewsfield Aviation and MK Aero Support are examples of business that offer self improvers the opportunity to start an aviation career as a pilot, operations officer, air traffic controller or as an aircraft engineer. This supports the Government Policy to encourage STEM skills (Science, Technical, Engineering and Mathematics) with young people. Furthermore an Aviation Training College has now been established at Stansted with relevant training courses for careers in all supporting sectors of the aviation industry. It is important we retain local access to basic training facilities at smaller airfields that are unconstrained by commercial operations.

In relation to flight paths there is significant potential for increased large aircraft noise and pollution if Andrewsfield closes. The airfield airspace is protected for a radius of 2 nm from the centre of the airfield and up to 2000' above ground by an Aircraft Traffic Zone. If the airfield is closed and the ATZ is removed large aircraft flying out of Stansted will be able to fly lower. In the NW quadrant the Stansted Airspace will change from 2000' above ground to ground level. In the SE and E sectors it will reduce from 2000' to 1714 feet above ground. Air Traffic Services are increasingly using advanced technology to facilitate more direct routing and approaches into major airports like Stansted to facilitate efficiency. Andrewsfield being just on the edge of the airspace acts as a buffer zone.

The General Aviation Awareness Council has highlighted rapidly developing technologies in the aviation and aerospace sectors. The Government's Green Paper 'Aviation 2050 The future of UK aviation' seeks to encourage innovation and new technology. It is critical to the future of aviation that sites are available in key strategic locations which are suited to providing for the requirements of emerging new technologies. The Green Paper highlights automation, electrification, digitalisation and data sharing and the need to make provision for future developments. Sites such as Andrewsfield are essential to providing locations for these developments. As an example we now have fully electric aircraft being used for Ab Initio pilot training in the SE of England with charging being provided via solar energy on the airfield. However we need to maintain a network for the entire industry to operate with support for this new evolving technology. The UK has led the world in Aviation and we need to establish a path for the future technology boom in this area.

Therefore, to secure the continuation of aviation use at this strategically important airfield, it is considered that a specific policy commitment should be made.

Andrewsfield Airfield has been considered as 'previously developed' land although it is essentially a greenfield site used mainly for agriculture purposes with the exception of the airfield's aviation activities.

The NPPF defines this:

‘Previously developed land: *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 fixed surface infrastructure. This excludes: land that is or was last occupied by agricultural or forestry buildings; land that has been developed for minerals extraction or waste disposal by landfill, where provision for restoration has been made through development management procedures; land in built-up areas such as residential gardens, parks, recreation grounds and allotments; and land that was previously developed but where the remains of the permanent structure or fixed surface structure have blended into the landscape.’*

I wish to draw attention to the caveat and the list of exclusions from the definition. Airfields were specifically referred to in the original PPG3 and there is ongoing discussion about whether they should be classed as ‘previously developed land’. In 2015 a petition was submitted to the UK Government headed ‘Keep Airfields Greenfields’. While the Government response to this stated that airfields are regarded as brownfield land it then specifically reiterates that ‘...it should not be assumed the whole of the curtilage of a brownfield site should be developed.’ This is enclosed at Appendix 1.

In addition, we draw attention to the NPPF definition of general aviation airfields which again highlights the ‘extensive areas of open land’.

‘General aviation airfields: *Licensed or unlicensed aerodromes with hard or grass runways, often with extensive areas of open land related to aviation activity.’*

These factors I feel have not been taken into account by the UDC Local Plan.

In addition, no justification has been put forward for this quantum of residential development and this proposal does not take account of the aviation and related constraints on the site. Furthermore UDC has not demonstrated that these constraints can be adequately addressed without harm to the heritage assets and existing activities on the site.

It has also not been demonstrated how a ‘Garden Community’ would function in this part of the Council’s area or how such a development would be integrated with its surroundings. It also appears not to have considered the limited capacity of the existing road network consisting mainly of unlisted and B-roads.

It is clear an assessment of the Andrewsfield Airfield site has not been undertaken by Uttlesford DC and it appears much of the information is from assessments submitted by the developers who disregard the Airfield completely. From a recent helpful communication with the UDC Planning

Department I was informed the assumption is that the Airfield will be extinguished by the Local Plan.

In the absence of any detailed appraisal of the site, it is not possible to demonstrate the soundness of this assumed proposed policy. I do not feel this is justified as the most appropriate strategy as the decisions taken are not based on proportionate evidence. Although the land may be in private ownership the airfield came into existence as a result of wartime activities and has been a fully CAA licensed airfield with planning permission given via UDC since 1974. The Local Plan process I feel should take account of this long established situation with the major detrimental impact the loss of the Airfield would present from lack of a pilot training facility.

I would like to recommend that part of Policy SP8 includes a statement:-

Within the existing operational boundaries of Aerodrome, as defined on the policies map, planning permission will only be granted for:

- a. Development directly associated with existing flying activities or proposals for the improvement and diversification of aviation facilities and activities;*
- b. Development in the immediate surrounding local area to be undertaken only with the ability of the Airfield to continue in operation in a safe manner as per CAA safeguarding considerations, taking into account such matters of flight paths circuit patterns, and noise considerations in advance.*
- c. Development which would be likely to lead to a significant increase in road traffic movements or any significant adverse impact on the heritage assets of the site will be resisted.*

Appendix 1- Government Response to Clarification on Planning for Airfields

Appendix 2- Supplementary Evidence Supporting Representations in relation to Andrewsfield and WoB