

Gloucestershire Airport Operators Response to EXAM 29A-D

The operators I represented at the Matter 5 Hearing have assessed the content and I offer the following responses to the Inspector on their behalf.

CAA Engagement

The letter from the Civil Aviation Authority merely confirms that the Safety and Airspace Regulation Group of the Authority's involvement is 'passive' in relation to the business and planning aspects of local development plans. Their role is to oversee aviation safety and not to comment on the operational impact that the allocation of Airport land for non-aviation activities, irrespective of the potential impact on the Airport's operational viability in the long term.

In order to safeguard aviation activity at the airfield, operators must, therefore, rely on the Planning Authority to consider and implement the Government's General Aviation Strategy via the NPPF guidance.

The Inspector will, of course, be fully familiar with the guidance, reproduced below, but the operators are concerned that the Airport management and the planning authority has not fully appreciated the operational impact that the release of this land for non-aviation purposes and, particularly, the stated longer-term aim to implement the next phase of development on the northern side of the aerodrome has.

Specifically, Paragraph 104 of the NPPF, under the section heading 'Promoting sustainable transport', states:

'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.'

It was noteworthy during the hearing that the officer dealing with the recent application confirmed that he had advised the Airport to reduce the scale of the initial application in the light of the strong objections received.

This, perhaps, recognises the July 2019 Ministry of Housing, Communities and Local Government new planning practice guidance, which has applied the Agent of Change Principle, as set out in NPPF paragraph 182, to airfields. This enhances the protection to be given to existing airfields, stating:

'Planning policies and decisions should ensure that new development can be integrated effectively with existing businesses and community facilities (such as places of worship, pubs, music venues and sports clubs). Existing businesses and facilities should not have unreasonable restrictions placed on them as a result of development permitted after they were established. Where the operation of an existing business or community facility could have a significant adverse effect on new development (including changes of use) in its vicinity, the applicant (or 'agent of change') should be required to provide suitable mitigation before the development has been completed.

Nevertheless, when pressed, both he and the Airport confirmed that the longer term aim remains to allocate this land for employment use and develop the north side, closing off access and egress for helicopter operations.

The operators are in no doubt that this will significantly restrict capacity at the Airport for both helicopter and fixed wing operations and reduce safety margins. As an aviation professional, with some 30 years' experience, I concur fully.

Business Plan and 'Appendment'

The key content and strategies referred to in the 2017 Business Plan provided by the Airport are familiar to me, albeit not in a format I recognise - I would have corrected the spelling, punctuation and grammar!

Infrastructural investment needs, including runway resurfacing and radar replacement were included. Significantly, the non-aviation property aspirations did not specify the extent of the north side development, referring to the release of some land at Meteor and Anson Business parks independently, which accords with my personal recollections of the strategy and, indeed, JCS submissions made at the time.

Whilst the brief 'appendment' document dated 2021 makes reference to the recent planning permission, it does not elaborate on the reasoning behind the significant change of property strategy nor does it detail any master planning associated with this, as requested by the Inspector.

Overall, the documentation provided does little to assuage the operators' concerns that this strategy has not been adequately considered by the Airport or the Planning Authority in respect of the operational impact and, therefore, harm that the release of this land will do to the Airport and associated businesses.

The concern remains that the Airport's current development strategy has been 'rushed through' to secure LEP grant funding, without consideration of the operational impacts and that the Planning Authority has used the 'opportunity' considered to exist to solve employment land allocation difficulties.

If I can be of any further assistance, or you require further information, please don't hesitate to contact me.

Yours sincerely

Darren Lewington