

House of Commons, London, SW1A 0AA

Chair: The Rt Hon Grant Shapps MP | Ambassador: Carol Vorderman, MBE RAFAC

The Rt Hon Chris Grayling MP
Secretary of State for Transport
Department for Transport
Great Minster House
33 Horseferry Road
London SW1P 4DR

15th October 2018

Dear Secretary of State,

Urgent Case for CAA Safeguarding of all Licensed Airfields

As you will recall, the All-Party Parliamentary Group on General Aviation (APPG-GA) strongly believes that the Civil Aviation Authority (CAA) should become a statutory consultee and 'safeguard' all licensed and certified airfields.

Currently, all licensed airfields are required to safeguard themselves, but only some under statute. We, as a group of 174 aviation-minded parliamentarians, believe that the public will be surprised to learn that the vast majority of licensed and certified airfields in the UK do not benefit from this common-sense approach to basic aviation safety¹.

Safeguarding is achieved by controlling the use of land to protect those aspects of an aerodrome that allow it to operate safely: the approaches to, and departure from, runways; unrestricted viability of the aerodrome environs and positioning of appropriate navigational aids for both location and movements.

This relatively modest step would pass to the CAA the role of statutory consultee when plans are submitted that might impact on flight safety in the vicinity of an airfield.

A recent decision by Worthing & Adur District Council to grant outline consent to two developments at Shoreham, clearly demonstrates why the current situation – stretching back virtually unchanged to 2002 – is in urgent need of your attention and reform.

The applicant's adviser's initial report, and advice given to us by an independent adviser, show that the outline planning approvals given on 3rd October 2018 for a site on the north east corner of the airfield and New Monks Farm² are very likely to restrict the future viability of one of the busiest General Aviation airfields in the country. The construction of taller buildings to the north east is identified as an additional landing

¹ <https://www.gov.uk/government/publications/safeguarding-aerodromes-technical-sites-and-military-explosives-storage-areas/the-town-and-country-planning-safeguarded-aerodromes-technical-sites-and-military-explosives-storage-areas-direction-2002#annexe-2-arrangements-for-safeguarding-aerodromes-technical-sites-and-military-explosives-storage-areas-international-and-national-aviation-background>

² <https://planning.adur-worthing.gov.uk/online-applications/applicationDetails.do?activeTab=dates&keyVal=ORUFT5CB04U00>

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hazard. The larger residential scheme to the west of the airfield is positioned so close to the existing helicopter circuit that those living in the proposed dwellings will be subject to helicopter noise on a daily basis and face the additional risk of enforced/accidental landings, something both parties should ideally want to avoid.

Brighton International Airport (Shoreham) is a licensed aerodrome which, according to the CAA, was the 18th busiest in the UK in terms of aircraft movements during 2016³, and claims it is currently looking to host more international air travel. Despite this, Shoreham is apparently not classed as being of sufficient importance for the CAA to step in.

Of the 28 National and International airports officially safeguarded in England, only 11 were busier than Shoreham last year⁴.

Yet incredibly, this decision, which would locate a significant development to the west and north east of the main 02/20 runway, involved minimal consultation with the CAA and no independent technical evidence. An independent impact assessment was not provided, and no evidence was submitted by the CAA in response to requests by the aerodrome users. This led the planning authority to ignore proper consideration of independent technical evidence demonstrating the adverse impact of the development on airfield operations. Most importantly, little if any, prior consultation took place with those who use, and operate from, the airfield.

The APPG considers that this clearly indicates an urgent need for the CAA's safeguarding obligations to be reconsidered. Ideally, we believe that – in return for being an officially licensed airfield – the CAA should undertake to help develop a safeguarding plan with every licensed airfield. The CAA should also be a statutory consultee whenever a planning application is made that could impact on the operation of a licensed airfield and flight safety.

As a minimum, we propose that all licensed airfields should be required to have a CAA-approved safeguarding plan as a condition of their license and place an obligation on the owner/operator to lodge it with Local Planning Authorities (LPAs) and maintain a liaison.

The revised NPPF published in July requires LPA's to recognise and protect airfields and this change needs to be implemented, initially through a recommendation then by a specific requirement, that owners/operators of unlicensed airfields follow the advice in CAP 738 and submit a Safeguarding plan to their LPA.

We appreciate the Department for Transport is carrying out important reviews of aviation policy but, the delay in enacting these relatively simple changes leave our GA airfield infrastructure open to a continued battering by misinformed planning authorities, resulting in erratic and inconsistent planning decisions. Meanwhile, the irreplaceable damage to the General Aviation network, STEM-related jobs and technical training continues to harm Britain's economy as we prepare to exit the EU. Along with a large number of independently minded parliamentarians we are clear that urgent practical steps are now required in order to help ensure that the nation's relatively few remaining training airfields are far better protected.

Whilst we were delighted when your department begun to actively support the role of General Aviation – notably with the appointment of your General Aviation Champion, Byron Davies, time moves on, and no

³[https://www.caa.co.uk/uploadedFiles/CAA/Content/Standard Content/Data and analysis/Datasets/Airport stats/Airport data 2016 annual/Table 03 1 Aircraft Movements\(1\).pdf](https://www.caa.co.uk/uploadedFiles/CAA/Content/Standard Content/Data and analysis/Datasets/Airport stats/Airport data 2016 annual/Table 03 1 Aircraft Movements(1).pdf)

⁴[https://www.caa.co.uk/uploadedFiles/CAA/Content/Standard Content/Data and analysis/Datasets/Airport stats/Airport data 2017 annual/](https://www.caa.co.uk/uploadedFiles/CAA/Content/Standard Content/Data and analysis/Datasets/Airport stats/Airport data 2017 annual/Table 03 1 Aircraft Movements.pdf)

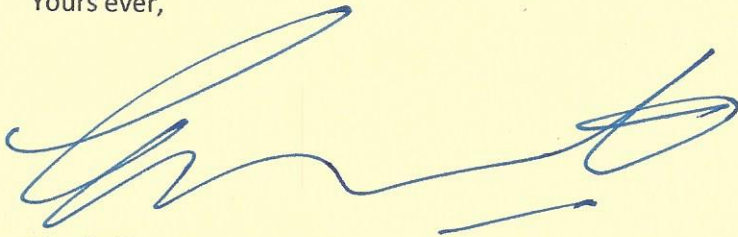
actual changes have been made by your department since we first met to discuss this crisis a year ago⁵. Meanwhile, each month sees further decisions which put the UK's airfield network at risk.

Once these airfields are gone, in many cases driven out of business by a sheer lack of aviation understanding during the planning process, they are virtually impossible to replace. We believe that the DfT should therefore urgently take the simple, but significant, step of tasking the CAA to safeguard the airfields they already license.

I would very much appreciate your thoughts to share with the cross-party parliamentary group and the wider aviation community.

I am copying this letter to the Ministry of Housing, Communities & Local Government Secretary of State, the Rt Hon James Brokenshire MP, and Aviation Minister, Baroness Sugg.

Yours ever,



The Rt Hon Grant Shapps MP

Chair of the All-Party Parliamentary Group on General Aviation

Whilst various reviews at DfT are welcome - the truth is that in the year since we started discussing these matters, decisions like that in Shoreham continue to degrade our nation's aviation training capacity. A few simple actions are urgently required and I hope we can make some rapid progress.

⁵ <http://www.generalaviationappg.uk/appg-for-general-aviation-meets-transport-secretary/>