



The General Aviation Awareness Council
President: The Lord Rotherwick

**RESPONSE TO 24/00347/HYBRID - Airfield and Land North Of Tollerton
Tollerton Lane Tollerton Nottinghamshire -**

OBJECTION

Dear Mr Taylor

On behalf of the GAAC, the UK's General Aviation Industry and Aviation Heritage UK we write to **Object** to this application for the reasons set out below.

In addition, while researching the background to this application we found the process by which the original Outline consent was granted did not include the appropriate consultation with airfield users and the General Aviation industry and this should be reviewed at the earliest opportunity.

Yours sincerely

JOHN GILDER MRICS FRAeS

ALLAN WINN FRAeS BE(Mech)

Vice Chairman
General Aviation Awareness Council

Chairman
Aviation Heritage UK
Vice-President Brooklands Museum

E: vice-chair@gaac.co.uk

allanwinn1@sky.com



**BROOKLANDS
MUSEUM**

April 2024

1. INTRODUCTION

1.1 The GAAC was formed over thirty years ago to work for the protection of UK airfields from indiscriminate development. It represents the interests of over 30 Associations, including the Aeroplane Owners & Pilots (AOPA), the Light Aircraft Association (LAA), the Honorable Company of Air Pilots (HCAP), the Aerodrome Operators Group (AOG), British Business & GA (BBGA), the Flying Farmers Association (FFA) the British Gliding Association (BGA), British Microlight Aircraft (BMAA) and the Association of Remotely Piloted Aircraft Systems (ARPAS), and comprises over 290,000 members involved in fixed wing, helicopter, Microlight, Balloon, Drone and Aeromodeller activities.

Wherever possible, the GAAC works in conjunction with complimentary organisations such as Sport England, the RSPB and CPRE. In January 2018 the All Party Parliamentary Group for Aviation formed five 'Working Groups' of specialists to advise on Airfields, Airspace, Tax & Regulation, Heritage and STEM. The GAAC provides half of the Airfields Working Group members including the Chair. It is intimately involved in shaping Government policy for the GA sector and liaises directly with Parliament and the Department for Transport.

1.2 Tollerton Airfield is a regionally, nationally and, increasingly, internationally significant infrastructure asset of acknowledged importance.

1.3 It is an important economic, educational and social asset for the District providing the communities of Rushcliffe, Nottinghamshire and the City of Nottingham with a vibrant and well-located recreation, business and leisure facility and bases for both emergency services and the Police while sustaining a diverse and significant ecological environment.

1.4 This Application makes little or no reference to aviation and engineering activities, merely referring to the demolition of aviation buildings. There is no mention of it hosting the emergency services or the various ancillary non aviation related activities. References to aviation appear to imply that the use is limited to a small number of owners whose aircraft are based on the site. In fact there are over 40 resident Aircraft and we understand current club memberships exceed 250 while the on site Engineering activities employ or occupy 76 skilled staff.

1.5 In relative terms the loss of this site would be far worse than the loss of a major playing field or area of open space. Airfields need size to provide sight lines for safe usage and these extensive areas of airfield land provide a level of flexibility that allows a wide range of outdoor activities while supporting a mature, healthy and biodiverse ecology that would take many years to replicate elsewhere.

1.6 This objection not only highlights the incorrect assumptions upon which the proposal is based, it also expresses concern at the way in which references to the Outline consent used to support the proposal are erroneous and misleading and the

shortcomings of the original consultation process, particularly consultation with the GAAC, which now represents over 290,000 members and other industry bodies. Wherever possible this document provides factual information about the activities at Airfield and sets out the planning policy considerations that should be fully factored into any decision to the detriment of General Aviation airfields.

2. This application needs to be considered in term of the Policies relating to airfields and the application of NPPF

- 2.1** The current Local Plan dates from 2014 and there is little evidence to show that it has gone through the required five yearly reviews. It therefore ignores much of the Government Policy for GA, which is set out in detail later in this objection.
- 2.2** The SHLAA Assessment of housing requirement for 2021- 26 identified a five year housing supply of 9.2 years see p17 (Ref: <https://www.rushcliffe.gov.uk/media/hm4pgayu/annual-local-plan-monitoring-report-2021-final.pdf>) The Rushcliffe Five Year Housing Land Supply Assessment published in December 2023 reported a figure of 8.3 years even excluding Gamston Fields and Tollerton for the period 2023 - 28.
- 2.3** There is no evidence to suggest that the Council has considered the loss of the airfield use due to its role in the airfield infrastructure network and this needs further investigation. Details of this policy are set out below.
- 2.4** No further investigation has been carried out and the Council has not assessed the value of the airfield activity. The comment same might be applied to any other established land use but rarely would forced closure be considered an appropriate planning action.
- 2.5** The site, comprising buildings and extensive areas of land is in active use as a General Aviation Airfield. The 'permanent' structures amount to a small percentage of the site area. The General Aviation Community draws attention to an unintentional error in definition of brownfield land between Planning Policy Guidance 3 and Planning Policy Statement 3, the original PPG 3 stated:
- '..where the footprint of a building only occupies a proportion of a site of which the remainder is open land (such as at an airfield or a hospital) the whole site should not normally be developed to the boundary of the curtilage. The local planning authority should make a judgment about site layout in this context, bearing in mind other planning considerations.'*
- 2.6** The definition of 'curtilage' in the NPPF differs for an airfield as normally the built form is a relatively small percentage of the site but the activities themselves require an extensive area to ensure good sight lines and make adequate safety provisions, both for aircraft and the general public.
- 2.7** It is also important to put into context the juxtaposition of 'brownfield' and 'previously developed land'.
- 2.08** It would not be appropriate for the site to be included on the Brownfield Land Register, as it would conflict with the provisions of the current Regulations. The proposed residential development would have an adverse impact on the ecology and natural environment of the site, would harm heritage assets (Ref Heritage England Report). The proposal would therefore conflict with The Town and Country Planning (Brownfield Land Register) Regulations 2017, Regulation 4 (2) as being a

'heritage asset' (d) and the provisions of Regulation 4 (2) which require the site to be *'suitable for residential development'* (d) (i) (bb) and (iii).

2.09 This representation constitutes a *'relevant representation'* under Regulation 4 (2) (b) (ii) of the The Town and Country Planning (Brownfield Land Register) Regulations 2017. Section 5 of this representation explains the strong policy context within which the retention of Tollerton Airfield for aviation use is essential.

2.10 Even if this site were to qualify to be regarded as 'brownfield', paragraph 123 of the NPPF makes clear that the principle of giving priority to 'brownfield' land does not apply if this would conflict with other policies in the Framework.

2.11 In the case of a strategically important General Aviation airfield, such as Tollerton, paragraph 110(f) clearly requires planning policies to:

'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.'

2.12 There is a long standing issue where some planning authorities assume it is appropriate to describe airfields as previously developed land or 'brownfield'. However, there are many GA airfields with planning policies giving them specific protection as their importance to their community is recognised.

3. Tollerton Airfield

Activities

- 3.1** This section sets out some of the key headline information about Tollerton Airfield. It is incomplete as we have not had the opportunity to gather all of the information we would normally include in an objection.
- 3.2** Tollerton's main runway 27/09 is 1,050 metres by 30m North/South runway 03/21 is 820 metres and offers an alternative in more northerly / southerly winds. Both are 'Hard' surfaces allowing all weather operations with a capacity to take larger GA aircraft particularly commuter and cargo services. This also makes it a viable alternative for surrounding airfields in case of emergency or bad weather.
- 3.3** Tollerton Airfield is occupied by 7 Companies directly employing 76 full and part-time staff. They offer services that include flying schools and aircraft maintenance. The Airfield Café (available to members of the public as well as people based at, or using, the airfield) employs mainly part-time staff.
- 3.4** It is a flight training centre with two flying schools and Swords Aviation.

Sherwood Aviation has trained pilots for over 50 years and is one of the oldest flight schools in the Midlands offering NPPL, PPL and CPL (Commercial Pilot) training with a mixed fleet of modern aircraft. It employs 15 staff.

Truman Aviation returned to Tollerton in 1963 and remains a flying school offering a similar range of qualifications. It currently employs 12 staff and is looking to expand.

Arcus is also a flying school and moved in from Leicester when it came under threat. It currently employs 7 staff.

Swords Aviation is a training school for pilots of veteran and vintage aircraft, that conducts dozens of STEM and aviation events for hundreds of young people each year including scouts, cadets, students, school pupils and children with learning difficulties.

CFS Aircraft Maintenance, is a CAA approved facility employing up to 10 skilled aircraft engineers. It relocated from Cranfield several years ago and is also looking to employ more as the aviation industry emerges from the Pandemic and resulting economic slump.

There are large areas for aircraft parking and extensive hangarage. Around 40 aircraft are based at the aerodrome and there is ample space for visitors.

- 3.5** Being able to accommodate these activities means that Tollerton constitutes a major Green Infrastructure Asset and this should be recognised and protected as such, for all residents of the District, the City of Nottingham and its many visitors.

- 3.6** In the near future, Tollerton is likely to form part of UK Government’s Future Flight initiative “Project Skyway”. Supported by the Government's Future Flight programme, the Skyway project is creating a ‘drone/UAV superhighway’ initially stretching between Reading and Coventry, and taking in cities including Oxford, Milton Keynes, Cambridge, and Rugby. The 165-mile airspace corridor will be the first to support fully automated drone flights beyond visual line-of-sight (BVLOS) from any qualifying drone company. It will be the first step in unlocking the full potential of unmanned aerial vehicles and be a catalyst to enable growth in the urban air mobility industry. The technology has been undergoing final testing, the results of which will be submitted to the Civil Aviation Authority (CAA) for review with approval for a commercial roll-out expected in late July 2024.
- 3.7** Key strategically located airfields, being early adopters of this technology, will then provide the core on which a new supply chain network spanning the entire UK will be established and grow. Airfields such as Tollerton will provide the backbone infrastructure for the new generation of airspace users, from providing essential facilities such as take-off and landing, charging, maintenance, storage etc. helping the local economy and driving the future of aviation.
- 3.8** Following earlier, unfinished, work by the Labour government around the Millennium, in 2004 the DfT and GAAC jointly funded a study by a Doctorate student at UCL to provide an academic and statistical assessment of the existing GA network. A change of government meant that this was not followed up at the time but in 2013 the Government committed to the policy of creating a Strategic Airfield Network (SAN) for General Aviation. In 2015 this was reinforced in its Policy document ‘General Aviation Strategy’ which laid down some of the criteria for a SAN with the intention of completing it before 2050.

Much work has subsequently been done to refine the criteria required including a recent survey by the Airfield Operators Group and the UK VFR Flight Guide of a large proportion of UK GA Airfields in order (*inter alia*) to define a Strategic Airfield Network (SAN). Tollerton has already been identified as an essential element of the SAN, due to its regional importance in the East Midlands

4. Planning Policy Relating to Tollerton Airfield

Key Principles of Government Strategy for General Aviation

- 4.1. NPPF paragraph 110(f) states '*Planning policies should....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*'

Key elements of this:

'*maintaining*' – i.e. retention and ongoing action to allow aerodromes to thrive

'*need to adapt and change*' – recognising both the need for ongoing investment to upgrade infrastructure and meet the needs of the constantly evolving world of aviation technology. In addition, diversification (whilst maintaining the core business and core activities can give economic support).

'*economic value*' – every medium sized GA aerodrome has an economic value. Within the strategic network, each contributes to the whole, in differing ways and to varying extent.

- 4.2 NPPF paragraph 96 states, '*Planning policies and decisions should aim to achieve healthy, inclusive and safe places which..... enable and support healthy lifestyles... for example through the provision of... sports facilities...*'

- 4.3 NPPF paragraph 88 (d) states, '*Planning policies and decisions should enable....the retention and development of accessible local services and community facilities, such as... sports venues, open space...*'

- 4.4 The relevance of paragraphs 88 and 96 are that Sport England recognises Flying, Aerobatic Flying, Aero model Flying, Ballooning, Gliding, Hang / Paragliding, Microlight, Parachuting and Popular Flying as Sporting Activities. Therefore these paragraphs seek, in principle, the retention and development of aerodromes where such activities take place and this is underlined by the provisions of paragraph 106 (now 110) which specifically focuses General Aviation.

Government Aviation Policy Statements

- 4.5 The Aviation Policy Framework (APF), 2013, is a formal statement of Government Policy, (Cm 8584). Paragraph 1.86 refers to the network of aerodromes and that '*... maintaining access to such a national network is **vital** to the continuing success of the sector.*' (My emphasis). Paragraph 1.87 refers to the importance of the transport role of GA aerodromes and their complementarity to the commercial air transport sector and connectivity they provide are particularly important for local businesses.

Paragraph 110 of the NPPF sits within Section 9, entitled 'Promoting sustainable transport', and so the role of GA aerodromes is not solely related to recreation but is also explicitly acknowledged as having a transport function.

- 4.6 Paragraph 1.12 of the APF emphasises the value of business and general aviation to the UK and summarises the '*vital services*' it delivers and, also its '**growing economic importance**' (our emphasis)
- 4.7 The context for the principle of maintaining a network of GA aerodromes is set out in the General Aviation Strategy 2015. Section 8 sets out issues in the planning system for general aviation accessible airfields. A key issue which emerged from the economic research into general aviation was the perception that low priority was being given to the strategic importance of general aviation aerodromes in the course of planning decisions and the potential for greater consideration to be given to these within planning policy in the future.
- 4.8 In respect of planning for new airfields, the General Aviation Strategy states that a new general aviation accessible airfield has not opened in the UK for many years, partly due to market conditions but also because of the difficulty of finding suitable sites. It also notes that this was at a time that a number of airfields had closed. This effectively refutes any suggestion that the operators on Tollerton Airfield might be able to move to an alternative location.
- 4.9 It goes on to explain that opposition to new airfields is recorded as often being high within local communities, especially where the potential benefits of a general aviation airfield to the area may be poorly understood and the potential adverse effects are publicised and more readily appreciated.
- 4.10 The Strategy also notes that improvements to infrastructure at airfields is key to their survival in an industry where technology changes very quickly, and existing general aviation airfields find it difficult to gain planning consent to develop their existing facilities. Economic research into general aviation recommended that the Government should continue to encourage planning authorities to ensure that they take the economic and employment role local airfields play into account in their Local Plans and in all planning decisions.
- 4.11 A Green Paper 'Aviation 2050' was issued in 2018 for consultation but has not progressed further due to Brexit and other major governmental issues. Section 7 is headed 'Support General Aviation' and states, '*The government aims to ensure that there are appropriate and proportionate policies in place to protect and support General Aviation (GA) and its contribution to GDP and jobs.*'
- 4.12 Looking to the future, paragraph 7.56 reflects the need to protect existing GA aerodromes:

'In the longer term, the GA sector will face further pressures from the growth of commercial aviation and on environmental issues; and challenges, as well as opportunities, from innovative and emerging technologies. The distinction between

model aircraft and drones is already becoming blurred but it is recognised the intent and operation of each is very different. The nature of personal air transport will change as air taxis and further technological innovation develops. If GA is to continue to encompass all types of non-scheduled civil flying, it will need to expand and embrace some fundamentally different types of flying and operations than those that it has traditionally encompassed.'

- 4.13** The 'General Aviation Roadmap' was published in April 2021 and re-emphasises the protection of GA infrastructure:

*'Government's focus on innovation and decarbonisation will require testing and trialling of new innovations in aviation technology and cleaner fuels. Airfields are **crucial** to ensuring that the impact of innovation across the Aviation sector is fully realised, and it is key that we protect, enhance and innovate GA infrastructure.'* (Our emphasis)

The Vision to protect airfields is developed:

'Supporting the strategic infrastructure network and assets of GA for activities today and to secure it for the next generation.'

Government action to support this is set out as:

- a. 'Launching the Airfield Development Advisory Fund to provide advice and support to help airfields thrive.'
- b. 'Supporting the establishment of the new CAA Airfield Advisory Team to provide advice and support to airfields.'
- c. The 'Roadmap' adds a further commitment to '*Developing planning guidance to protect airfields.*'

- 4.14** The Minister's statement in issuing the Roadmap on 27 April 2021 is a succinct summary of overall Government policy and aspiration which states:

'General Aviation (GA) is often referred to as the 'grassroots' of aviation and is the bedrock to our successful and world-leading aviation sector.

It's worth nearly £4 billion to the UK economy, supporting nearly 40,000 jobs. The hundreds of aerodromes up and down the country form an important part of the nation's transport infrastructure.

General Aviation provides the entry point for careers in aviation and is fundamental to inspiring the next generation of aviation professionals.

It supports vital services from law enforcement to life-saving airborne medical and search and rescue teams, and provides future pilots, engineers and other highly skilled professionals a first glimpse of a potential career in aviation.

Therefore, it is only right that the government's vision is for the UK to be the best place in the world for General Aviation as a flourishing, wealth-generating and job-producing sector of the economy. Our ambitions remain high and we have set out our priorities and how we can achieve these in the government's [General Aviation Roadmap](#), which I am pleased to announce. The roadmap sets out our vision and strategic priorities for the sector, alongside our ambitious programme of work that will help us to deliver this. We will work alongside the Civil Aviation Authority (CAA) and our GA stakeholders to achieve these ambitions.

I also wish to set out the government's view that it is clear from the success of our aviation sector there is a national need to protect and enhance our strategic network of GA airfields – to ensure they continue to prosper and drive the economic growth this country needs and to support leveling up right across the country. Airfields offer potential for highly skilled, dynamic and innovative businesses to grow and flourish – for manufacturing and maintenance of aircraft, aviation services, and for research and innovation.

At the heart of these efforts, we will work with airfields to strengthen their economic and strategic value both locally, regionally and nationally by supporting their development, and promoting mixed-use where there are benefits from offering their unique infrastructure to the wider community including for business, education, cultural and recreational activities. There are already several airfields within the UK, which share their infrastructure with a wide range of industries, as well as providing vital services to other government services. These airfields and many more are not just important to their local economies, but also critical to the success of the aviation sector.

General Aviation will also play a crucial part in our government's focus on innovation and decarbonisation. Trialling, testing and rolling out the next generation of zero emission technologies within General Aviation will support their development and pave the way for their wider adoption in larger commercial-scale operations – supporting decarbonisation of the wider sector and economy. This will help us reach our net zero target by 2050.

More widely, many aerodromes have been affiliated with operations during World Wars 1 and 2 and have since hosted heritage assets through the form of museums or have become designated historical sites. It is important these sites, which are so important to our heritage are able to thrive and grow to be enjoyed and appreciated by generations to come.

Our aviation heritage is rich, deep and rightly a source of great national pride. Looking forward, the government's vision is for the UK to be the best place in the world for General Aviation as a flourishing, wealth generating and job-producing sector of the economy.'

- 4.15** The Department for Transport published the 'General Aviation Handbook in 2023. In addition to summarising the Strategic Context for GA, as outlined above, it

focuses on the variety of GA operations, opportunities for GA in respect of:

- Decarbonisation and innovation test beds
- Education, diversity and inclusion
- Conservation opportunities
- Borders and migration; and
- Mixed/ shared use

All of those 'opportunities' are fully embraced by Tollerton

4.16 The handbook also sets out the 'Strategic value of GA airfields':

- Government services
- STEM/workforce opportunities
- Regional connectivity
- Innovation opportunities
- Professional aviation training

Tollerton contains all of these strategic qualities.

4.17 Government planning policy for GA aerodromes is set out above together with the intertwined recreation policy. But, the NPPF also protects open space. Paragraph 103 states:

'Existing open space, sports and recreational buildings and land, including playing fields, should not be built on unless:

- a) an assessment has been undertaken which has clearly shown the open space, buildings or land to be surplus to requirements; or
- b) the loss resulting from the proposed development would be replaced by equivalent or better provision in terms of quantity and quality in a suitable location; or
- c) the development is for alternative sports and recreational provision, the benefits of which clearly outweigh the loss of the current or former use.

4.18 The land on which sport and recreation takes place is categorised as '*existing open space*' and '*sports and recreational land*'. Therefore, the proposed New Settlement is not only contrary to policies designed to protect and enhance General Aviation Airfields but also contrary to Government Policy relating to open space, sport and recreation.

4.19 Heritage Considerations

Tollerton Airfield holds a unique place in the history of UK aviation as in 1925 Nottingham became the first UK City to have its own Regional airport.

The land was secured by Sir Albert Ball, several times Lord Mayor of Nottingham and the father of the Royal Flying Corps Air 'Ace', also Albert, who became Great Britain's first prominent wartime aviator and whose deeds are commemorated by his statue which stands in the grounds of Nottingham Castle. This history and heritage cannot and should not be ignored or lost. We are aware that the Council once owned the airfield and still has a financial interest in it, which raises the question of why its future was ever put in doubt by the Outline consent. We are sure Sir Albert did not intend this very important asset to be squandered by his successors.

Aviation Heritage's submission will add further details of the airfield's wartime use in World War 2.

5. Conclusions

1. The extensive and vibrant use of Tollerton Airfield for a large number of flying related activities and many other community activities has not been given adequate consideration and weight by the Local Planning Authority.
2. There is no evidence that the Local Authority consulted with the GA industry or the operators on the site before reporting to the planning committee and recommending the Outline consent. The only aviation consultation was with the regulator, the Civil Aviation Authority, who do not, as a matter of policy, comment on individual applications and do not therefore represent the GA industry or the airfield operators and users.
3. Tollerton Airfield is a nationally and regionally significant aviation infrastructure asset of acknowledged importance by Government.
4. Any suggestion that Tollerton Airfield is now previously developed land / brownfield with a *prima facie* route to redevelopment for another use is presumptuous. It demonstrates a lack of consideration and, consequently, inadequate analysis leading to a poorly conceived conclusion. In formal discussions DLUC has advised the GAAC that the primary focus is on 'Redundant' Brownfield land, which Tollerton clearly is not. This means the decision to grant an outline consent without undertaking any local consultation, specialist research or requesting information is quite extraordinary.
2. Rushcliffe's own study of Housing Need published in 2021 (ref P17) confirmed that the supply of housing land currently available is sufficient to meet demand for the period 2021 - 2026 with a projected 9.2 years supply so the decision to grant the original outline consent or to approve the current application is neither justified or appropriate. If necessary more proportional and feasible alternatives could and should be carefully considered.
6. Experience with other development sites leads us to highlight the question of Infrastructure costs. In almost all the cases we have been involved with since 2016 this aspect has been either trivialized, or at least minimised, to avoid making the councillors and public aware of the real cost of mains services, land drainage, media services, road building/modifying and transport infrastructure improvements.

Instances of the impact of this feature include a large consented scheme in East Anglia that has now stalled due to insufficient water supply. In another case the Local Authority stated that the works would be procured via a S106 Agreement but, as the costs for the housing element alone are likely to be well in excess of £100M, none of which can be recouped until at least half the estate is completed and sold - currently estimated by the Council involved at 10 - 12 years - the developer(s) will have to carry the cost of servicing a very large debt for that period and beyond so,

in all probability the Council will be required to shoulder, at least in part of the interest costs due to the quantum of money involved.

7. Experience tells us that where there are no objections are made by existing occupiers, particularly those who have relatively recently relocated from other airfields, it is not unreasonable to assume that they have been influenced by the belief, at least, that they will be encouraged to relocate again in the event consent is refused. This effectively rules out important relevant evidence from the resident GA interests, hence the GAAC's assistance in putting the case for the industry. The combination of substantial facilities (hangars) for aircraft maintenance and commercial operations (hard runways) has become very rare in the Midlands now that other airfields (Leicester, Gamston, Coventry and, somewhat inadvertently, Cranfield) are either closing entirely, losing facilities or focusing on the technological developments referred to in this objection.
8. It is very unfortunate that the GAAC was only consulted at a very late stage in this process and we have not had the time to commission an Ecology survey of the site. We already know from experience elsewhere that, as the airfield was created in 1925, it will not have been contaminated with artificial fertilizers and weedkillers and is therefore uncontaminated meadowland, itself a protected status following the loss of 97% of UK meadowland since WW2 (BBC Countryfile). We have also seen, but not fully analysed, the Ecology report produced for the applicant and are concerned at the level of redaction it has been subjected to, particularly in relation to the habitats of Bats and Badgers. We strongly recommend a fully independent survey is carried out prior to any decision being made about the future of the airfield as mature ecologies take generations to create and any claim that they can be substantially replicated artificially is highly questionable, even on similar geology.
9. This proposal appears to be fundamentally flawed and unsound in respect of current Government Policy - both in the choice of this site and in respect of the proposed Development. It may be flawed in other respects, such as provision of a new Local Plan but as this only came to our attention very recently it has not been possible to fully review the processes behind both the Outline consent and Detailed proposal.
10. In conclusion, Tollerton Airfield is a National and regionally significant transport infrastructure asset of acknowledged importance in government policy. Tollerton is ideally located to the east of the city (noise pollution abatement) outside the defined barrier of the main Ring Road (vehicular access) It has established and growing links both nationally and internationally that make it an important economic asset for the Region and the City of Nottingham. It provides adjacent communities with a vibrant, well-located community facility for pilot training, business aviation, emergency services, Police, UAV operations, Sport, recreation and leisure that would be the envy of many councils. We firmly believe that Tollerton has a key role to play in the future of Nottingham's community and economy. It should be protected and cherished, not threatened with closure by artificial commerciality and hastily considered, development.

Appendix 1: Strategic Role of Tollerton Airfield

Considerations

1. With the potential loss of Leicester and Coventry, the reduction in GA facilities and traffic at Gamston and Cranfield the Midlands is in danger of being left behind the rest of the UK as aviation activity, particularly that of UAV's (Drones) and electric aircraft.
2. The current forecast is for 923,000 drones to be operating in the UK by 2030¹. Price Waterhouse Coopers (PWC) recently estimated drones could be worth £45 Billion to the UK economy by that time.² Almost all of this traffic will need operating bases with extensive maintenance facilities and large open areas for testing new or routinely serviced UAV's and, since they offer both, existing airfields are the obvious and most cost effective solution.
3. We know from our work with airfields around London that demand for business travel is likely to increase as traffic congestion gets worse and major conurbations will follow the pattern of executives arriving by aeroplane before transferring to helicopters or UAV's to reach inner city destinations. Tollerton's hard runways offer 24 hour operation and facilities and it is ideally located to provide this service not just to Nottingham but also other centres such as Leicester, Derby, Mansfield and Lincoln.
4. Similarly the demand for HeliMed and Police services are increasing so having a strategically positioned base such Tollerton is very important for the region.
5. The shortage of suitable alternative sites, particularly with the length of runway for larger higher powered aircraft is exacerbated by the proximity of a number of active military airfields such as Conningsby, Waddington and Syerston. These present a tightly controlled area of military aviation activity that is not generally available to light GA aircraft and certainly not larger business or cargo aircraft with their greater demands for maneuvering space and safety margins,
6. GA Members based at, or regularly using, Tollerton have pointed out the lack of other airfields offering a similar standard of facilities. Even beyond the immediate area Gamston is now restricted while other airfields lack the runway size and supporting facilities.
7. The relocation of existing occupiers to Langar is only a rumour, no agreement exists and the facilities at Langar could not absorb them. In addition the runways

¹ ARPAS

² [Advancing airborne autonomy: commercial drones saving money and saving lives in the UK](#) July 2022

are too short and combining the extensive parachuting activity would severely impact on all types of flying activity

8. There is little or no hangarage of any size available in the region and the market for enclosed and secure hangarage is growing, not only for the care of classic / vintage types, either fabric covered or with wooden structures that deteriorate very quickly but also to prevent engine thefts and meet the increasingly stringent insurers requirements.

The Strategic Role of Tollerton Airfield

9. The east Midlands is a well populated and developed part of the UK and new development requires careful consideration when balancing population demands in terms of housing with the provision of necessary infrastructure a concept endorsed by the Minister for Aviation and recognised by the Department for Transport. It is intended to ensure that principal urban areas have the facilities for business travel, emergency services, policing, traffic management and survey work together with training and recreational flying all accessible in each region.

10. *Emerging Changes and Future Aviation Issues*

11. In addition to all the considerations outlined above there needs to be provision for the added the impact of unmanned remotely controlled 'Drone' aviation activity. The technology is currently the subject of extensive trials around the UK for various applications and its potential growth is further evidenced by the current ARPAS membership of 250,000, even though development is still at the trialling stage. This compares with the number of licensed pilots in existing GA of circa 30,000 (actual numbers fluctuate with currency and valid medicals).
12. There is rapidly growing use of unmanned aerial vehicles for inspection purposes and for delivery systems, not only by commercial organisations but also the Utility providers, NHS and other Government bodies. This activity is already generating a need for storage, maintenance and servicing of the machines and emphasises the wisdom of retaining existing airfields as they are the most appropriate facilities for these purposes.
13. A further factor is the emergence of new aviation fuels ranging from electricity through hydrogen to ammonia and used cotton clothing. Electric aircraft were certified for use in 2021 and further development will very soon extend their range and utility. From discussions with the existing operators we are already aware of increasing interest due to the cleanliness and convenience of these forms of propulsion, particularly from the young. They are more economical to run and will be more convenient for some types of travel. The most frequently cited example at the moment is 'air taxis' but other additional uses are emerging too. We are also aware that Amazon are in discussion with the CAA about introducing their delivery services as these are likely to be on much larger scale than other operators.

Tollerton - Airspace and airfields in the East Midlands

APPENDIX A - OVERVIEW OF CIVIL & MILITARY CONTROLLED ZONES



APPENDIX A2 - CLOSE UP OF CONTROLLED ZONES AROUND TOLLERTON

