



The GAAC’s Response to the Government Consultation: “Proposed reforms to the National Planning Policy Framework and other changes to the planning system”

September 2024

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Question	GAAC Answer
1: Do you agree that we should reverse the December 2023 changes made to paragraph 61?	This is not directly relevant to our area of interest.
2: Do you agree that we should remove reference to the use of alternative approaches to assessing housing need in paragraph 61 and the glossary of the NPPF?	This is not directly relevant to our area of interest.
3: Do you agree that we should reverse the December 2023 changes made on the urban uplift by deleting paragraph 62?	This is not directly relevant to our area of interest.
4: Do you agree that we should reverse the December 2023 changes made on character and density and delete paragraph 130?	This is para 129. This is not directly relevant to our area of interest.
5. Do you agree that the focus of design codes should move towards supporting spatial visions in local plans and areas that provide the greatest opportunities for change s	This is not directly relevant to our area of interest.
6: Do you agree that the presumption in favour of sustainable development should be amended as proposed?	Yes
7: Do you agree that all local planning authorities should be required to continually	Yes



demonstrate 5 years of specific, deliverable sites for decision making purposes, regardless of plan status?	
8: Do you agree with our proposal to remove wording on national planning guidance in paragraph 77 of the current NPPF?	Yes
9: Do you agree that all local planning authorities should be required to add a 5% buffer to their 5-year housing land supply calculations?	Yes
10: If yes, do you agree that 5% is an appropriate buffer, or should it be a different figure?	This is not directly relevant to our area of interest.
11: Do you agree with the removal of policy on Annual Position Statements?	This is not directly relevant to our area of interest.
12: Do you agree that the NPPF should be amended to further support effective co-operation on cross boundary and strategic planning matters?	Yes
13: Should the tests of soundness be amended to better assess the soundness of strategic scale plans or proposals?	Yes, but there should be a clear proposal for the mechanism for this.
14: Do you have any other suggestions relating to the proposals in this chapter?	No
15: Do you agree that Planning Practice Guidance should be amended to specify that the appropriate baseline for the standard method is housing stock rather than the latest household projections?	Yes
16: Do you agree that using the workplace-based median house price to median earnings ratio, averaged over the most recent 3-year period for which data is available to adjust the standard method's baseline, is appropriate?	This is reasonable in the prevailing market.
17: Do you agree that affordability is given an appropriate weighting	This is not directly relevant to our area of interest.

<p>within the proposed standard method?</p>	
<p>18: Do you consider the standard method should factor in evidence on rental affordability? If so, do you have any suggestions for how this could be incorporated into the model?</p>	<p>This is not directly relevant to our area of interest.</p>
<p>19: Do you have any additional comments on the proposed method for assessing housing needs?</p>	<p>This is not directly relevant to our area of interest.</p>
<p>20: Do you agree that we should make the proposed change set out in paragraph 124c, as a first step towards brownfield passports?</p>	<p>This is paragraph 122c, not 124c. The principle of paragraph 122c is welcomed and acceptable. However General Aviation Airfields should not be considered to be 'suitable brownfield land'. Firstly, poor quality drafting, rather than deliberate action, downgraded their original protection and importance in planning policy; Secondly because the NPPF 2018 has now introduced strong and explicit policy support for General Aviation – for its economic value, support for business, use for leisure, training and emergency services; And, thirdly because it is now recognised that General Aviation Airfields constitute a substantial infrastructure asset which will only increase in importance. In more detail, Planning Policy Guidance for Housing, PPG3 at Annex C defined 'brownfield' as: 'The curtilage is defined as the area of land attached to a building. All of the land within the curtilage of the site (as defined above) will also be defined as previously-developed. However, this does not mean that the whole area of the curtilage should therefore be redeveloped. For example, where the footprint of a building only occupies a proportion of a site of which the</p>

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.' My emphasis

Under the provisions of the Planning and Compulsory Purchase Act 2004 PPGs were gradually replaced by Planning Policy Statements (PPS) and PPS3 amended the above to:

'Previously-developed land (often referred to as brownfield land) Previously-developed land is that which is or was occupied by a permanent structure, including the curtilage of the developed land and any associated fixed surface infrastructure.'

That definition included defence buildings, but excluded:

'Land that is or has been occupied by agricultural or forestry buildings. Land that has been developed for minerals extraction or waste disposal by landfill purposes where provision for restoration has been made through development control procedures.

Land in built-up areas such as private residential gardens, parks, recreation grounds and allotments, which, although it may feature paths, pavilions and other buildings, has not been previously developed. Land that was previously-developed but where the remains of the permanent structure or fixed surface structure have blended into the landscape in the process of time (to the extent that it can reasonably be considered as part of the natural surroundings). There is no presumption that land that is previously-developed is necessarily suitable for housing development

nor that the whole of the curtilage should be developed.’
In PPS 3, therefore, the specific reference to airfields was omitted but there is no documentary evidence to suggest that there was any deliberate intent to reclassify airfields. It has been described as an ‘administrative oversight’.
However, on 9 November 2015 Planning Minister Brandon Lewis went further, in responding to three questions from Dudley North MP Ian Austin he made a sweeping statement - ‘Currently, all airfields, as land that has been previously developed, are regarded as brownfield land.’ In addition, he did not refer the longstanding distinction between permanent built development on a site and the open land within the curtilage. There was and is no justification for this statement.
The current NPPF definition of ‘previously developed land’ states that ‘...it should not be assumed that the whole of the curtilage should be developed...’ (Mr Lewis’ assertion is in conflict with this). The NPPF goes on to exclude ‘recreation grounds’ from the definition of previously developed land – and GA airfields inter alia have a recreational function. This recreational function is fully upheld by Sport England and as airfields are defined as ‘sports venues’ they are protected by NPPF (new) paragraphs 87 and 95.
However, with Mr Lewis’ statement on the record and in the absence of a specific mention of airfields there is a significant risk that local planning authorities may suggest that General Aviation airfields are, in their entirety, brownfield. That

would devastate the UK General Aviation airfield network with concomitant impacts on for example, wider aviation research and development, and training. It should, however, also be noted that the Government's response to a petition seeking to overturn any reference to airfields as 'brownfield') clearly states 'Although [the PPG3] detailed explanation of curtilage was not carried forward into Planning Policy Statement 3, the assumption in relation to developing the curtilage of previously developed land, including airfields has remained the same and there has been no change to the policy relating to airfields in this respect.'

Since the PPS and the first NPPF, General Aviation Airfields have had a significantly higher national policy status. Paragraph 108(f) of the NPPF, introduced in 2018, now states that 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.'

The Department of Transport's 2023 General Aviation Handbook emphasises (inter alia) the strategic value of GA airfields for local assets, government services, STEM/workforce opportunities, regional connectivity, innovation and professional aviation training, as well as their contribution to the new technology which commences

	<p>at the local, GA, level and which will be scaled up for all aviation operations in the future.</p> <p>The Civil Aviation Authority has established the Airfields Advisory Team to advise and support general aviation airfields and helipads. To reiterate, there is no evidence that there has been any conscious intent to change the status of GA airfields and now, in the light of the entirely appropriate emphasis on the use of brownfield land, it is essential that the NPPF makes clear that airfields are not 'brownfield' sites.</p> <p>The mechanism to address this issue is to add 'general aviation airfields, helipads and hospitals' to the exclusions contained within the NPPF Glossary definition of 'Previously developed land'.</p>
<p>21: Do you agree with the proposed change to paragraph 154g of the current NPPF to better support the development of PDL in the Green Belt?</p>	<p>Yes, because this is often in locations well connected to urban areas.</p>
<p>22: Do you have any views on expanding the definition of PDL, while ensuring that the development and maintenance of glasshouses for horticultural production is maintained?</p>	<p>As set out in our response to Question 20, it is essential that General Aviation Airfields and Helipads are not categorised as 'PDL'</p>
<p>23: Do you agree with our proposed definition of grey belt land? If not, what changes would you recommend?</p>	<p>This is not directly relevant to our area of interest.</p>
<p>24: Are any additional measures needed to ensure that high performing Green Belt land is not degraded to meet grey belt criteria?</p>	<p>Many general aviation airfields and helipads are in the Green Belt and make an important contribution to preservation of the Green Belt, particularly in or close to major urban area as well as providing ecological, recreational and visual amenity. The request as set out in</p>

	our response to Question 20 would not only benefit General Aviation but would assist in the retention of valuable Green Belt land.
25: Do you agree that additional guidance to assist in identifying land which makes a limited contribution of Green Belt purposes would be helpful? If so, is this best contained in the NPPF itself or in planning practice guidance?	This is not directly relevant to our area of interest.
26: Do you have any views on whether our proposed guidance sets out appropriate considerations for determining whether land makes a limited contribution to Green Belt purposes?	Many general aviation airfields are in the Green Belt and make an important contribution to preservation of the Green Belt, particularly in or close to major urban areas as well as providing ecological, recreational and visual amenity. The request as set out in our response to Question 20 would not only benefit General Aviation but would assist in the retention of valuable Green Belt land.
27: Do you have any views on the role that Local Nature Recovery Strategies could play in identifying areas of Green Belt which can be enhanced?	This is not directly relevant to our area of interest.
28: Do you agree that our proposals support the release of land in the right places, with previously developed and grey belt land identified first, while allowing local planning authorities to prioritise the most sustainable development locations?	Yes, but subject to our firmly held views / position on the status of General Aviation airfields and helipads as set out in our response to Question 20. The sequential approach set out in paragraph 17 would, due to Mr Lewis' statement, place general aviation airfields and helipads under significant threat without the change set out in our response to Question 20.
29: Do you agree with our proposal to make clear that the release of land should not fundamentally undermine the function of the Green Belt across the area of the plan as a whole?	This is not directly relevant to our area of interest.

<p>30: Do you agree with our approach to allowing development on Green Belt land through decision making? If not, what changes would you recommend?</p>	<p>This is not directly relevant to our area of interest.</p>
<p>31: Do you have any comments on our proposals to allow the release of grey belt land to meet commercial and other development needs through plan-making and decision-making, including the triggers for release?</p>	<p>Yes, but subject to our firmly held views / position on the status of General Aviation airfields and helipads as set out in our response to Question 20. The sequential approach set out in paragraph 21 would, due to Mr Lewis' statement, place general aviation airfields and helipads under significant threat without the change set out in our response to Question 20.</p>
<p>32: Do you have views on whether the approach to the release of Green Belt through plan and decision-making should apply to traveller sites, including the sequential test for land release and the definition of PDL?</p>	<p>This is not directly relevant to our area of interest.</p>
<p>33: Do you have views on how the assessment of need for traveller sites should be approached, in order to determine whether a local planning authority should undertake a Green Belt review?</p>	<p>This is not directly relevant to our area of interest.</p>
<p>34: Do you agree with our proposed approach to the affordable housing tenure mix?</p>	<p>This is not directly relevant to our area of interest.</p>
<p>35: Should the 50 per cent target apply to all Green Belt areas (including previously developed land in the Green Belt), or should the Government or local planning authorities be able to set lower targets in low land value areas?</p>	<p>This is not directly relevant to our area of interest.</p>
<p>36: Do you agree with the proposed approach to securing benefits for nature and public access to green space where Green Belt release occurs?</p>	<p>Yes, provided it gives proper recognition to the role that many general aviation airfields offer particularly high quality green spaces and which are heavily used by local residents and visitors. They also very often have a great deal of biodiversity and many airfields are</p>

	working to improve this. Airfields are also available to provide additional biodiversity for housebuilders and others. In some urban areas, an airfield may be the only accessible open space – creating a green lung for local residents.
37: Do you agree that Government should set indicative benchmark land values for land released from or developed in the Green Belt, to inform local planning authority policy development?	This is not directly relevant to our area of interest although the removal of unrealistic 'hope value' on Green Belt land is, in principle, sensible.
38: How and at what level should Government set benchmark land values?	This is not directly relevant to our area of interest.
39: To support the delivery of the golden rules, the Government is exploring a reduction in the scope of viability negotiation by setting out that such negotiation should not occur when land will transact above the benchmark land value. Do you have any views on this approach?	This is not directly relevant to our area of interest.
40: It is proposed that where development is policy compliant, additional contributions for affordable housing should not be sought. Do you have any views on this approach?	No.
41: Do you agree that where viability negotiations do occur, and contributions below the level set in policy are agreed, development should be subject to late-stage viability reviews, to assess whether further contributions are required? What support would local planning authorities require to use these effectively?	This is not directly relevant to our area of interest.
42: Do you have a view on how golden rules might apply to non-residential development, including commercial development,	No.

travellers sites and types of development already considered 'not inappropriate' in the Green Belt?	
43: Do you have a view on whether the golden rules should apply only to 'new' Green Belt release, which occurs following these changes to the NPPF? Are there other transitional arrangements we should consider, including, for example, draft plans at the regulation 19 stage?	This is not directly relevant to our area of interest.
44: Do you have any comments on the proposed wording for the NPPF (Annex 4)?	No.
45: Do you have any comments on the proposed approach set out in paragraphs 31 and 32?	No.
46: Do you have any other suggestions relating to the proposals in this chapter?	No.
47: Do you agree with setting the expectation that local planning authorities should consider the particular needs of those who require Social Rent when undertaking needs assessments and setting policies on affordable housing requirements?	This is not directly relevant to our area of interest.
48: Do you agree with removing the requirement to deliver 10% of housing on major sites as affordable home ownership?	This is not directly relevant to our area of interest.
49: Do you agree with removing the minimum 25% First Homes requirement?	This is not directly relevant to our area of interest.
50: Do you have any other comments on retaining the option to deliver First Homes, including through exception sites?	This is not directly relevant to our area of interest.
51: Do you agree with introducing a policy to promote developments that have a mix of tenures and types?	This is not directly relevant to our area of interest.

52: What would be the most appropriate way to promote high percentage Social Rent/affordable housing developments?	This is not directly relevant to our area of interest.
54: What measures should we consider to better support and increase rural affordable housing?	This is not directly relevant to our area of interest.
56: Do you agree with these changes?	This is not directly relevant to our area of interest.
57: Do you have views on whether the definition of 'affordable housing for rent' in the Framework glossary should be amended? If so, what changes would you recommend?	This is not directly relevant to our area of interest.
58: Do you have views on why insufficient small sites are being allocated, and on ways in which the small site policy in the NPPF should be strengthened?	This is not directly relevant to our area of interest.
59: Do you agree with the proposals to retain references to well-designed buildings and places, but remove references to 'beauty' and 'beautiful' and to amend paragraph 138 of the existing Framework?	Yes.
60: Do you agree with proposed changes to policy for upwards extensions?	Yes.
61: Do you have any other suggestions relating to the proposals in this chapter?	No.
62: Do you agree with the changes proposed to paragraphs 86 b) and 87 of the existing NPPF?	Yes, and it should be clearly noted that general aviation airfields are increasingly contributing to the modern economy. For example, many are being used for drone testing and will provide, space, often close to urban areas, where new and emerging forms of aerial urban connectivity such as air taxis and delivery and distribution can be located.
63: Are there other sectors you think need particular support via	General aviation airfields play a crucial role in urban connectivity and emergency and security

these changes? What are they and why?	services and should be considered to be a critical part of the transport infrastructure in the UK. They therefore require the explicit recognition and protection as we have set out in our response to Question 20.
64: Would you support the prescription of data centres, gigafactories, and/or laboratories as types of business and commercial development which could be capable (on request) of being directed into the NSIP consenting regime?	This is not directly relevant to our area of interest.
65: If the direction power is extended to these developments, should it be limited by scale, and what would be an appropriate scale if so?	This is not directly relevant to our area of interest.
66: Do you have any other suggestions relating to the proposals in this chapter?	This is not directly relevant to our area of interest.
67: Do you agree with the changes proposed to paragraph 100 of the existing NPPF?	We support the emphasis on modern economies and consider that the contribution made by general aviation activity should be fully recognised and protected. As noted above, the recognition is set out in NPPF paragraph 108(f) and the protection must be provided by the proposed modification to the NPPF Glossary definition of 'Previously developed land'.
68: Do you agree with the changes proposed to paragraph 99 of the existing NPPF?	Yes.
69: Do you agree with the changes proposed to paragraphs 114 and 115 of the existing NPPF?	Yes.
70: How could national planning policy better support local authorities in (a) promoting healthy communities and (b) tackling childhood obesity?	This is not directly relevant to our area of interest.

71: Do you have any other suggestions relating to the proposals in this chapter?	This is not directly relevant to our area of interest.
72: Do you agree that large onshore wind projects should be reintegrated into the s NSIP regime?	We have no direct response to this but it is essential that whether NSIP or not, wind projects must always take account of potential risk to aviation activity.
73: Do you agree with the proposed changes to the NPPF to give greater support to renewable and low carbon energy?	Yes, but renewable and low carbon energy projects must always take account of potential risk caused to aviation activity.
74: Some habitats, such as those containing peat soils, might be considered unsuitable for renewable energy development due to their role in carbon sequestration. Should there be additional protections for such habitats and/or compensatory mechanisms put in place?	This is not directly relevant to our area of interest.
75: Do you agree that the threshold at which onshore wind projects are deemed to be Nationally Significant and therefore consented under the NSIP regime should be changed from 50 megawatts (MW) to 100MW?	We have no specific view on this, but wind projects must always take account of potential risk caused to aviation activity.
76: Do you agree that the threshold at which solar projects are deemed to be Nationally Significant and therefore consented under the NSIP regime should be changed from 50MW to 150MW?	We have no specific view on this, but solar projects must always take account of potential risk caused to aviation activity by glint and glare.
77: If you think that alternative thresholds should apply to onshore wind and/or solar, what would these be?	This is not directly relevant to our area of interest.
78: In what specific, deliverable ways could national planning policy do more to address climate change mitigation and adaptation?	Support for General Aviation includes support for the development of aircraft powered by electricity, hydrogen and sustainable aviation fuel (SAF). The process of scaling up of these new

	fuels is already making significant progress.
79: What is your view of the current state of technological readiness and availability of tools for accurate carbon accounting in plan-making and planning decisions, and what are the challenges to increasing its use?	This is not directly relevant to our area of interest.
80: Are any changes needed to policy for managing flood risk to improve its effectiveness?	This is not directly relevant to our area of interest.
81: Do you have any other comments on actions that can be taken through planning to address climate change?	As set out in our response to Question 78, aviation must evolve to improve its environmental footprint and the support for, and maintenance of, thriving General Aviation activity in the UK does and will continue to contribute to this.
82: Do you agree with removal of this text from the footnote?	This is not directly relevant to our area of interest.
83: Are there other ways in which we can ensure that development supports and does not compromise food production?	This is not directly relevant to our area of interest.
84: Do you agree that we should improve the current water infrastructure provisions in the Planning Act 2008, and do you have specific suggestions for how best to do this?	This is not directly relevant to our area of interest.
85: Are there other areas of the water infrastructure provisions that could be improved? If so, can you explain what those are, including your proposed changes?	This is not directly relevant to our area of interest.
86: Do you have any other suggestions relating to the proposals in this chapter?	No.
87: Do you agree that we should we replace the existing intervention policy criteria with the revised criteria set out in this consultation?	This is not directly relevant to our area of interest.
88: Alternatively, would you support us withdrawing the	This is not directly relevant to our area of interest.

criteria and relying on the existing legal tests to underpin future use of intervention powers?	
89: Do you agree with the proposal to increase householder application fees to meet cost recovery?	This is not directly relevant to our area of interest.
90: If no, do you support increasing the fee by a smaller amount (at a level less than full cost recovery) and if so, what should the fee increase be? For example, a 50% increase to the householder fee would increase the application fee from £258 to £387.	This is not directly relevant to our area of interest.
91: If we proceed to increase householder fees to meet cost recovery, we have estimated that to meet cost-recovery, the householder application fee should be increased to £528. Do you agree with this estimate? Yes No – it should be higher than £528 No – it should be lower than £528 no - there should be no fee increase Don't know	This is not directly relevant to our area of interest.
92: Are there any applications for which the current fee is inadequate? Please explain your reasons and provide evidence on what you consider the correct fee should be.	This is not directly relevant to our area of interest.
93: Are there any application types for which fees are not currently charged but which should require a fee? Please explain your reasons and provide evidence on what you consider the correct fee should be.	This is not directly relevant to our area of interest.
94: Do you consider that each local planning authority should be able to set its own (non-profit making) planning application fee?	It should remain as a national system for transparency.

95: What would be your preferred model for localisation of planning fees?	We would not support this.
96: Do you consider that planning fees should be increased, beyond cost recovery, for planning applications services, to fund wider planning services?	Planning application fees for new general aviation airfields – being based on site area and then classified as ‘major’ – are exorbitant and a major deterrent. We understand the need to increase fee income for planning authorities and improve their ability to serve their community well but the current system of site area is not always justified.
97: What wider planning services, if any, other than planning applications (development management) services, do you consider could be paid for by planning fees?	Major commercial developments may be able to fund this, but for many small projects the fees are already high – and a deterrent for small businesses. In addition, General Aviation airfields constitute part of national aviation infrastructure, the Government should consider a distinction between commercial development and infrastructure.
98: Do you consider that cost recovery for relevant services provided by local authorities in relation to applications for development consent orders under the Planning Act 2008, payable by applicants, should be introduced?	No, this does not seem reasonable.
99: If yes, please explain any particular issues that the Government may want to consider, in particular which local planning authorities should be able to recover costs and the relevant services which they should be able to recover costs for, and whether host authorities should be able to waive fees where planning performance agreements are made.	N/A
100: What limitations, if any, should be set in regulations or through	N/A

<p>guidance in relation to local authorities' ability to recover costs?</p>	
<p>101: Please provide any further information on the impacts of full or partial cost recovery are likely to be for local planning authorities and applicants. We would particularly welcome evidence of the costs associated with work undertaken by local authorities in relation to applications for development consent.</p>	<p>N/A</p>
<p>102: Do you have any other suggestions relating to the proposals in this chapter?</p>	<p>No.</p>
<p>103: Do you agree with the proposed transitional arrangements? Are there any alternatives you think we should consider?</p>	<p>This seems reasonable.</p>
<p>104: Do you agree with the proposed transitional arrangements?</p>	<p>This seems reasonable.</p>
<p>105: Do you have any other suggestions relating to the proposals in this chapter?</p>	<p>We support digitisation which should identify the safeguarded areas around general aviation airfields to assist in the protection of airfields from development that could adversely affect general aviation activity.</p>
<p>106: Do you have any views on the impacts of the above proposals for you, or the group or business you represent and on anyone with a relevant protected characteristic? If so, please explain who, which groups, including those with protected characteristics, or which businesses may be impacted and how. Is there anything that could be done to mitigate any impact identified?</p>	<p>No.</p>

