

Response to EXQ2

General Aviation Awareness Council

Relevant Representation Reference Number [REDACTED]

SS 2.4 Aviation safety resolution - Agent of Change

The relevance of the 'agent of change' is that the All-Party Parliamentary Group – Aviation,, which was reformed in 2017, sought to increase the protection of General Aviation Aerodromes. That led to the specific reference to General Aviation in paragraph 111 of the NPPF and also to the specific identification of aerodromes having protection under the agent of change principle.

The NPPF paragraph 200 states:

*'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.'*

On 23 July 2019, the MCHLG published new guidance on the Agent of Change. This specifically applies the Agent of Change Principle to airfields.

This guidance is intended:

- a. To avoid adverse effects on noise-sensitive development
- b. Encourage developers to work together with aerodrome operators

The new guidance states:

How can the potential impact of aviation activities on new development be addressed through the planning system?

'The agent of change principle may apply in areas near to airports, or which experience low altitude overflight, where there is the potential for aviation activities to have a significant adverse effect on new noise-sensitive development (such as residential, hospitals and schools). This could include development in the immediate vicinity of an airport, or the final approach and departure routes of an operational runway, and locations that experience regular low altitude overflight by general aviation aircraft, where this activity could subject residents or occupiers to significant noise, air quality issues and/or vibration impacts. The need for and type of mitigation will depend on a variety of factors including the nature of the aviation activity, location and normal environmental conditions in that context. Local planning authorities could consider the use of planning conditions or obligations to require the provision of appropriate mitigation measures in the new development.'

Paragraph: 012 Reference ID: 30-012-20190722
Revision date: 22 07 2019

How can local authorities and airport operators mitigate the environmental impacts of airport expansion?

'The management of environmental effects associated with the development of airports and airfields is considered in detail in the [Aviation Policy Framework](#). Planning authorities and airport operators are encouraged to work together to develop mitigation measures that are proportionate to the scale of the impact. Development that would increase air movements may require an Environmental Impact Assessment (where it meets the relevant threshold in Schedule 2 to The Town and Country Planning (Environmental Impact Assessment) Regulations 2017). It may be appropriate to consider, as part of any proposed mitigation strategy, how operational measures, siting and design of new taxiways, apron and runways, and ground-level noise attenuation measures could reduce noise impacts of expansion or increased utilisation to a minimum.'

Paragraph: 013 Reference ID: 30-013-20190722
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The Civil Aviation Authority's Combined Aerodrome Safeguarding Team (CAST), 'Advice Note 1, Aerodrome Safeguarding – An Overview' has copious references to the responsibilities of the '**aerodrome operator**' as the person or organisation responsible for aerodrome safeguarding.

The GAAC endorses the site specific issues cogently set out by the expert Operators of Tibenham, Raydon Wings, Priory Farm and Chase Farm aerodromes which clearly demonstrate that the Applicant's proposals unnecessarily constitute an agent of change and place unreasonable restrictions on them.