



22 April 2025

Greater Nottingham Planning Manager
Greater Nottingham Planning Partnership

Dear Sir

**Greater Nottingham Strategic Plan
Publication Draft Consultation (March 2025)
Policy 31**

Introduction

The General Aviation Awareness Council (GAAC) objects to Policy 31 which would involve the loss of Nottingham (Tollerton) Airport.

The GAAC was formed over twenty 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 Association (AOPA), the Light Aircraft Association (LAA), the Honorable Company of Air Pilots (HCAP), the Aerodrome Operators Group (AOG), the British Business and General Aviation Association (BBGA), the Flying Farmers Association (FFA) the British Gliding Association (BGA), British Microlight Aircraft (BMAA) and ARPAS and the Association of Remotely Piloted Aircraft Systems. It comprises 40,000+ members involved in fixed wing, helicopter, Microlight, Balloon, Drone and Aeromodeller activities.

Wherever possible, the GAAC works in conjunction with complementary organisations such as Sport England, the RSPB and CPRE. In January 2018 the All-Party Parliamentary Group for General Aviation formed four 'Working Groups' of specialists to advise on Airfields, Airspace, Tax & Regulation and Heritage. The GAAC provides half of the Airfields Working Group including its chairman. It is intimately involved in both the GA industry and with Parliamentary process.

Key Issues

The GAAC is familiar with the planning history of this site and the views of the Council as set out in paragraph 3.31.3 of the draft GNSP. However, it is very concerned that:

- a) The original Local Plan policy was **unsound** in that it failed to take account of material considerations. This is transposed into the new policy;

- b) **Strategically important issues** and up to date planning policies have not been taken into account;
- c) The Council's **policy requirements and objectives** could be achieved whilst retaining an operational aerodrome. There is no justification for the assertion that retention of an operational airfield is incompatible with the delivery of land for large scale housing.

The GAAC therefore urges the Partnership to reconsider the detail of this policy.

a. Unsound

The draft policy fails to address the value and importance of Tollerton's aviation history, current aviation value and future aviation potential.

NPPF

NPPF paragraph 111(f) states *'Planning policies should.... recognize 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' – recognizing 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' – even small GA aerodromes have an economic value. Within the strategic network, each contributes to the whole, in differing ways and to varying extent.

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

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...'*

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 111 which specifically focuses on General Aviation.

Government Aviation Policy Statements

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.*’

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 106 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.

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).

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.

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 when a number of airfields have closed. This is relevant to any suggestion that the existing aviation activities might be able to move to an alternative location.

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.

A Green Paper 'Aviation 2050' was issued in 2018 for consultation but has not yet progressed further. 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.*'

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.'

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.'

The Minister's statement in issuing the 'Roadmap' in 2021 is a succinct summary of overall Government policy and aspiration which includes the following:

'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.

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.'

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 and the opportunities for GA in respect of:

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

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

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

Government planning policy for GA aerodromes is set out above together with the intertwined recreation policy. But, the NPPF also protects open space. Paragraph 104 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.*

There does not seem to have been any evaluation of the area of land needed to retain a viable aviation operation. In addition, the draft Strategic Plan has not set out any assessment to justify the wholesale loss of the aerodrome nor is there any evidence that the Partnership has examined an option which retains a core aviation function.

b. Strategically Important Issues

Planning Policy

The aviation related policies which seek to protect and enhance aviation assets have not been assessed or taken into account. They post-date the original proposals for Tollerton and therefore in drafting a new policy for the aerodrome and surrounding land, should have been given full consideration and carried great weight.

Historic Value

The historic status and value of this site has not been considered, apart from the Listed Pill Boxes. It was the second UK Municipal Licensed Aerodrome in 1929. The Partnership could and should take pride in this legacy.

The national, wartime, upgrade also constitutes nationally important investment which is highly unlikely to be capable of replacement. The cost of the creation of a comparable new airfield today would be in excess of £100m and this asset should not, therefore, be lost.

The Aerodrome should be regarded as a valuable local asset for its historic value as well as its recreational and economic value as set out below.

Recreational Value

The existing and potential recreational value of this site has not been assessed. The site is used for flying training, recreational flying, transportation and a wide range of events. The Sherwood Flying Club has been operating for nearly 70 years.

As stated above, all aviation sports are recognised by Sport England and open land at an Aerodrome can and does accommodate many other sports and recreational activity.

Economic Value and Potential

The economic value and potential of the site has not been considered. It has been used for business and economic activities. It also offers a wide range of training opportunities. There is current demand for this and strong indications that with new, less expensive modern, clean, quiet aircraft (increasingly electric) that access to small regional aerodromes such as Tollerton will increase.

The need for improved connectivity is growing and, as road congestion increases, it is becoming more efficient and cost-effective for businesses to use aviation services

The Leicester Education Business Company has established AeroDiscover for Leicestershire and Nottinghamshire with the goal of bringing *'the world of aviation directly to students'* as a part of national initiatives to support aerospace STEM subjects. VSTEAM also offers STEM Workshops for Schools in Nottinghamshire including aircraft workshops.

The Reach for the Sky programme funding was renewed in February 2025 *'...to encourage more young people into a career in aviation, helping to secure long term economic growth and ensuring the sector has the workforce needed for the future.'*

Its aim is *'Supporting young people to pursue careers such as pilots, navigators and controllers also aligns with the government's ambition to go further and faster to kickstart growth.'*

The justification for this support is *'...with the air transport and aerospace sector contributing £20 billion to the UK economy, investment in the next generation of professionals will secure long-term economic growth and deliver on the government's Plan for Change.'*



c. Policy Requirements and Objectives

In conclusion, the retention of the aerodrome would facilitate the continuation of aviation business and sporting activity without compromising policy requirements and objectives. The Strategic Plan would be strengthened by this amendment to the Plan.

The retained aerodrome land could provide for a variety of business activities, both related to aviation and complementary. The proposed 15 ha of employment land could be provided on the edges of the flying area and, if appropriate be designed so as to minimise noise disturbance to residential areas beyond.

This would also provide the opportunity to attract valuable high technology companies that would utilise the aviation services.

The land associated with the aerodrome could be used for a variety of other sport and recreational activity so the site would be available for multiple recreational uses.

If the site with the retention of the aerodrome and locating employment at the core of the aerodrome does not provide adequate land for the necessary housing, the site boundaries, potentially to the south, could be enlarged.

If you have any queries, please do not hesitate to contact me

Yours sincerely

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