

House of Commons, London, SW1A 0AA

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

The Rt Hon James Brokenshire MP  
Secretary of State for Housing, Communities and Local Government  
Ministry of Housing, Communities & Local Government  
Fry Building, 2 Marsham Street  
Westminster  
London, SW1P 4DF

22 October 2018

*Dear James,*

**RE: New Monks Farm Planning Application (AWDM/0961/17 & AWDM/1093/17)**

The All-Party Parliamentary Group on General Aviation (APPG-GA) has closely monitored the progress of the recently approved New Monks Farm development which will see over 600 dwellings and commercial buildings built in close proximity to Brighton City Airport (Shoreham).

The APPG-GA supports housebuilding and mixed-use aviation developments, however we are most concerned that the decision-making process adopted by the Local Planning Authority, coincidentally also the freehold owners of the two relevant sites, has not given due regard to protecting the continued safe operation of the airfield. This is a view clearly supported by existing users and independent consultants.

In this circumstance, the APPG-GA, consisting of 174 aviation-minded parliamentarians, considers it necessary to ask that you call in this application for a review based on proper consultation with the airfield users and full consideration of independent specialist advice.

Our concerns focus on the following aviation specific issues:

1. The National Planning Policy Framework (NPPF)
2. Aerodrome Safeguarding
3. Operational Safety
4. Lack of independent evidence

The NPPF now recognises the importance of maintaining a national network of general aviation airfields and recognises their contribution to national infrastructure and the UK economy Sub-paragraph 104 (f) reads:

*“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.”*

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There is widespread concern in the aviation community that the introduction of new noise sensitive developments (such as residential housing) in close proximity to long-established flying sites may in future force the latter to alter their operations or even close down due to noise complaints. Planners need to be aware of the extent to which certain levels of noise may be the unavoidable consequence of maintaining levels of commercial activity at aerodromes and that this may constrain options for nearby developments.

This decision, which would locate significant developments to the west and north east of the main 02/20 runway, was made following minimal consultation with the CAA and no regard for 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 independent technical evidence supplied to them demonstrating the adverse impact of the development on existing airfield operations and those that may emerge in the future.

We are concerned that, although discussions may have been held with the Airfield Operator, little if any prior consultation took place with organisations who actually operate both fixed and rotary wing aircraft from Shoreham. No attempt was made to procure independent technical reports on safety concerns raised in their correspondence. Furthermore, the decision also fails to recognise Section 52 of the Councils own Operational Management Agreement with the Airfield operator, which seems to have been ignored since its most recent review in 2002.

As a licensed Airfield Shoreham should have a current Safeguarding plan. York Aviation's first report for the developer in January 2018 mentioned (p4) the adverse effect of the development on the airfield's operation but negated its impact in the conclusion. Their second report of July 2018, also prepared for the developer, contains a Safeguarding plan model, this was compared with one constructed by an independent authority and found to be inaccurate. When asked, the Head of Planning told the Hearing that he relied on York Aviation (consultant to the developer) who advised that the inaccuracies made no difference to their conclusion, contrary to the comment in their first report produced a year earlier.

The developer and council claim that the new scheme will not affect existing airfield operations. This has not been substantiated by independent evidence. Accidents happen and provision must be made to ensure public safety, building houses on land so close to an airfield that could easily need to be used in the event of engine failure/bird strike would inhibit existing operations and increase the risk of injury both in the air and on the ground.

Of the 28 National and International airports officially safeguarded in England, only 11 were busier than Shoreham last year<sup>1</sup>. Operations at those 11 airfields are mainly by multi-engine aircraft flown by professional pilots whereas the majority of operations at Shoreham are by single engine aircraft flown by trainee pilots leading to a higher risk of accidents.

The applicant's initial report, and advice given to us by an independent adviser, show that the outline planning approvals given on 3<sup>rd</sup> October 2018 for a site on the north east corner of the airfield and New Monks Farm<sup>2</sup> 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 hazard. The larger residential scheme to the west of the airfield is positioned so close to the existing

<sup>1</sup><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>

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

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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 landings, something both parties should ideally want to avoid.

Training in rotary wing aircraft involves significant circuit flying. Helicopters produce noise (rotor slap), often as result of wind impacting on the rotating blades as well as the engine(s). Residents close to the airfield would be subject to this noise every flying day and some evenings. The potential for friction between users and residents to further constrain airfield operations is self-evident. Suggestions that the circuit itself can be moved fail to consider the surrounding area, minor alterations may be possible but the existing circuit is the only practical way of meeting existing and foreseeable requirements.

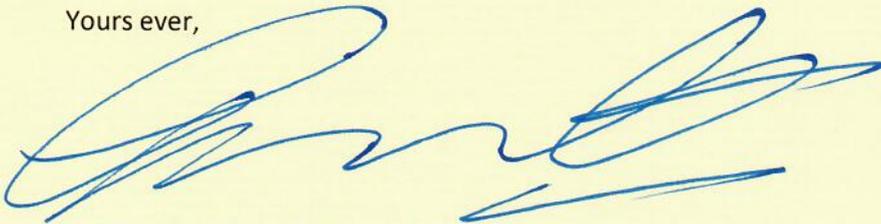
Given all of these issues, it does not appear that the planning process has been carried out objectively. There is a total lack of independent, specialist evidence to support the claims of the developers and LPA.

Shoreham is also the oldest continuously used aerodrome in the UK, it has a significant place in our national heritage and should be protected. Planning applications should be evidenced by site visits and detailed research not decided by a minority expressing views based on misinformation and local prejudice. Shoreham is unique and historic with an important future ahead with national and international aviation growing in importance. For such a significant national asset to be unnecessarily constrained would reflect very poorly on the Council and the Sussex region.

Once an airfield is gone, it is virtually impossible to replace. It would be a great shame if Shoreham followed the fate of other airfields, driven out of business by a sheer lack of aviation understanding during the planning process.

On this basis we would ask you to call in these applications.

Yours ever,



**The Rt Hon Grant Shapps MP**  
Chair of the All-Party Parliamentary Group on General Aviation

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