



The General Aviation Awareness Council
President: The Lord Rotherwick

WELWYN HATFIELD LOCAL PLAN (2013-2032)
LOCAL PLAN EXAMINATION

SUBMISSION BY GENERAL AVIATION AWARENESS COUNCIL

STAGE 3: Matter 4 Topic Specific Policies

SADM7: New and existing Community Services and Facilities

Question 25: *'Is the permanent loss of Panshanger airfield contrary to national policy, in particular Paragraphs 28, 74 and 70 of the National Planning Policy Framework (NPPF)?'*

Introduction

The General Aviation Awareness Council (GAAC) is recognised by the Government and the Civil Aviation Authority (CAA) as the body that speaks for General Aviation on planning and environmental issues.

The term 'General Aviation' encompasses all civil aviation other than scheduled air services or freight operations for remuneration or hire. It therefore covers a wide range of activity including (but not limited to) flight training, leisure and business flying, sight seeing, gliding, ballooning, parachuting and emergency police and air ambulance activities.

Of growing importance, aerodromes such as Panshanger are increasingly recognised for the role that they play in connectivity across a national network of airfields¹ and also as educational hubs where young people can find a range of ways to begin to engage with STEM subjects.

The GAAC has previously made objections to Policy SP18 if the proposed development would lead to the loss of Panshanger airfield. It welcomes the opportunity to respond to Question 25 and elaborate on the reasons why the permanent loss of Panshanger airfield would be contrary to the provisions of the NPPF.

In addition to the paragraphs specifically mentioned by the Inspector, the GAAC also wishes to draw attention to paragraph 33 of the NPPF. The permanent loss of Panshanger airfield would also be contrary to this paragraph.

¹ Planning Practice Guidance, Paragraph 012 Reference ID: 54-012-20150313

The GAAC understands that this hearing is not dealing with the site specific issues in respect of Policy SP18. However, the views expressed in this submission should be taken into account when that Policy is subject to detailed review. In particular, Policy SP18 as currently composed would not secure the future of Panshanger airfield and the GAAC is concerned to ensure that it is modified to facilitate this.

Response to the Inspector's Question

NPPF paragraph 28 supports a prosperous rural economy and requires local plans to:

- Support the sustainable growth and expansion of all types of businesses
- Promote the development of land based rural businesses
- Support sustainable rural tourism and leisure developments that benefit rural businesses, communities and visitors
- Promote the retention and development of local services and community facilities...such as... sports venues

Panshanger airfield, first established in 1940 as a decoy for Hatfield, has been a thriving business for many years. The recent temporary closure, closely related to the proposed redevelopment of part of the site, could be reversed and support for the ongoing growth and expansion of the site would be in line with the provisions of the NPPF and should therefore be facilitated in Policy SP18.

Sited in a rural area (as are most general aviation airfields), this is clearly a rural business. It employed 33 FTE people, had a GVA of £2.02 million (York Aviation 2014) and purchased goods and services from a range of local suppliers.

The GAAC's Appendix 1 to its October 2016 representations drew attention to the economic value of General Aviation to the UK economy and the specific value of Panshanger airfield to the local area.

Until the recent closure the business at Panshanger airfield was thriving and its reestablishment which Policy SP18 seeks is fully in line with paragraph 28 as the airfield has and can continue to provide sporting, leisure and tourism opportunities.

The level of local involvement in Panshanger was very high prior to the closure of the site. The level of 12,000 members in the airfield club was extraordinary and was explained in detail in our October 2016 submission.

It is worth noting that the establishment of new airfields by reason of cost and regulation is extremely difficult, and the GAAC is well qualified to be making this statement. Therefore the retention of an existing site is of very great importance in a key location in the South East with a large population catchment.

NPPF Paragraph 74 states that existing open space, sport and recreational land should not be built on unless:

- The open space and land is surplus to requirements
- The loss would be replaced by equivalent or better provision
- The development is for an alternative sport and recreational use with needs outweighing the loss

It is clear that none of the exceptions to the main thrust of paragraph 74 apply. The airfield is not surplus to requirements as evidenced by the widespread support for its retention and, the absence of any evidence that other airfields north of London have the capacity and suitability to meet the aviation needs Panshanger could accommodate.

There is no proposal to replace it with an equivalent or better provision and, as explained above, it is extremely difficult to establish new airfield facilities. An airfield such as Panshanger is a very valuable resource. Generally, paragraph 74 is directed at sites such as playing fields. These are also valuable resources but there are generally choices of playing fields within a community. An airfield is a more unique facility and not substituted as easily as some other open space or recreational land. Panshanger airfield is one of a small number of general aviation airfields between the edge of London and Luton in an area of growing aviation demand.

The GAAC's October 2016 representations explained in some detail the loss of General Aviation airfields in the London area and the ideal location of Panshanger in relation to the airspace restrictions resulting from Luton, Stansted and Heathrow airports.

Sport England's quite unusual interest in Panshanger is instructive. It considers the important economic and community sports role of Panshanger to be of such significance that its permanent loss would be to the detriment of 'Air sports' and considers it to be a strategically important site for that activity.

NPPF Paragraph 70 requires planning policies to:

- Plan positively for community facilities so as to enhance the sustainability of communities
- Guard against the unnecessary loss of valued facilities
- Ensure that established facilities are able to develop for the benefit of the community
- Take an integrated approach to the location of housing and community facilities

Panshanger airfield has been a part of its local community for many years and could continue to enhance and contribute to the larger community now planned for Panshanger as long as Policy SP18 is properly formulated so as to facilitate this.

Panshanger airfield is a facility valued in the immediate local community and by people living further away. The planning policies as currently drafted give inadequate protection against the unnecessary loss of this valued facility.

As the Panshanger airfield remains an 'airfield' in planning terms, it must be treated in policy terms as an 'established facility' which was a licenced airfield prior to its recent closure. It is acknowledged that its layout in the future may need to change and the runway realigned but in planning policy terms, the draft Local Plan as currently structured does not ensure that this facility could be developed for the benefit of the community.

In similar vein, the Local Plan as currently structured has failed to take an integrated approach to the location of the proposed new housing and this established community facility. The priority to be given to new housing is understood and accepted but it is possible, at Panshanger to enable both housing and community facility to be co-located, subject to the policy being correctly formulated.

NPPF Paragraph 33 requires plans to take account of the role of airfields in serving business, leisure, training and emergency service needs.

The Welwyn Hatfield Local Plan initially failed to give any account to the long standing and well established role of Panshanger as a local facility serving business, leisure, training and emergency service needs. In the course of its modification Panshanger airfield has now been given some recognition but the Local Plan currently still fails to take adequate account of the airfield. As the Local Plan is currently formulated the re-establishment of an airfield at Panshanger could be achieved. The forthcoming discussion on SP18 must ensure that this policy takes full account of the airfield, enabling it to operate alongside the planned new housing.

A number of appeal decisions in 2017², relating to Manston Airfield, which dismissed proposals for non-aviation use of this site drew on the provisions of Paragraph 33 of the NPPF. Paragraph 15 of the Inspector's decision tested the provisions of Local Plan policy EC4 and the Inspector concluded, *'Furthermore, I find the overall approach of Policy EC4 to be consistent with the Framework. This recognises that plans should take account of the growth and role of airports and airfields in serving business, leisure, training, and emergency service needs.'*

SADM7

Policy SADM7 sets out how applications relating to the loss or change of use of community facilities will be managed.

The first provision requires an application to demonstrate there is no current demand for the facility or an alternative recreational, leisure or community use or any prospect of such demand arising within a realistic timeframe.

² Appeal A Ref: APP/Z2260/W/15/3140995 Building 1, Former Manston Airport, Kent, CT12 5BL
Appeal B Ref: APP/Z2260/W/15/3140990 Building 2, Former Manston Airport, Kent, CT12 5BL

Appeal C Ref: APP/Z2260/W/15/3140992 Building 3, Former Manston Airport, Kent, CT12 5BL

Appeal D Ref: APP/Z2260/W/15/3140994 Building 4, Former Manston Airport, Kent, CT12 5BL

In the case of Panshanger Airfield there is a wide range of evidence demonstrating user demand until the airfield was unilaterally closed by the landowners. The clear expression from a range of interested parties evidences that the airfield remains in demand and would be brought back into use if opportunity allows it.

The second provision of SADM7 requires effectively the availability of an alternative. There is no evidence of this and as has already been described, the likelihood of this being possible remains extremely remote. The existing airfield has the benefit of an established use, a track record of meeting CAA licensing requirements, access, and access to land where essential support facilities can be provided. It also has a well established position within the aviation community and within the local community of Panshanger.

The third provision of SADM7 requires any new development to incorporate or provide an appropriate alternative on the site or in its vicinity with equivalent or better provision. No alternative is currently being proposed on the site or in the vicinity.

Therefore, at the present time, the residential development proposed under Policy SP18 would fail all of the tests of SADM7.

Conclusion

Policy SP18 of the draft Local Plan is currently unsound as the provisions of SADM7 cannot be satisfied and this would lead to the permanent closure of Panshanger airfield.

As the draft Local Plan would currently lead to the permanent closure of Panshanger airfield, it does not comply with paragraphs 28, 70 74 or 33 of the NPPF.

The GAAC welcomes the recognition now given in the draft Local Plan to Panshanger airfield, but policy SP18 as drafted does not allow a realigned runway and re-organised airfield to be delivered.

The detailed discussion on SP18 will elaborate on this matter and the GAAC will set out the revisions needed to make SP18 sound, to overcome the current conflict with the NPPF and SADM7 and ultimately to prevent the permanent closure of Panshanger airfield and provide the opportunity to re-establish a General Aviation and Air sports facility that can make an important contribution to local and regional economic and community facility needs.

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