

Statement Regarding Panshanger Airfield: NPPF 2012 guidelines and Policy SADM 7 demonstrate the airfield should be retained.

For clarification, the site retains its current planning permission as an airfield and is only non-operational due to the withdrawal of the lease to the flying school in 2014. The use has not been abandoned, only temporarily interrupted and is therefore **currently** an airfield and sporting facility.

The Inspector's question 25 asks:

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)?

The answer to the Inspector's question is that the permanent loss of the airfield would clearly be contrary to government policy in the NPPF.

Several reports, referred to throughout, illustrate the value of Panshanger Airfield to the local and aviation communities:

- 1) The North London Flying School (NLFS) report (22/04/14) in the Local Plan evidence base. (NLFS 2014) EIP document ref OSC 6e.
- 2) York Aviation Limited (YA) report (YA 2014) on The Economic Impact of Panshanger Aerodrome (August 2014), commissioned by local community group Panshanger People but not included in the Council evidence base.
- 3) Letter from Sport England regarding the proposed SASP categorisation (13/12/2013). EIP document ref OSC 6a
- 4) 2018 Report from YA on the minimum requirements for a reinstated airfield to be compliant with CAA regulations (YA 2018).
- 5) Evidence of support for retaining Panshanger Airfield from Panshanger Community Airfield Limited's Project Phoenix (PCAL 2018).

In the following discussion, reference is made to operations that previously existed at the airfield in the reasonable assumption that these would be recreated.

We also draw the Inspector's attention to NPPF paragraph 33 and to SADM 7, both of which are highly relevant to this discussion. At the centre of the argument, however, is the question of whether there is the practical capability of reinstating a runway on land which would remain available to the north of the Greenbelt line as assumed in Policy SP 18. Reference to this site specific policy is therefore also necessary at this stage.

NPPF Paragraph 28.

This paragraph relates to the growth of business, tourism and leisure in rural locations.

Business

- Whilst operational, NLFS was a business employing up to 16 full time and 34 part time, equating to 33 FTE plus 10 indirect and induced jobs locally. The corresponding GVA was estimated by York Aviation (YA) in 2014 as £2.02 million. Local businesses benefitted, amongst them suppliers for the café and local hotels (NLFS 2014 p30). NLFS ran 13 training aircraft with 8-9 flying instructors and also 29 private aircraft based at the airfield.
- NLFS also had an aircraft maintenance and fuelling facility, businesses which served Panshanger based pilots, those from local airfields and airstrips and other visiting aircraft.

- Business connectivity is enhanced by GA aircraft. Several aircraft owners, either local or frequent visitors to Panshanger, used their aircraft for flying to business meetings (e.g. p33 NLFS 2014). Business leaders in the area including Tesco, EE and Computacenter expressed their support for potential business flights (YA 2014 page iii and 20) and an air taxi business on the airfield could provide enhanced connectivity options for local businesses. The proximity of Panshanger to Welwyn Garden City, and Welwyn North stations also allows easy travel into and out of London.
- The availability of smaller airfields for business aviation purposes is highly valued by the business community (YA 2014). Business aviation has the ability to fly at short notice, to a bespoke schedule and itinerary, and to numerous airports or aerodromes both in the UK and Europe that are not served by commercial scheduled flights. This flexibility is a key feature of business aviation and makes it a high value business tool.
- An area with a local airfield has a key economic advantage and makes it an attractive place to live for local employers hoping to attract staff. A general aviation aerodrome can make a contribution to attracting and retaining inward business investment. (YA 2014)
- More than 70% of General Aviation (GA) flights nationally have some connection with business or safety (YA 2014).
- Panshanger Aerodrome therefore makes a significant contribution to local policy objectives by supporting inward investment and business retention and jobs in the local area. The future potential of the airfield for business would have considerable benefit to the local area (as evidenced in YA 2014).

Leisure

- Sport England consider Panshanger Aerodrome as a strategically important site for aviation that is of regional importance to air sports. It was also proposed as a candidate for a Special area for sport (SASP) and the Letter from Sport England explains this process.
- It enhances the sporting and recreational offer in the Borough making it an attractive place to live by providing a social amenity for flying (YA 2014).
- With an estimated 18,500 aircraft movements a year (take-offs and landings), the NLFS was one of the busiest flying schools and small aerodromes in the country (NLFS 2014).
- The school also had its own aerobatics team who won many medals and accolades.
- One young trainee at the school who first joined aged 11, helped in the café to pay for his flying lessons and has subsequently gone on to win a beginners level aerobatics award aged 16, before becoming the youngest licensed pilot (microlight) on his 17th birthday.
- Many thousands of people would visit the airfield café as a pleasant and interesting location to meet, including many cyclists and walkers.

Tourism

- Panshanger Airfield was a tourist destination and had a membership of over 12,000 people, the majority of whom came from the Welwyn Hatfield area. Page 13 of NLFS 2014 shows their distribution.
- NLFS hosted numerous aviation events which were attended by a large number of local residents as well as those from further away. These ranged from small aviation lectures, Aerobatic displays, charity events, and an annual fireworks display, up to the very popular annual Revival Day which included historic aircraft for visitors to view, flight displays, vintage cars, and many other activities attended by 1000s of visitors.

[Panshanger airfield creates and supports economic growth and sustainable development in the rural area in which it lies. It is an important rural tourism and leisure development that benefits](#)

businesses in the rural area as well as communities and visitors, respecting the character of the countryside where it lies since being created in WW2. It should be supported by Local Plan policy, not undermined or annihilated by it. A permanent loss of Panshanger Airfield would clearly be contrary to Paragraph 28 of the NPPF.

NPPF Paragraph 70.

This paragraph relates to the social, recreational and cultural facilities and services the community needs. In addition to the points relating to Leisure and Tourism above, there are social, community and educational advantages to the Borough that an airfield provides.

- The NLFS prided itself on its outreach to younger members with special events, training for air cadets, links with local schools and also with the UH's Aeronautical department.
- This connection with UH could be strengthened in future with joint projects between the airfield and the university, that could be supported by Hertfordshire LEP. This would promote the transfer of STEM skills and is supported by the University.
- In addition, outreach to local schools would also provide enhanced STEM skills for pupils.
- Charitable activity, included donations of flying experiences and special days for groups of disadvantaged people to visit and enjoy the airfield are important. Groups such as Aviation without borders, Fly2help, Herts Aid and the Welwyn Hatfield Mayoral charity all benefitted (NLFS 2014).
- The airfield has a history which is valued locally. A report for the Council by Atkins (EiP document library reference: HIS/2) concluded: *"the site does have a recognisable character as it stands today. ...and a character that still reflects its relationship to its earlier WWII role."* Given the area's strong aeronautical links, especially with De Havilland, who ran Panshanger Airfield at one stage, a small museum would also be appropriate, which would be an additional educational and tourist attraction.

The draft local plan does not comply with NPPF Paragraph 70 because it fails to plan positively for the retention of Panshanger Airfield, fails to guard against its loss as a valued facility and service, fails to ensure that the airfield is able to develop and modernise, fails to ensure that it is retained for the benefit of the community and fails to provide an integrated approach to the retention of the airfield and the provision of housing.

The draft Local Plan policies in fact cause the permanent loss of Panshanger Airfield and thereby prevents the recreational and cultural facilities provided by the airfield from taking place. It removes a valued air-sport facility (and the chance to discover and participate in air-sports) from the Borough and the local area.

To retain the benefit of this facility, the Local Plan must ensure that it supports and strengthens through policy, a commitment to retain an aerodrome at Panshanger and facilitate its proper reinstatement. Whilst a re-aligned runway may also allow the opportunity for some housing development subject to detailed design, enough space and land must be integrated into any design or Masterplan for housing and other development to ensure the safe operation of the airfield and also provision for necessary ancillary buildings (such as a clubhouse, café, maintenance hangar and fuelling), parking (for cars and aircraft) and necessary restricted areas clear of obstruction. [ref YA 2018 on minimum requirements]

NPPF Paragraph 74

This relates to assessment of the potential loss of facilities or alternative provision

The Draft Local Plan is not compliant with this Paragraph on most of its requirements.

- No assessment has been made to show that the open space, buildings or land is surplus to the requirements of the airfield. Such an assessment would demonstrate the opposite – that it is not surplus to requirements. A mixed development may be possible, but sufficient space and land must be allowed in the master plan for an airfield which complies with all appropriate CAA safety standards and other requirements from the CAA.
- No provision has been proposed to replace the loss of the airfield with equivalent or better provision for air-sports, leisure and recreation to match the airfield facility.
- The only alternative provision proposed is for housing, which is not a sporting or recreational provision and does not outweigh the loss of the facility.

NPPF Paragraph 33

This relates to airfields such as Panshanger (which are not subject to a separate national policy statement) and requires Local Plans to take account of their growth and role in serving business leisure, training and emergency services.

One aspect which has not been covered above is flight safety. Panshanger Airfield has a clear role in preserving air safety, by providing a safe emergency landing area. Panshanger is able to be used as a safe landing area for Helicopter Emergency Services as well as Medical Evacuation, with fuel and other services available. Panshanger lies in a unique position in a narrow corridor between Luton, Stansted and London controlled air space creating some of the worlds most congested air space. Panshanger provides a safe landing area for any aircraft which has an emergency or is in distress, and has saved the lives of several people. It is uncertain whether a GA aircraft in distress would be able to divert to Luton or Stansted as this would be problematic for small aircraft. At Luton (which is not part of the Strasser Scheme to waive charges for airplanes on emergency diversion) they would certainly be penalised financially for doing so - one pilot was charged £1200 for his emergency landing at Luton. This has the potential to influence a life-saving decision by a pilot. Another pilot and his passenger were able to land at Panshanger airfield in 2015, even after it closed, having suffered electrical problems and a cockpit filling with smoke. This pilot would probably not have reached an alternative airfield, without a highly increased level of danger to both occupants and would have faced a much riskier landing in an agricultural field had Panshanger not been available.

This airfield also has exceptional drainage. Panshanger is able to remain open in bad winters when many other airfields were forced to close due to waterlogging. This makes the runway at Panshanger a significant asset to the GA community, allowing guaranteed usability at all times of the year (YA 2014).

By not actively supporting the retention and development of the airfield, its growth and role in serving business, leisure, training and emergency service needs, the draft Local Plan is not taking account of the growth and role of Panshanger Airfield and is therefore not complying with Paragraph 33 of the NPPF.

Policy SADM 7

This part of the submission responds to the provisions of SADM 7. However, the discussion around SADM 7 at Stage 3 will be of relevance to the consideration of Policy SP18 in Stage 4 of the Examination and will be referred back to at that stage.

Policy SP 18 is currently not sound, as Figure 11 of site SDS1, forming a part of Policy SP18 does not permit the development proposed by SP 18 to be carried out in accordance with the policy. The provisions of SADM 7 would be frustrated unless figure 11, forming a part of Policy SP 18, is amended.

SADM 7 states that:

Planning permission will only be granted for proposals involving the loss or change of use of Community services or facilities in the following circumstances:

- I. It can be clearly demonstrated that there is no longer a current demand for such a facility or for alternative recreational, leisure or community use, or any real prospect of such a demand arising within a realistic timeframe:*

Welwyn Hatfield Council have not demonstrated that there is no current demand for Panshanger airfield. The evidence available demonstrates an extremely strong demand for the airfield. The Council have not acknowledged significant interest from several potential operators who have, since 2014, demonstrated to them a real desire to bring the airfield back into use. There is certainly a very keen demand both from residents and aviators that the airfield is retained:

- A potential operator has recently submitted outline planning permission to the Council for reinstating the runway and necessary ancillary buildings.
- A petition signed by over 4000 people who are mostly local residents, calls on the Council to reinstate the airfield. Many of these have shared their dismay that the airfield might not be available to the community in the future. Other evidence of local support is demonstrated in the attached report from Panshanger Community Airfield Limited from their Project Phoenix (which was set up to gather support for the airfield's reinstatement). (PCAL 2018)
- Far from demonstrating that there is no longer a current or a foreseeable demand for this facility, they have chosen not to acknowledge the clearly expressed wishes from business and local residents to retain it.
- At Elstree Aerodrome (the only other comparable GA airfield in Hertfordshire), circuit training – a key part of pilot training – is often impossible due to over-capacity. Flight training North of London simply cannot be met with the current number of airfields and is set to get worse if more airfields are removed.

- II. It can be clearly demonstrated that an acceptable means of meeting any such demand is or will become available before the loss of the existing facility:*

No such demonstration has been made by the Council and no alternatives to the existing facility have been proposed. There are none. There is no existing provision within Welwyn Hatfield Borough that could replace Panshanger Airfield and the Council have not proposed a viable and suitable future alternative.

- III. The new development consists of, incorporates, or provides an appropriate alternative recreational or community service or facility, either on site or within the vicinity, of equivalent or better provision in terms of quantity and quality in a suitable location accessible to the local community. Demand should be assessed according to the nature of the existing facility in question.*

No such appropriate alternative facility to replace the current airfield has been proposed either on site, or in the vicinity.

For clarification, Policy SP 18 also needs to be examined at this stage: Policy SP 18 states that: *“in addition, the Masterplan will allow the opportunity for a realigned grass runway on land the north of the Green Belt boundary”*.

This statement is inaccurate and wrong – a grass runway entirely to the north of the GB boundary is neither feasible nor practicable. The masterplan as it is drawn in figure 11 of the draft Local Plan, does not permit sufficient space and land for an airfield to safely operate according to strict requirements of CAA CAP 168 (which set out minimum safety requirements for airfield operations). Safety in such matters is paramount. The master planning of the site would require not insignificant changes to comply with this requirement as well as changes to the landscaping requirements. The spatial requirements for an operational runway to be compliant with the CAP 168 are summarised in the short report from York Aviation (YA 2018). This clearly demonstrates the minimum required area of land for an airfield operation to be safe and how much of the rest of the site could then be given over to other development. It also makes it clear which part of the site needs to be clear of obstructions. The Council have clearly not considered such matters before drawing up Local Plan Policy SP 18 and figure 11.

[Policy SP 18 \(together with figure 11\) should therefore either be declared unsound or require a Main Modification to be considered sound and compliant with SADM 7 and NPPF guidelines. This should be addressed as soon as possible in the Local Plan process.](#)