

Welwyn Hatfield Borough Council Local Plan Examination in Public 2018: Stage 3

Matter 4: Topic Specific Policies, SADM7 New and Existing Community Services and Facilities

Representations prepared by Lichfields on behalf of Mariposa Limited and Homes England (formerly the Homes and Communities Agency)

1.0 Introduction

- 1.1 This Statement responds to matters raised by the Inspector ahead of the Stage 3 public hearings.
 - 1.2 Our clients, Mariposa Limited and Homes England (former Homes and Communities Agency), are the owners and promoters of Land to the North East of Welwyn Garden City (WGC4).
 - 1.3 This Statement deals specifically with the Inspector's question on Topic Specific Policies in respect of Policy SADM 7 'New and existing Community Services and Facilities'.
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2.0 Matter 4: SADM 7 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)?

- 2.1 It is the view of our clients that the permanent loss of the Panshanger airfield, at Land North East of Welwyn Garden City (settlement policy SP18, site allocation WGC4) is not contrary to national policy, for the reasons detailed below. If, contrary to this, there is any conflict with the NPPF, that conflict is outweighed by the social, economic and environmental benefits of the development of the former Airfield for housing and associated community facilities.

Background

- 2.2 The private airfield that operated at land North East of Welwyn Garden City closed in September 2014. The airfield, which was leased from Mariposa, was the base for the North London Flying School and acted as a local flying club for 15-25 individuals with privately-owned light aircraft. Following expiry of the lease and closure of the airfield in September 2014 all users relocated their light aircraft within the notice period.
- 2.3 The former airfield use at Panshanger was a privately run airfield. While we understand that it had many 'members' (we believe most were not flyers), some of whom used the café, it was not a facility or service which met the day to day needs of a community. We note that the former Panshanger airfield and land adjoining (Homes England land) was nominated by local residents as an Asset of Community Value. However, the Council declined to add the land to the list of assets of community value on the ground that "The actual current use of the Land is as a commercial transport facility and flying school, run as a business accessible to members only and as such, is a business facility AND does not qualify as being of community value AND does not further the social wellbeing or social interests of the local community" (letter dated 18 July 2013, **Appendix 1**).
- 2.4 As the Inspector will be aware, land at North East of Welwyn Garden City as identified in the emerging site allocation Policy SP18 was considered, consulted upon and designated in the 1993 District Plan as an 'Area of Special Restraint', thereby safeguarding the land for future

development as and when evidence demonstrated it is required. This designation remained in the following Local Plan. It has, therefore, always been recognised and known that the airfield was a short term use for the land.

2.5 WHBC has subsequently undertaken the exercise of identifying the needs of the Borough and identified at paragraph 14.31 of the Local Plan that *“In the light of evidence about the need for housing in Welwyn Hatfield, it is appropriate that [the] site be released for development now.”* There was no equivalent evidence of any need to retain the airfield. Given the evidence, a balanced decision was made by the local planning authority that the need for housing was greater than a need for an airfield.

2.6 The landowners have no intention to use or permit the use of their land at Panshanger as a private airfield. Homes England is a public body the objects of which are set out in statute¹, and include “to improve the supply and quality of housing in England”. As such, we confirm that it is the intention of the landowners to deliver a sustainable residential-led development on non-Green Belt land, in accordance with the Council’s emerging site allocation, and in response to the latest evidence that stresses the acute need for new housing within the housing market area. There is no realistic prospect that the land which is proposed to be allocated (for a residential-led development) by settlement policy SP18 will be used as an airfield.

Response to Questions

2.7 In Question 25, the Inspector asks whether the permanent loss of the airfield is contrary to policy and refers to a number of potentially relevant paragraphs contained within the NPPF.

2.8 In the first instance, we would note that there are no specific policies or guidance in the NPPF that refers to General Aviation airfields. In this regard, we note that the paragraphs that the Inspector refers to relate to rural economy, community facilities and sports facilities and we respond to each below.

2.9 **Rural Economy: - Paragraph 28** falls under the heading of ‘Supporting a prosperous rural economy’. The paragraph states that planning policies should *“support economic growth in rural areas in order to create jobs and prosperity by taking a positive approach to sustainable new development”*, and *“promote the retention and development of local services and community facilities in villages”*. Welwyn Garden City is defined in the Council’s emerging Local Plan as a ‘major town centre’ (Policy SP3 ‘settlement hierarchy’). Panshanger lies to the north east of Welwyn Garden City and is sustainably located with links and connections to Welwyn Garden City. It is not within a “village”, and any significance it may have is to the urban, as opposed to rural economy. As such, it is not considered that paragraph 28 is relevant in regards to the Council’s drafting of policy SADM 7 specifically in relation to Panshanger and Welwyn Garden City.

2.10 On the economic value of the former airfield, when Panshanger airfield was in operation, it generated around 20 FTE jobs. As a consequence, it was not regarded by the Council as being a significant employment generating use within the Borough. In this regard, it is also noted that in a letter dated 12 October 2015 from the Hertfordshire Local Enterprise Partnership **(Appendix 2) (Examination document OSC 6f)** that was issued to WHBC Policy Officers it was confirmed that *“the LEP would not consider that a runway at Panshanger would constitute a strategic piece of infrastructure which is required for Hertfordshire’s economic growth”*.

2.11 The first bullet of paragraph 28 refers to support for the sustainable growth of all types of business and in the third bullet to support for rural leisure uses. It is considered that it would not be appropriate for an airfield at this edge of urban location to grow, as this would give rise to

¹ Section 2 of the Housing and Regeneration Act 2008

significant impacts on both existing and proposed local residents, and that it is not 'necessary' to locate a leisure development at this location.

- 2.12 In comparison, a Socio-Economic assessment undertaken by Lichfields indicates that the proposed development, for 650 homes in accordance with the site allocation policy, would have a direct employment of 65 jobs (45 full time equivalents) – in respect of the primary school, community hall and retail use. The construction element would amount to approximately £61 million and generate 75 temporary construction jobs per year (over an eight year construction period) (65 FTE).
- 2.13 With regard to bullet point 4 (which appears to be the most relevant to the Inspector's question) we have already commented that the airfield is not "in" a "village". In addition, bullet point 4 states that planning policies should "promote the retention and development of local services and community facilities in villages, such as local shops, meeting places, sports venues..." As detailed above, Panshanger airfield was a private airfield, where individuals flew private light aircraft as a recreational activity. Panshanger also undertook Private Pilot Licence (PPL) training and continuing training (eg for Instrument Rating). The flying related activities were not local services in that the area served was not restricted to the locality.
- 2.14 Notwithstanding that there was a members' café on site, this facility is not considered to be a 'local service' serving the local communities day-to-day needs or 'community facility' supporting a village. It did not provide a public sports facility.
- 2.15 In this context, if economic and community benefits are issues for this location, the Inspector will note that Settlement Policy SP18 (NE WGC) requires the site to deliver a number of community facilities: including a local shop, a community hall, a two-form entry primary school and public play and recreation facilities including allotments. These are the community services and facilities referenced within Policy SADM 7 and defined by WHBC at paragraph 8.32 – 8.35 of SADM 7 justification text. These would be of significantly greater value to the local community than the previous café.
- 2.16 Overall the proposed allocation does not conflict with paragraph 28 of the NPPF.
- 2.17 **Community Needs: - Paragraph 70** (Promoting healthy communities), second bullet states that planning policies should "guard against the unnecessary loss of valued facilities and services, particularly where this would reduce the community's ability to meet its day-to-day needs". The underlining is our emphasis as we consider that this goes to the heart of the government's intent on this matter. The critical consideration for retention must be whether the facilities are valued. In considering that matter it is necessary to consider why such facilities are valued, and in particular whether loss would reduce the community's ability to meet its 'day to day needs'. An airfield with ancillary facilities such as a café, does not fall within the category of a valued facility of the type contemplated in paragraph 70, such as a local village shop, pub, or community hall. The loss of an airfield would not reduce the community's ability to meet its day to day needs.
- 2.18 It is noted that the Panshanger airfield was valued by some local residents – it is understood this is mostly due to some residents' enjoyment of watching planes flying and sitting in the café. However, although valued by some, the airfield did not fall within the general class of community facilities protected by the second bullet point of paragraph 70 of the NPPF. In any event the development contemplated by policy SP18 (WGC4) will not lead to any loss of any community facility as there is no facility at present, and there is no prospect of such an airfield being re-provided on its former site.
- 2.19 Therefore, the permanent loss of Panshanger airfield is not contrary to paragraph 70 of the NPPF.

- 2.20 Finally, the last bullet point of paragraph 70 refers to the need to ensure an integrated approach to considering the location of housing, economic uses and community facilities and services. It has been noted above that the emerging policy for the site seeks the integration of housing and community facilities with the wider community. In arriving at this policy, the Council expressly had regard the loss of the former Panshanger airfield, but balanced this against the benefits of releasing of the site so as to meet the acute housing need within the Borough. This careful consideration of Officers led the Council to determine that *“the need for housing is of greater importance than the need to retain a former airfield facility as a potential SASP for future sport provision, so it is appropriate that the site be released for development now”* (Paragraph 14.32 Local Plan).
- 2.21 Therefore, the permanent loss of the airfield is not an ‘unnecessary loss’, as it will enable the provision of new homes alongside community services and facilities that are required (school, shop, community hall, allotments and open space), and these new facilities and services will be used by the whole community, on a day-to-day basis.
- 2.22 **Recreation: - Paragraph 74** (Promoting healthy communities) states that:
“Existing open space, sports and recreational buildings and land...should not be built on unless
 - *an assessment has been undertaken which has clearly shown the open space, buildings or land to be surplus to requirements”*
- 2.23 In the first instance, it will be noted that the airfield is no longer an existing active facility. To the extent that paragraph 74 is directed at the lawful, rather than active use of land, we reiterate that we do not consider that a private General Aviation airfield should be considered under this paragraph as it is not a public facility and only serves a very limited few.
- 2.24 Notwithstanding this, it is considered that the permanent loss of the airfield should be accepted, as there is no evidence that an airfield at this location is necessary and it is noted that in 2014 all planes relocated to other airfields in the area, evidencing that there was capacity at neighbouring airfields. A Report by ASA in March 2014 concluded that the overall demand for recreational flying and private pilot training in the UK has been relatively static over the past 10-15 years, with a general decrease in the number of new PPLs and an increase in PPL renewals and revalidations. At that time, Panshanger was one of several general aviation airfields in the North London area offering PPL training and private flying facilities. The others include Elstree, Stapleford, Denham, North Weald and Wycombe (Booker) Air Park. At 2014, Panshanger and North Weald had the lowest level of aviation activity and had less modern facilities than the others.
- 2.25 Sport England’s Regulation 19 Representations (**Appendix 3**) state that *“Since 2014, Sport England has been working with the LAA [Light Aircraft Association] to identify potential Significant Areas for Sport (SASP) in England for air sports. SASPs are identified by Sport England in consultation with sports national governing bodies in order to recognise and raise awareness of the most important sites for sport in the country.”* However, to date, we understand that the SASP work has not been undertaken and, therefore, there is no evidence to confirm that the airfield needs to be retained. As stated above, there is no national policy that confirms that airfields should be retained.
- 2.26 It is understood that, since the closure of the airfield in September 2014, a small number of interested airfield groups have met with WHBC Officers to discuss obtaining and running an airfield at the site. However, over that three year period, no third party has been able to provide a business plan that demonstrates that an airfield could be delivered on the site.
- 2.27 Paragraph 173 of the NPPF states Local Plans should be deliverable. As no party has been able to prepare a valid business plan to operate an airfield, there is no case to safeguard the land for an airfield, as against delivering much needed new housing.

- 2.28 Paragraph 74 also refers to a replacement facility. If the land for a realigned runway is safeguarded, as currently identified in the emerging Plan, and if it is modified within the emerging site allocation, as sought by objectors, there would be a reduction in the developable area for new homes. In addition, the very linear shape of the site would significantly impact on the quality of development that could be achieved.
- 2.29 Overall, the permanent loss of the airfield is not considered to be contrary to the intent of this paragraph.
- 2.30 If, contrary to the submissions above, it is concluded that there is any conflict with National Policy, Mariposa and Homes England submit that this is significantly outweighed by the benefits of releasing the land for housing. To the extent that there is a need for private aviation, the fact that the aircraft for Panshanger have all been located elsewhere demonstrates that this need can be met at other airfields. In contrast, as rehearsed in other parts of the emerging Plan, there is a significant unmet need for housing in Welwyn Garden City. If and so far as the former café associated with the airfield could be regarded as a community facility, the benefits of that will be replaced and significantly exceeded by the community facilities proposed as part of the redevelopment of the site.

Appendix 1: Welwyn Hatfield BC ACV Notice of Decision



Mr A Wells
Mishcon de Reya
Summit House
12 Red Lion Square
London
WC1R 4QD

Pam Kettle
Director (Finance and Operations)

Reply To: address as below
Our Ref: MS/Community Assets
Date: 18th July 2013
Direct Tel: 01707 357 458
Fax: 01707 357 587
Email: m.storey@welhat.gov.uk

Dear Mr Wells

Notice of Decision:

Panshanger Airfield- Nomination for listing as an Asset of Community Value
Section 91 Localism Act 2011 (the Act) and the Assets of Community Value (England)
Regulations 2012 (the Regulations)

An application was made on 12th July 2013 under section 89 of the Act for inclusion of the Land in the Council's list of Assets of Community Value.

The Land that was the subject of the nomination, is the land situated at and known as Panshanger Airfield HD 258058 & HD 402757 (plans currently being reproduced and to follow).

The Council hereby gives Notice in accordance with section 91 of the Act, that the Land nominated above has not been included in the list of Assets of Community Value.

The reason for the decision to refuse to include this in the list is as follows:

Reasons

The actual current use of the Land is as a commercial transport facility and flying school, run as a business accessible to members only and as such, is a business facility AND does not qualify as being of community value AND does not further the social wellbeing or social interests of the local community.

Next steps

Pursuant to section 93 of the Act, the nominated land will now be included in the list of land nominated by unsuccessful community applications and all the relevant parties will be notified accordingly.

Review of Decision

Welwyn Hatfield Borough Council, The Campus, Welwyn Garden City, Herts AL8 6AE
DX 30075, Welwyn Garden City 1

Tel: 01707 357000
www.welhat.gov.uk



In accordance with section 92 of the Act, only the Owner of the Land may seek a review of this decision, if it is to include any land on the list of Assets of Community Value.

Yours sincerely

Mike Storey
Corporate Property Manager

Appendix 2: LEP Response on Airport – October 2015

Sue Tiley
Planning Policy and Implementation Manager
Welwyn Hatfield Borough Council
The Campus
Welwyn Garden City
Herts AL8 6AE

12 October 2015

Dear Sue,

Many thanks for your letter dated 22 July 2015 asking for the LEP's views on the importance of the aerodrome to the local economy of both Welwyn Hatfield and Hertfordshire and whether we consider that there is a strategic need to retain the runway. I apologise for the delay in responding.

You sent through a number of documents for our consideration and considered the contents carefully in compiling this response. These documents are:

- "The Economic Impact of Panshanger Aerodrome" prepared by York Aviation in August 2014
- "Outline Business Plan for Panshanger Airfield" prepared by British European Aviation
- "Panshanger Airfield: Review of the York Aviation Economic Impact Report" prepared by ASA on behalf of Mariposa in May 2015
- "Panshanger Airfield: Review of British European Aviation's proposed business plan" prepared by ASA on behalf of Mariposa in May 2015

I have also met with Jane Quinton and Nigel Pickard concerning the airfield, who also provided a significant amount of information and examples from elsewhere.

The factors I have considered are as follows:

- Would a runway at Panshanger make a significant contribution to the infrastructure of Hertfordshire and significantly increase its connectivity?
- Would the type of employment or skills align with key economic sectors which the LEP prioritises?
- Would the level of employment and wider economic benefits be significant ?

BioPark, Broadwater Road, Welwyn Garden City, Hertfordshire, AL7 3AX
01707 358744 • info@hertfordshirelep.co.uk • www.hertfordshirelep.co.uk

In terms of whether a runway at Panshanger would be a significant piece of infrastructure provision I have considered the following factors:

- The close proximity of Luton and Stansted airports, as well as proximity to Heathrow.
- The proximity and facilities available at other General Aviation Airfields, particularly at Elstree within Hertfordshire
- The previous use of the runway predominantly for flight training and recreational flying
- The proposal by BEA, which would also be predominantly for flight training and recreational flying
- The difficulties (both in terms of site constraints and costs) there would be in upgrading the site to be suitable for business flights and its unsuitability for helicopter flights

On the basis of these factors, the LEP would not consider that a runway at Panshanger would constitute a strategic piece of infrastructure which is required for Hertfordshire's economic growth. However, it does appear that there may be a shortage of capacity of General Aviation Airfields in the area north of London, including Hertfordshire, but this view is based due to anecdotal views on the difficulties of booking flight slots at Elstree and the type of flight training provided with limited take off and landing practise (compared with Panshanger).

Turning to the employment and skills angle and whether it is a strategic fit with the LEP's priorities. Our sector priorities include advanced manufacturing which would include aerospace. In terms of skills, we are interested in increasing STEM (Science, Technology, Engineering and Maths) subjects as well as ensuring that training is provided to meet employer demands. In looking at the Panshanger operation, it would seem that both the flying school and hangaraged planes were likely to be small planes and older vehicles and that this would be unlikely to change with the BEA proposal and on a small scale basis. Whilst there is definitely a need for this type of service and may help to inspire some young people or provide hands on experience, it doesn't represent the knowledge, use, application or innovation around modern technology or engineering. It is difficult to make a case for aerospace clustering at this location when there is Airbus in Stevenage, and Stansted and Luton airports just over the Hertfordshire boundary.

In terms of supporting University courses, the amount of flying required by the University of Hertfordshire courses (20 hours) does not seem a large figure and the current arrangements with Stapleford (whilst not ideal) seem to be working.

Lastly I have considered what the greatest economic benefit would be of the options that are being presented. The options which the Council are considering would seem to be :

- A) the repositioning of the current grass runway to the north of the site with housing and other amenities on the south side – provision of up to 500 homes
- B) No runway – provision of up to 700 homes
- C) Proposed amendment green belt boundary limits – provision of up to 1000 homes

So the assessment would need to be whether there is greater economic benefit in options A or B (which cover the same area). We are not able to tell from the documents provided which option would provide the greatest economic benefit.

In addition, I am not aware of any businesses raising with us the importance of Panshanger or received any correspondence from businesses dismayed at its closure.

In conclusion, the provision of a runway at Panshanger may provide some local economic benefit or may assist to relieve possible congestion at Elstree.

In terms of funding for a new runway or other airfield infrastructure costs, a bid would need to be made setting out the economic and business case for the loan. It would be in competition with a wide range of other projects and would probably not score highly for either strategic fit or value for money based on the information provided so far.

Yours sincerely

Joan Hancox
Infrastructure & Growth Manager

Appendix 3: Sport England's Regulation 19 Representations

Comment

Consultee	Mr Roy Warren (715268)
Email Address	roy.warren@sportengland.org
Company / Organisation	Sport England
Address	Sport Park 3 Oakwood Drive Loughborough LE11 3QF
Event Name	Draft Local Plan Proposed Submission Document
Comment by	Sport England (Mr Roy Warren)
Comment ID	dlpps638
Response Date	21/10/16 11:16
Consultation Point	Policy SP 18 North East of Welwyn Garden City - SDS1 (WGC4) (View)
Status	Processed
Submission Type	Web
Version	0.2
Files	Gavin Barwell MP letter 20160822
4	
Do you consider the draft Local Plan is legally compliant?	Yes
If no, is this because it is NOT: (see guidance notes for respondents)	
5	
Do you consider the Local Plan is sound?	No
If no, is this because it is NOT: (see guidance notes for respondents)	<ul style="list-style-type: none"> . Effective . Consistent with national policy

Please give details of why you consider the draft Local Plan is either sound or unsound. Please be as precise as possible. (Attach supporting documents if necessary).

Summary

Further to our separate representation on Policy SADM21 which raised potential concerns about the allocation of site SDS1 (WGC4) for housing in terms of the implications of providing a realigned runway on potential dwelling capacity, this representation sets out our detailed comments on the development allocation of the North East of Welwyn Garden City site which includes the Panshanger Aerodrome site.

Appropriate consideration should also be given to the representations made on this policy by the General Aviation Awareness Council (GAAC) which represents the air sports governing bodies on aviation planning matters and the Light Aircraft Association (LAA), the national governing body for light aircraft flying. Sport England works in partnership with the GAAC and LAA on planning matters concerning aviation facilities that are used for air sports.

The representation sets out our support for the principle of retaining Panshanger as an operational airfield through realigning the runway to the north of the Green Belt boundary as proposed in policy SP18 but sets out the changes that are considered necessary to the policy to ensure that a feasible and deliverable aviation facility (suitable for air sports) could be delivered in practice if the proposed allocation is adopted. The representation summarises our support for the principle of retaining an aviation facility on the site before explaining the amendments to the policy that are sought to ensure that the policy is robust. The representation is supported by an appendix which contains an updated version of the representation made on the Council's Local Plan Consultation Document (January 2015) that provides detail of our support for retaining an aviation facility suitable for air sports.

Support for the Principle of a Realigned Runway

Our support for the principle of retaining an aviation facility at Panshanger suitable for air sports is based on the following:

- 1 **Strategic Importance for Air Sports** : Panshanger Aerodrome is of strategic importance for air sports, especially light aircraft flying, for the reasons set out in the appendix. The realignment of the runway would provide the opportunity for this facility to be secured over a long term period.
- 2 **Scarcity of General Aviation Airfields in the Region** : The number of general aviation (GA) airfields and aviation centres (which provide air sports opportunities) close to London has reduced significantly in recent years due to a combination of economic pressures, various aviation constraints designed to ease the operation of the four international airports and demand for other uses. The existing GA airfield network operates under increasingly complicated restrictions that could progressively force the aviation community further away from the south east if a sustainable airfield network is not maintained. Panshanger is a prime example of a GA airfield in a key location within this network, being positioned in the middle of a north/south corridor between Luton and Stansted. Its location between the Zones of these international airports makes it an ideal facility for aircraft of all types transiting north or south through the gap. Panshanger is one of only two potentially operational GA airfields in Hertfordshire. Operations at Elstree have been increasingly curtailed by air safety considerations relating to Heathrow that restrict pilot training and visitor accessibility. Panshanger is not subject to the same pressures being 18 miles north of Elstree and clear of Heathrow's zone and therefore offers more flexibility to meet aviation needs.
- 3 **Economic, Community & Environmental Role** : The aerodrome offers the potential to play an important local economic role for the reasons set out in the appendix. Furthermore, the airfield offers the potential for a community facility both in terms of aviation and as a focal point for community activities. For example, supporting facilities such as function rooms, meeting rooms, cafes etc can be used for a range of community activities and events when not required for supporting the principal aviation use and if a co-ordinated and integrated approach was taken with the wider mixed use development that is proposed for the site, this could reduce the need for additional community facilities to be provided on-site to support the residential development. It is also an environmental amenity as the airfield area has not been subject to changes in agricultural practices for over 70 years and therefore the flora and fauna characteristics may be locally significant.

Policy and Masterplan Changes

Sport England's preference would have been to retain the existing airfield layout rather than realigning the runway and relocating the supporting facilities as this would have offered greater certainty in terms of the practical and financial feasibility of delivering a new aviation facility on the site. However, it is acknowledged that if a residential allocation is to be made on this site as an extension to the existing Panshanger neighbourhood, then the site of the existing airfield would need to be used for practical and planning reasons. If retaining the existing airfield is not possible, the principle of a realigned

runway to enable optimal use to be made of the entire site would be fully supported provided that this can be demonstrated as being feasible and deliverable in practice.

The use of a masterplan to provide a planning framework for this complex mixed use development is supported and considered to be essential in the context of the scale of the development, the range of uses to be accommodated and the constraints of the site. However, the only guidance that Policy SP18 currently provides on the realigned runway is that the masterplan will allow an opportunity for it to the north of the Green Belt boundary. In its current form, this is not considered to provide an adequate policy framework for guiding the masterplan in view of the complexities associated with aviation facility planning. To date, the policy has not been informed or supported by the relevant feasibility work to guide and co-ordinate the usage of the various elements of the site. It is fundamental to the strategic planning of the allocation that the policy wording specifically requires an undertaking to complete all the feasibility work listed below.

Vision

The vision of general aviation and air sports stakeholders is for a revitalised aviation facility at Panshanger offering services commensurate with the constraints of the site. These could include sports & leisure aviation, pilot training, air transport, aircraft maintenance & engineer training, community facilities, hangar homes and aircraft parking. Furthermore, integration with the adjacent residential led development would offer opportunities to provide community and educational facilities and activities that will benefit the wider community as well as the principal users of the aviation facility. It is essential that consideration is given at an early stage to how a new aviation facility could contribute to the delivery of a sustainable new residential community. It should not be treated as a standalone facility that is planned in isolation from the adjoining community.

This concept would inform options for developing the new airfield as well as assessing the feasibility of any aviation facility. Policy SP18 should therefore be amended to specifically require the vision and opportunities identified above to be accounted for in the masterplanning.

Feasibility

The policy should also require the following more specific matters to be addressed through feasibility work in order to inform and support the masterplan:

- 1 The extent of the site required for a realigned runway including supporting infrastructure informed by aviation considerations such as alignment, safeguarding and topography;
- 2 The groundworks required to deliver realignment and supporting infrastructure accounting for planning, environmental and financial considerations;
- 3 The siting of hangars, fuel supplies, maintenance facilities, social facilities and vehicular access in response to planning, highway and financial considerations
- 4 The financial viability of delivering the capital works to realign the runway, adding supporting infrastructure and providing a service road spur to give vehicular access incorporating mains services, water and power. The extent to which some or all of this could be funded by potential airfield operators and the need for developer contributions secured through a section 106 agreement will also need to be considered.

The masterplan should account for all of the above matters to ensure that opportunities for creating a revitalised and sustainable aviation and community facility are fully considered and to ensure that the necessary technical and financial viability considerations are considered and addressed at an early stage. This will help ensure that the concept of a mixed use development incorporating a feasible aviation facility is deliverable within the constraints of the site and help ensure that the mixed use development does not prejudice the potential aviation facility and vice versa.

Delivery

Policy SP18 needs to stipulate that the masterplan for the whole site allocation will enable the co-ordinated delivery of both residential and aviation developments simultaneously and ensure that the delivery of a viable airfield scheme is not unnecessarily delayed or prevented. In particular, the policy should:

- 1 Require the masterplan to set out the principles relating to ownership or security of tenure for potential airfield operators, marketing of the airfield site and any phasing requirements to avoid delays in the delivering the airfield element of the site;
- 2 Following completion of the feasibility, confirm that the Master Plan should allocate the relevant part of the of the site for the runway and supporting infrastructure that comprise the proposed

aviation facility to provide certainty to all stakeholders and ensure delivery is not prejudiced by other proposed land uses.

Sport England would welcome continued discussions with the Council in relation to the issues raised in this representation with a view to reaching mutually agreeable solutions. We, together with the GAAC and the LAA, would also wish to support the Council by providing advice on the feasibility work as it evolves.

Appendix

The following comments are made in support of Sport England's representations on policy SP18 and explain the importance of Panshanger Aerodrome as an air sports facility and general aviation airfield in order to justify the need for a realigned runway and supporting facilities to be provided as part of a masterplan for this site.

Strategically Important Air Sports Facility

Panshanger Aerodrome is considered to be a strategically important site for air sports. The aerodrome has a 975 metre grass runway orientated to align closely to the prevailing wind and to avoid conflict with the commercially controlled air space to the north and south. The aerodrome provides several grass taxiways, aircraft parking, hangars and clubhouse facilities. The airfield is capable of accommodating most types of light single and twin engine propeller light aircraft. Before it was closed by the landowner in 2014, the aerodrome was used extensively for light aircraft flying which is an air sport recognised by Sport England and the sport has a recognised national governing body, the Light Aircraft Association (LAA) - see Sport England's website for confirmation <https://www.sportengland.org/our-work/national-governing-bodies/sports-that-we-recognise/>.

Panshanger is one of only three aerodromes suitable for sport and leisure in the limited air space to the north of London between the London Heathrow and the Luton/Stansted air space areas. All aerodromes in this area are heavily utilised for light aircraft as they serve the heavily populated catchment of London and the surrounding counties to the north. All of the operational aerodromes are operating at capacity in terms of the number of aircraft that they can accommodate and there is an acute shortage of light aircraft parking across the south of England. The closest comparable aerodromes at Elstree, Denham, Old Warden and North Weald are unable to accommodate (and will not be able to accommodate) address displaced activity following Panshanger's closure plus are unsuitable in terms of capacity, quality and suitability of facilities, management etc.

As other aerodromes in the region are at capacity, the permanent loss of the aerodrome would result in the loss of the light aircraft uses on this site which would reduce opportunities for participation in air sports in the Welwyn Hatfield area (over 20% of the users of the airfield when it was last operational resided in the Welwyn Hatfield area) as well as the wider region.

Panshanger is considered to be of strategic importance for air sports (at least regionally important) for the following reasons:

- 1 The aerodrome was, until it closed, the home of the established North London Flying School, which provided individual and group pilot training, aircraft hire, aircraft maintenance and other services to support all levels of air sports;
- 2 The aerodrome had a significant volume of aircraft movements (over 18,500 in 2013), the majority of which were sport and recreation related. The site accommodated 40+ aircraft;
- 3 The site has one of the most suitable grass runways in the country for use throughout the year. Many grass runways at general aviation airfields are prone to waterlogging in the winter, but the runway at Panshanger is unusual in that it has a gravel base and is slightly raised above the surrounding terrain which avoids it becoming flooded or waterlogged. This makes the runway at Panshanger a significant asset to the general aviation community in the region as it provides pilots with confidence due to its usability at all times of the year;
- 1 The site was a venue for regular events such as regional aerobatic competitions;
- 2 The location provides a safe area of operation for light aircraft in one of the most congested areas of air space in the UK. There is a scarcity of light aircraft training and parking facilities in the region which the aerodrome (when operational) made a significant contribution towards addressing. The closure of the aerodrome in 2014 has aggravated the situation as there is no capacity at the nearest alternative sites and many former Panshanger users have not found alternatives;

- 3 Panshanger is important to the heritage of air sports as the site has been used for civilian light aircraft since the 1940s and the runway is particularly suitable for vintage and other aircraft which have a tail wheel configuration of undercarriage;
- 4 The site is considered to be of significant regional importance to the Light Aircraft Association and the General Aviation Awareness Council (GAAC), the UK's representative body for General Aviation on planning and environmental issues.

Since 2014, Sport England has been working with the LAA to identify potential Significant Area for Sport (SASP) in England for air sports. SASPs are identified by Sport England in consultation with sports national governing bodies in order to recognise and raise awareness of the most important sites for sport in the country. This recognition is considered helpful when considering proposals for enhancing and promoting such sites, but is also important for assisting with safeguarding them. Further details of SASPs are on Sport England's website at

<https://www.sportengland.org/facilities-planning/planning-for-sport/planning-tools-and-guidance/significant-areas-for-sport/>.

The nationwide process of identifying and confirming SASPs for air sports has not yet been completed. The LAA are aiming to complete the identification of potential sites for consideration by Sport England by the end of 2016 with a view to the process being completed and SASPs being confirmed by Spring 2017. Based on our initial assessment of Panshanger Aerodrome against SASP criteria, Sport England considers that the site is of at least regional importance to air sports and therefore offers strong potential to be confirmed as at least a regional SASP when the SASP identification process has been completed. Sport England would therefore advocate that the strategic importance of the site for sports aviation and its potential for regional SASP status be afforded weight in justifying the need for a realigned runway to be provided as part of a masterplan for the site. Sport England will confirm the status of the site to the Council when the SASP process has been completed.

Economic Importance

In addition to the importance of the site for sport, the aerodrome also has a significant economic role. The economic role of the airfield in terms of employment, economic value, community and business benefits is set out in separate representations made by the GAAC. Substantial evidence about the economic importance of the aerodrome to the local and regional area has been provided in a report prepared by York Aviation for Panshanger People (The Economic Impact of Panshanger Aerodrome – August 2014) and in a report prepared by North London Flying School (Panshanger Aerodrome & North London Flying School – April 2014). The GAAC have advised that the Aerodrome is potentially economically viable to reopen in the future and that strong demand would exist for aviation businesses similar to North London Flying School to continue to operate from the site. It should be emphasised that aviation operations ceased in 2014 because North London Flying School's lease of the site was not renewed rather than because the site was not viable as a business. The site would still be expected to be operational if the lease had not ended.

Planning Policy

Government planning policy seeks to safeguard aviation sites such as Panshanger for their importance for meeting a range of needs. In particular, the National Planning Policy Framework (NPPF) advises:

- 1 Paragraph 33: "*When planning for ports, airports and airfields that are not subject to a separate national policy statement, plans should consider their growth and role in serving business, leisure, training and emergency service needs. Plans should take account of this Framework as well as the principles set out in the relevant national policy statements and the Government Framework for UK Aviation.*"
- 1 Paragraph 70: In summary, it advises that to deliver the social, recreational and cultural facilities/services the community needs, planning policies should plan positively for the provision of sports and community venues and guard against the unnecessary loss of valued facilities and services.
- 1 Paragraph 74: In summary, it advises that existing sports and recreational buildings and land should not be built on unless an assessment has been undertaken which has shown it to be surplus to requirements or replacement provision is made.

If the policy did not make provision for a realigned runway and supporting infrastructure, the loss of the aerodrome would be considered contrary to all of the above Government policy. It would also be contrary Sport England's Planning for Sport Aims and Objectives (2014) guide which is used for informing responses to local plan policies and planning applications. In particular, the proposal would be contrary to Objective 1 which seeks to prevent the loss of sports facilities and land along with access

to natural resources used for sport. This guide is on our website at <http://www.sportengland.org/facilities-planning/planning-for-sport/aims-and-objectives/>

Airfield Status Advice

The Housing and Planning Act became law in May 2016. While it has limited effect to date, the new Housing & Planning Minister has given one recent response to a direct question in relation to the status of airfields and this is attached to this response as an appendix. The Minister of State for Housing and Planning, Gavin Barwell, has responded to a letter from Mr Nick Hurd MP on the subject of designating airfields as “Brownfield” with the attendant presumption that they are suitable for residential development. In summary, the letter confirms that airfields are not ‘designated’, they are ‘described’ as brownfield and that no such presumption applies to redevelopment of all of the land within the curtilage of a brownfield site. The letter also acknowledges the ongoing aviation needs that airfields meet and the importance that the Government gives to maintaining a national network of airfields through the Aviation Policy Framework . This adds further weight to the case for safeguarding Panshanger through making provision for an aviation facility as part of the master plan for the site.

Closure of the Aerodrome

Sport England would wish to emphasise that the closure of the aerodrome in 2014 does not alter our position on the proposal. While acknowledging that the site is not currently in aviation use, the site should be safeguarded for meeting current and future general aviation needs including air sports through realigning the runway for the reasons set out above. It has not been demonstrated that the site could not be brought back into viable aviation use if reopened and as set out above, North London Flying School’s use of the site only ceased because their lease was not renewed and no attempts have been made by the landowner to get the site back into aviation use. The lawful use of the site in planning terms, as confirmed by the Council, is an airfield and the site has been in continuous civilian airfield use between 1953 and 2014. The recent closure should therefore not have any influence over the need to safeguard the site through realigning the runway.

Precedents

A number of general aviation airfields around the country have come under threat from various developments in recent years e.g. Enstone, Old Sarum and Rochester. However, these sites have been safeguarded or have been planned with the sites partially developed to enable the retention of aviation use. Detail of these cases have already been provided by the GAAC. These precedents demonstrate that the value placed on the role of airfields in terms of general aviation, air sports and community leisure has been accounted for in line with Government planning policy when similar proposals have been considered elsewhere. They also demonstrate that if a strategic approach is taken development such as residential can be planned to co-exist with the retention or re-provision of airfield facilities and that in some cases enabling development can be positive for enhancing and sustaining the airfield facilities. These precedents add further weight to the case for the masterplan to provide for a mixed use development including a realigned runway.

Conclusion

The principle of realigning the runway as part of the masterplan for the site is supported due to Panshanger Aerodrome’s past and potential role as a strategically important site for air sports as well as its importance to the local economy. The loss of the aerodrome would be contrary to Government planning policy relating to airfields and sports facilities and its recent closure should not be given any weight in relation to the need to safeguard the site through realigning the runway and re-providing supporting infrastructure.

[Gavin Barwell MP letter 20160822](#)

6

Please set out the changes you consider necessary to make the draft Local Plan legally compliant or sound including revised wording of any policy or text. Be as precise as possible. (Please note that any non-compliance with the Duty to Co-operate cannot be rectified at the examination). You will

need to say why the change will make the draft Local Plan legally compliant or sound. (Attach supporting documents if necessary).

See above comments relating to changes to policy.

7

If your representation is seeking a change, do you consider it necessary to take part and speak at the examination hearing? Yes, I wish to take part in the examination hearing, if invited to do so by the Inspector

8

If you wish to take part in the examination hearing, please outline why you consider this to be necessary:

To provide specialist advice on sports facility planning matters to the Inspector and other parties.

9

Do you wish to be notified of any of the following:

We welcome your comments on our consultation - would you like to complete our short feedback form? (If submitting more than one comment, please complete the feedback form once only.) No

How did you hear about this consultation?