

WELWYN HATFIELD LOCAL PLAN (2013-32)- EXAMINATION

STAGE 3 HEARING STATEMENT PREPARED BY SPORT ENGLAND:

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

Sport England is a non-departmental public body which leads on the delivery of the Government's community sports strategy and represents the interests of community sport through the planning system. Further detail of our work and the organisation can be found on our website <https://www.sportengland.org/our-work/>.

In relation to question 25, appropriate consideration should also be given to the separate hearing statement prepared by the General Aviation Awareness Council (GAAC) which represents air sports & gliding together with governing bodies (such as the Light Aircraft Association (LAA), the national governing body for light aircraft flying) and the Aircraft Owners and Pilots Association (AOPA) on aviation planning matters. Sport England works in partnership with the GAAC on planning matters concerning aviation facilities that are used for air sports. GAAC's hearing statement has been prepared to complement Sport England's and both bodies will be appearing at the hearing to jointly represent the interests of air sports.

NPPF Paragraph 28

Paragraph 28 of the NPPF broadly seeks to protect and develop local businesses, services and facilities in rural areas in order to support economic growth. Such businesses would include general aviation related employment uses while an airfield that was used for air sports should also be considered as a sports venue that would offer economic and leisure related benefits.

Further detail of the economic value of the airfield in the context of its rural location is set out in the GAAC hearing statement. Substantial evidence about the economic importance of the aerodrome to the local and regional area has also been provided in a report prepared by York Aviation for Save Panshanger Airfield (The Economic Impact of Panshanger Aerodrome – August 2014 <http://www.savepanshanger.co.uk/wp/campaign/>) and in a report prepared by North London Flying School (Panshanger Aerodrome & North London Flying School – April 2014 – examination library document OSC 6F). The GAAC has advised that the airfield 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.

In summary, the re-establishment of the airfield would allow aviation related businesses to thrive as they have in the past which would be consistent with the aims of paragraph 28 of the NPPF. Its permanent loss would therefore be contrary to this part of the NPPF.

NPPF Paragraph 70

Paragraph 70 seeks to guard against the unnecessary loss of valued community facilities and services (these are defined to include sports venues). Again, an airfield which was used by the community for air sports should be considered as a sports venue. The discipline of popular flying (light aircraft) is defined as a recognised air sport (see Sport England's website for more detail on the sports that we recognise <https://www.sportengland.org/our-work/national-governing-bodies/sports-that-we-recognise/>) by Sport England and therefore airfield facilities that are used for such sports would be defined as sports venues.

Panshanger airfield has been an important part of the local and wider community for many years and could continue to contribute to an expanded community in the future. The reasons why Panshanger airfield has played (and offers potential to do so in the future) an important economic and community sports role are already set out in detail in Sport England's representations on Policy SP18 of the Pre-Submission Consultation. As well as the economic role referred to above, the airfield is of strategic importance for air sports, especially light aircraft flying, for the reasons set out in our pre-submission representation, especially its physical characteristics, the scarcity of comparable airfields in the air space north of London and the lack of capacity and/or suitability of other airfields in the region. The potential realignment of the runway would provide the opportunity for this facility to be secured over a long term period. While information on the availability of facilities at other general aviation aerodromes is difficult to access due to commercial sensitivities, we understand from the GAAC that hangarage and open parking at Elstree airfield, one of the closest airfields to Panshanger, is now fully utilised, which represents a worsening of the situation since 2014. Furthermore, aircraft movements from this airfield have increased to the point where flying training is being restricted to reduce congested airspace in the interests of safety. The shortage of hangarage has also become increasingly acute in recent years as insurance companies prefer aircraft being housed in secure hangars to address security issues.

An assessment of the regional importance of Panshanger airfield prepared by the Light Aircraft Association against Sport England's criteria for assessing regionally important sports facilities that was undertaken before operations on the airfield ceased is appended as Appendix 1. It should be noted that while Panshanger airfield had a regional catchment, over 20% of the users of the airfield when it was last operational resided in the Welwyn Hatfield area so it was significant to the local as well as the wider aviation community.

As the airfield is a valued community facility its loss would be considered contrary to paragraph 70 of the NPPF.

NPPF Paragraph 74

Paragraph 74 seeks to protect existing sports buildings and land unless specific criteria can be met. In relation to the first criterion in paragraph 74 of the NPPF, it has not been demonstrated through a robust assessment that the airfield is surplus to requirements in terms of meeting community air sports needs as set out in detail in our previous representations. This is evidenced by the widespread support for its retention and, the lack of evidence that other airfields north of London have the capacity and suitability to meet the air sports and wider aviation needs that Panshanger could accommodate.

In relation to the second criterion with regard to the airfield being replaced by equivalent or better provision, the Council's proposal to potentially replace the airfield through providing the opportunity to realign the runway to the north of the Green Belt boundary as proposed in policy SP18 is welcomed in principle and it is expected that this will be discussed at stage 4 of the examination in the context of the proposed site allocation. However, as set out in our previous representations, this could only be supported if the local plan was modified to ensure that a feasible airfield could be delivered in practice. To date, the local plan has not been informed or supported by published feasibility work to assess whether replacement airfield facilities could feasibly be accommodated in the context of the practical, land ownership and financial constraints that exist. To address these matters, a site for a replacement airfield including realigned runway and supporting infrastructure needs to be made available in the local plan, which must be co-ordinated with the related residential allocation on the existing airfield (allocation SDS1(WGC4)).

The masterplan for the site will also need to co-ordinate the delivery of both residential and aviation development and ensure that the delivery of a viable airfield scheme is not unnecessarily delayed or prevented. Sport England would be concerned if separate, unco-ordinated, proposals came forward for the residential site allocation in advance of the feasibility and delivery of a replacement airfield being adequately considered.

Policy SADM7 of the submitted Local Plan is relevant to the consideration of question 25 as it essentially represents the Council's local plan policy for implementing paragraphs 70 and 74 of the NPPF. In summary, the policy sets out how applications relating to the loss or change of use of community facilities will be considered.

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. As set out above, there is clear evidence of demand for its use for air sports up until the airfield was closed and evidence of the lack of capacity at alternative facilities in the region since it closed. There has also been expressions from a range of parties interested in bringing the airfield back into use if the opportunity was made available for this.

The second provision of the policy in summary requires the availability of an alternative facility. As set out above, there are no other airfields in the local area and other airfields in the region are either operating at capacity or not comparable to Panshanger in terms of their suitability for the air sports that it accommodated.

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. Notwithstanding the potential realignment of the runway on adjoining land, no feasible alternative is currently being proposed on the site or in the vicinity.

Consequently, the potential loss of the airfield would not meet the criteria in Policy SADM7 as well as paragraph 74 of the NPPF.

Other NPPF Considerations

In addition to the three paragraphs referred to in the question, Sport England would respectfully request that the Inspector's attention is drawn to paragraph 33 of the NPPF which advises that when planning for airfields, plans should consider their growth and role in serving business, leisure, training and emergency service needs and that such plans should

take account of the Framework as well as the principles set out in the relevant national policy statements and the Government Framework for UK Aviation. As set out in previous representations made by Sport England and the GAAC, the retention of Panshanger airfield offers the potential to play a key role in meeting such needs. While the proposal in Policy SP18 of the local plan to potentially realign the runway gives some recognition of the airfield's role, in its current form the local plan does not adequately account for the role of Panshanger in meeting the range needs identified in paragraph 33 due to the lack of certainty that a replacement facility could feasibly be delivered in practice. The expected discussion at the examination on policy SP18 must ensure that this matter is accounted for to enable a relocated airfield to operate alongside the planned new housing.

As set out in the GAAC's hearing statement, there have been a number of recent appeal decisions relating to Manston Airfield in Kent, where proposals for non-aviation use of this airfield were dismissed. In this case, the Inspector drew on the provisions of Paragraph 33 of the NPPF and took the view that proposals that would prejudice the airfield would not accord with this element of the NPPF.

Conclusion

In summary, the potential loss of Panshanger airfield would not accord with paragraphs 28, 33, 70 and 74 of the NPPF. Unless provision was made in the local plan for a feasible replacement facility through the site allocation policy (SP18) for the site covering Panshanger, the plan would not meet the test of soundness relating to being justified and consistent with national policy for the reasons set out in this statement and previous representations.

Roy Warren
Planning Manager
Sport England
0207 273 1831
Roy.warren@sportengland.org

Sport Park, 3 Oakwood Drive, Loughborough, Leics, LE11 3QF

25th January 2018