

Annex B to
LAA Letter 20130124 Panshanger Aerodrome
Dated 24 Jan 2013

Welwyn Hatfield Local Plan 2012 – Panshanger Aerodrome
Detailed Response by the Light Aircraft Association

Land for Housing outside Urban Areas: WGC4 – Panshanger Aerodrome.

You ask for views on whether site identified for housing development would be the most suitable. As Panshanger Aerodrome is an "airfield" as described in the NPPF you must have regard for paragraph 33 on page 10 where it says:

*When planning for ports, airports and **airfields** that are not subject to a separate national policy statement, plans should take account of 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."*

Your proposal does not seem to have taken this into account as it ignores the current use of the land for business, transport, sport and leisure purposes. Clearly, identifying the site for housing would destroy these facilities which cannot be replaced within the Welwyn/Hatfield area nor could they be relocated anywhere in the adjacent areas. There are only 3 other sport and leisure aerodromes in the band between the London Heathrow controlled airspace to the South and the airspace serving Luton and Stansted to the North. All these sport leisure aerodromes are heavily utilised and none has the capacity to take additional aircraft – we are presently surveying this aerodrome capacity in detail and will be able to support our assertion with specific data in the near future. If Panshanger Aerodrome were to be lost the nearest area in which an alternative site could conceivably be established would be well to the north of the Luton/Stansted control zones. This would mean that there would be nothing practicable within reach of the huge population base of Greater London and the surrounding areas to the north. Moreover, establishing a new aerodrome would present planning and financial challenges that are likely to be insurmountable.

In short the sports and leisure facilities provided at Panshanger are irreplaceable. This is relevant to UN General Assembly Resolution 42/187 on sustainable development which is called up in the NPPF requiring sustainable development as

"meeting the needs of the present without compromising the ability of future generations to meet their own needs".

By removing this sport, leisure, business and employment facility, the only such facility in your area, the Council would have failed to take proper account of this part of the NPPF. The planned closure of the aerodrome would compromise future generations' needs for the facilities currently enjoyed at this aerodrome, facilities that the Core Strategy does not recognise in any way when describing the characteristics of the existing land use.

We believe you must address this requirement of the NPPF by removing WGC4 - Panshanger from the Core Strategy.

Sustainability Appraisal

The NPPF quotes 3 elements of sustainability on Page 2 and two of these are relevant to Panshanger Aerodrome within the Local Plan. They are:

An economic role – contributing to building a strong, responsive and competitive economy, by ensuring that sufficient land of the right type is available in the right places and at the right time to support growth and innovation; and by identifying and coordinating development requirements, including the provision of infrastructure

An environmental role – contributing to protecting and enhancing our natural, built and historic environment; and, as part of this, helping to improve biodiversity, use natural resources prudently, minimise waste and pollution, and mitigate and adapt to climate change including moving to a low carbon economy.

Panshanger Aerodrome has a role to play in meeting the sustainability requirements in the Core Strategy. It has an economic role in providing a sports and leisure facility with employment opportunities not available elsewhere in the area and this is not mentioned in the policy. It is a managed green space akin to a sports pitch for air sports as well as providing a diverse habitat that is protected from intrusion by the very nature of an aerodrome.

The Environmental Appraisal paragraph 10.22 Community Services and Facilities says that: "***We will seek to ensure that our communities are well served by a range of community services and facilities***" but Panshanger aerodrome is such a facility and the Core Strategy ignores its value completely. Your own policy requires you to take this into account and you must do so here.

The Appraisal goes on to say that you "***will, through the relevant DPDs, SPDs, master-plans and development briefs:***

*Guard against the **loss of existing community facilities**;*

*Allow for the expansion and / or **enhancement of existing community facilities** to assist continuing viability, where this may be an issue, particularly in areas where new development will increase the demand for facilities"*

Again the Core Strategy does not do what you said it would do in respect of Panshanger Aerodrome and its facilities. You must now guard against the loss of this community facility by removing it from the WGC4 proposal for housing development.

Policy CS5 at para 8.16 says that "***Sport and recreation facilities form an important subset of community facilities and services and have particular significance for enabling people to live healthy, active lifestyles, as well as giving young people things to do and encouraging community cohesion***" but the Core

Strategy fails to recognise or mention the sport and recreational facilities provided by Panshanger Aerodrome. You must comply with your own policies by taking this into account and removing WGC4.

Furthermore your **Policy CS6** supports community and sports facilities and in particular you say you "**will guard against the loss of existing community facilities**" but in your proposal for WGC4 you do the opposite. We will not reprint the whole of CS6 here but you must recognise that the whole of this policy supports the retention of Panshanger aerodrome. We strongly recommend that proposal WGC4 is removed in order to be consistent with the policy.

We note in para 8.28 that "**the council will work withSport England ... and National Governing Bodies (for sports)**" The LAA is a national governing body for air sports and stands ready to work with you to further develop this sports facility. We cannot stand by whilst it is destroyed by planning policy which does not take proper account of the existing facilities. We request you delete the proposal WGC4.

Most importantly your Sustainability Appraisal says in relation to Policy CS6 that: "**10.29 No significant negative or uncertain effects are predicted from this policy**". You will recognise that this last statement on which the Council's policy is based is not true in respect of the policy proposal WGC4. We believe the sustainability policy is excellent but to comply with it WGC4 must recognise the use of the land for sport, leisure, industry and employment and take account of the loss of facilities that would result if it were implemented. This element of the Sustainability Appraisal is incorrect and must be discounted. If you intend to pursue policy WGC4 you must state the negative effect on sustainability and take this into account in your final plan.

The Sustainability Appraisal also needs to be amended.

NPPF Requirement for a Prosperous Economy

In paragraph 28 on page 9 The NPPF states that planning policies should support economic growth and the expansion of all types of businesses and

"should promote the retention and development of local services, community facilities and sports venues",

Clearly Panshanger Aerodrome provides all these functions but the Sustainability Appraisal, the Housing Strategy and the Emerging Core Strategy all dismiss and ignore that.

The Council, under their plans to close Panshanger Aerodrome would prevent economic growth of the aerodrome and the businesses and activities it supports. The town of Welwyn and the surrounding district would lose a community facility and sports venue. London and the south east of England would lose a significant sports facility which is almost impossible to replace. Because of the pressure on light aviation aerodromes in the south-east, Panshanger has "a special uniqueness to an area and cannot easily be replaced". See below for the specific meaning of this.

The aviation businesses currently in operation on the aerodrome should be encouraged by the council rather than destroyed

Sport Facilities - NPPF and Sport England Requirements

The Strategy does not note that Panshanger is a facility for Air Sports that are recognised by Sport England which places a number of planning requirements on councils. We are aware that you have consulted Sport England and they intend to respond. As Panshanger Aerodrome is a sports facility the plan should take account of a number of issues which have been omitted.

This policy clarification from Sport England is relevant:

Whilst the NPPF makes specific reference to sport, recreation and open space in a number of paragraphs, Sport England considers that all references within the NPPF to community and/or social infrastructure, land and facilities also includes these uses.

Sport England also tells us that where a facility has "a special uniqueness to an area and cannot easily be replaced" it should be protected. Closing Panshanger Aerodrome would remove the aviation sports facilities available to local communities as well as removing an important national asset that particularly serves North London and it cannot be replaced as all other facilities in the south-east are at capacity. There is an acute shortage of light aircraft parking in the South of England so this facility has particular regional as well as local importance. It would be almost impossible to relocate the facilities provided by Panshanger Aerodrome.

The NPPF on Page 18 paragraph 74 states:

74. Existing open space, sports and recreational buildings and land, including playing fields, 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; or*
- *The loss resulting from the proposed development would be replaced by equivalent or better provision in terms of quantity and quality in a suitable location; or*
- *The development is for alternative sports and recreational provision, the needs for which clearly outweigh the loss.*

The Local Plan and Core Strategy have not taken these requirements into account nor identified alternative facilities. We understand that the Council is obliged to do so and we believe that if having done so it continues with this policy it must identify, in its Local Plan, an equivalent or better provision in the form of a new aerodrome.

European Policy – An Agenda for a Sustainable Future in General Aviation

We would like to draw your attention to the European Parliament Special Resolution of 3 Feb 09 on a Sustainable Future for General Aviation which, whilst

it is not mandatory for councils, has received support and recognition from the Department for Transport. In particular we believe the Council should have regard for the following extracts:

The European Parliament having regard to the communication from the Commission of 11 January 2007 entitled "Agenda for Sustainable Future in General and Business Aviation:

13. **Encourages** Member States and regional and **local authorities** to **invest** in the modernisation and establishment of **small** and medium-sized **airports, which are of major importance for General and Business Aviation;**
14. Encourages the Member States to **invest in specific infrastructure** necessary for the operation and stationing of aircraft in the field of General and Business Aviation;
15. **Encourages** Member States, as well as regional and **local authorities**, to involve all interested parties in consultation processes with a view to dedicating, where appropriate, potential or **existing airports** for use specifically by General and Business Aviation
32. **Considers as essential the promotion of recreational and sport aviation**, as well as of European aero clubs, which constitute an important source of professional skills for the entire aviation sector;
33. **Calls on the Commission to take account of the important role that this aviation sector plays and can continue to play** in the development of vocational training for pilots

Aviation Policy Framework

Whilst the UK Aviation Framework Policy is still in draft it will be adopted into law soon and the Local Plan should therefore have regard to its provisions. The NPPF at para 33 page 10 requires local authorities to do this. The Aviation Framework identifies important infrastructure requirements related to aerodromes which include the paragraph:

Safeguarding

6.6 The NPPF makes clear that **local planning authorities should "identify and protect** where there is robust evidence, sites and routes which could be critical in developing infrastructure to widen choice. **This could apply to airport infrastructure."**

If it is to protect this infrastructure the council must remove policy WGC4 from the Plan and Strategy.

Infrastructure Requirements – Section 13 and Policy CS-12

In section 13 of the Core Strategy Document at para 13.1 the Council says that in order for communities to be successful, it is vital that they are well served by a range of infrastructure. Paragraph 13.2 goes on to say that this infrastructure encompasses a wide range of services provided by both public and private sector agencies. This must recognise the aviation infrastructure facility at Panshanger which is the only such facility in the Council's area and is one of only 2 licensed aerodromes in Hertfordshire. Section 13.3 of the Local Plan places infrastructure into 3 groups:

Bullet point 1, lists transport infrastructure

Bullet point 2 mentions sports, recreation and community facilities

Bullet point 3 mentions "Green Infrastructure".

But in developing these groups the Plan and Strategy fail to mention the existing asset of Panshanger Aerodrome and its facilities. The Infrastructure document ignores Panshanger Aerodrome which is relevant to all 3 infrastructure groups. We believe that these infrastructure issues should be revisited and the importance of Panshanger Aerodrome taken into consideration.

The NPPF at page 9 Paragraph 29 indicates *the need for people to have a real choice about how to travel*; and this should include by light aircraft. The Council should be promoting Panshanger Aerodrome as an asset, not ignoring its use and potential.

Protection of Critical Assets - Section 12 & Policy CS 11

In Section 12 and Policy CS11, paragraph 12.2 refers to the green spaces, natural elements and the multi-functional uses of these spaces. The aerodrome at Panshanger is not just a series of aviation related businesses but also a large green open space that allows the sport of flying and many other local activities to take place. It is also the habitat of many species of wild flora and fauna. Something not recognised by the Strategy. This should be revisited and taken into account by the Strategy

Policy CS 11 on the same page covers protection of critical assets. It says the Council is *"committed to protecting and enhancing the borough's natural and historic environment"*. It goes further by stating that *"any loss or damage to the value of these assets will be resisted and opportunities for enhancement will be supported"*. This is clearly the opposite to the loss and damage that will be done if the aerodrome is allowed to be closed. According to this policy the aerodrome should be *"protected and enhanced"* and we look to the Council to implement that policy here by removing Policy WGC4.

Paragraph 12.11 states quite clearly that access to the sports pitches are essential for the creation of sustainable communities. The potential closure of the sporting facility of Panshanger Aerodrome, along with all its wildlife and unspoilt green areas, would be in contradiction to this policy; the closure of the aerodrome should be removed from the plan.

Community Services and Facilities- Section 8 & Policy CS 6

In Section 8 of the Strategy Policy CS says the council will:

"guard against the loss of existing community facilities and will allow the expansion or enhancement of facilities. They will promote services that serve a wider area than the local neighbourhoods or villages".

The planned closure of Panshanger Aerodrome, which meets all of these requirements, would clearly go against that policy.

The NPPF states on page 17 paragraph 70 that plans must:

Deliver the social, recreational and cultural facilities and services the community needs, planning policies and decisions should:

- **Plan positively** for the provision and use of shared space, **community facilities (such as ... sports venues,...)** and other local services to enhance the sustainability of communities ...
- **Guard** against the unnecessary loss of **valued facilities** and services
- **Ensure** that **established ... facilities and services are able to develop** and modernise in a way that is sustainable, **and retained** for the benefit of the community; and
- **Ensure** an integrated approach to considering the location of housing, economic uses and **community facilities** and services.

As a valued service providing social, recreational and sporting facilities, Panshanger Aerodrome should be encouraged rather than destroyed

Settlement strategy – Section 6 & Policy CS 3

In Section 6 at the end of the Policy CS 3 section you state that:

"Development which would result in a reduction of its services and facilities which would be to the detriment of the local community will be resisted".

However the plan to close Panshanger would destroy the very services and facilities of Panshanger Aerodrome. It is stated Council policy to resist this and the Council must do so in its Core Strategy. This should be revisited and in particular WGC4 considered against the policy.

Summary

In summary, your proposal ignores the guidance for airfields in the NPPF; it destroys a facility which would be irreplaceable within the Welwyn/Hatfield area and would be almost impossible to replace within adjacent areas. The planned

closure of Panshanger Aerodrome would compromise future generations' needs for the facilities, facilities that your strategy does not recognise in any way when describing the characteristics of the existing land use.

Panshanger Aerodrome has an economic role in providing a sports and leisure facility with employment opportunities not available elsewhere in the area; a fact that is not mentioned in the policy. It is a managed green space akin to a sports pitch for air sports as well as providing a diverse habitat that is protected from intrusion by the very nature of an aerodrome.

You recognise that sport and recreation facilities form an important subset of community facilities, but the Core Strategy fails to recognise the sport and recreational facilities provided by Panshanger Aerodrome. You say you "**will guard against the loss of existing community facilities**" but in your proposal for WGC4 you do the opposite. You also say that "**the council will work withSport England ... and National Governing Bodies (for sports)**" We are a national governing body for air sports and stand ready to work with you to further develop this sports facility.

Planning policies should support economic growth and the expansion of all types of businesses and, "**should promote the retention and development of local services, community facilities and sports venues**". Clearly Panshanger Aerodrome provides all these functions but the Sustainability Appraisal, the Housing Strategy and the Emerging Core Strategy all dismiss and ignore that.

Sport England also tells us that where a facility has "a special uniqueness to an area and cannot easily be replaced" it should be protected. Closing Panshanger Aerodrome would remove the aviation sports facilities available to local communities as well as removing an important national asset that particularly serves North London.

In Section 12 and Policy CS11, paragraph 12.2 refers to the green spaces, natural elements and the multi-functional uses of these spaces. The aerodrome at Panshanger is not just a series of aviation related businesses but also a large green open space that allows the sport of flying to take place and is also the habitat of many species of wild flora and fauna. Something not recognised by the Strategy. This should be revisited and taken into account by the Strategy

We believe you must address these points by removing WGC4 - Panshanger from the Core Strategy.