2 September 2013

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

Reference: LAA/20130902/Consultation/Aerodromes/Panshanger

Dear Ms Tiley

Welwyn Hatfield Emerging Core Strategy – Panshanger Aerodrome

Thank you for your letter RC/PE dated 30 July 2013 asking the Light Aircraft Association for further information related to Panshanger Aerodrome. The particular points were:

1. Standards for auditing the quality of airfields.

Panshanger is an aerodrome licensed by the CAA Aerodrome Standards Department in accordance with the regulations in CAP 168 which includes physical and management standards and involves on-site inspection. At attachment 1 I include an extract from CAP 168 which describes audit of management, safety and competence. I understand that Panshanger continues to hold it licence so the audit must have been satisfactory; the CAA does not publish its audit results.

Because Panshanger hosts the North London Flying School which is an Approved Training Organisation, it will also be subject to audit and inspection by the CAA Training Standards Department. Again I am not aware of public reports.

2. Assessment of the facility needs and quality audit.

In our response to the consultation we set out the results of our informal survey which showed that there was demand for air sports facilities within reach of London and that the aerodromes which cater for sport aviation were limited in number and at or close to capacity. Provision for air sports within London is not practicable so the large population looks outward for facilities suggesting that the sporting aerodromes to the north of London must satisfy the needs of about a third of the population.

The Light Aircraft Association does not oversee aerodromes directly but the CAA does and carries out substantial quality audits as described above.

3. Predicted Growth

In 2006 the CAA published a Strategic Review of General Aviation (available from the CAA Website) which included an analysis of trends in UK general aviation. The



activity of aircraft, gliders and balloons by flying hours (page vi) showed a peak of 1.5 M flight hours in the late 1980s but since then activity has been level at about 1.3M flight hours per year. The LAA's experience since 2006 has been that there has been some movement towards lighter, cheaper and more economic aircraft but overall numbers of participants has been steady with about 28,000 UK citizens holding private pilots licences for powered aircraft. In the last 2 years there has been a reported dip in activity reflecting economic change, the price of fuel and poor summers but we expect to see that recover somewhat this year. Interestingly, the economic pressures have provided the incentive to develop technologies towards lighter, quieter aircraft with more performance but lower emissions and cost; a significant change for an industry which is traditionally slow to adjust.

Our overall assessment is that UK sport aviation is developing but activity levels are holding steady and that the opportunity for growth is limited by cost and infrastructure particularly in the south east where pressures on land and airspace use are greatest.

4. Participation Levels and Targets

My notes above on growth discuss participation levels; we expect participation levels to be steady overall. The Light Aircraft Association seeks to develop participation in sport aviation through initiatives such as scholarships, aircraft sharing and marketing as well as substantial engagement with government, regulatory authorities and local authorities where we endeavour to defend air sports against the commercial and other interests which would damage it.

We do set short term and specific targets to direct our work and we have a longer term target to bring younger people into the sport but given the pressures we face in the UK and Europe we have not attempted to set long term participation targets.

5. Need for Expansion

Panshanger aerodrome could support an increase in sport aviation activity without expansion. Certainly, runway capacity and aircraft parking are not immediately limiting. Ground infrastructure might need to expand within the existing site and the semi-derelict hangar could be replaced with new buildings if a business case could be made.

I would have like to have data from Panshanger itself to support these issues but I am unable to obtain it. The aerodrome operator says it is unable to discuss the matter with me and I am given to understand by others that they may be under some contractual obligation not to divulge any such information.

6. Research Study on Alternative Options to Panshanger

You attached an extract from this report which was submitted to you during the consultation. We have not seen the original report and could not find a matching submission in the WGC4 section of the consultation website so we are unable to



review the proposition. However, reviewing the extract of the report that you provided we offer the following:

Para 2.4 says that "in principle the airfield could continue as it is". Actually there is no principle here at all; the businesses are operating successfully in a time of economic difficulty and the aerodrome is popular and has a large population base to support it.

Para 2.4 goes on to say that "existing levels of use would only allow limited investment". Whilst that is true it does not need investment "as a site for general aviation" which it is already. Clearly the threat of closure by planning decision is a blight on investment anywhere. It appears that this section of the report was phrased to belittle Panshanger Aerodrome which already has existing levels of aircraft movement significantly greater than Doncaster Sheffield and Kent International airports; see our detailed data below.

Para 2.5 to 2.8, the conclusion of the report, states that the development of Panshanger for housing would not significantly impact on the scope for general aviation in the region". It proposes that Category B or D aerodromes within reasonable proximity would provide suitable alternative provision.

Panshanger is a licensed aerodrome today supporting 40 based aircraft which with visiting aircraft generate approximately 18,700 movements per annum making it a substantial operation and on total movements on a par with Cambridge (17k), Carlisle (17k) and Durham (18k) and larger than Doncaster Sheffield (11k) and Kent International (14k). Data is extracted from CAA airport statistics 2012 available on the CAA website. In our view Panshanger is a very efficient operation for its size and relocating its businesses and traffic would not be a trivial matter.

The report offered 5 airfields which it proposes could provide alternative provision; we consider the proximity of the airfields and their capacity to absorb the Panshanger traffic. In our submission we noted that the main population base served by Panshanger is to the south and the controlled airspace of Heathrow to the South and Luton and Stansted to the North form an East/West corridor of available airspace that can serve that population. We concluded that aerodromes to the North of the Luton/Stansted airspace are too far from the population base to be relevant. We attach a chart with the aerodromes marked; the controlled airspace which is not accessible for sport aviation is outlined in blue.

Duxford

The Imperial War Museum Duxford is close to Cambridge and at 38 miles is a long way from Panshanger and even further from the population base served it serves. Duxfod airfield serves the museum but is not a public or commercial aerodrome and is only available on prior permission from the IWM. Although IWM might agree to host Panshanger activity it is too far from the population base to be an alternative.



Fowlemere

Fowlemere is a small unlicensed grass airfield with few facilities located close to Duxford and also 38 miles from Panshanger. It is also too far away making it unsuitable as an alternative to Panshanger.

North Weald

North Weald is an unlicensed aerodrome owned by the Epping Forest District Council situated within the airspace of Stansted Airport. At 20 miles from Panshanger it is closer but not close. It too is under continuous scrutiny by the EFDC for allocation to housing development; the next EFDC committee meeting to consider a change in use is scheduled for 27 Aug 13. Its future as an aerodrome is uncertain and were it to close substantial numbers of aircraft are likely to seek to relocate to Stapleford, Elstree and Panshanger.

<u>Stapleford</u>

Stapleford is a licensed aerodrome providing commercial flight training some 29 miles from Panshanger. It has capacity for additional aircraft but because the aerodrome is run as a commercial flight school, the operator has said it would not allow the relocation of an additional training business such as the North London Flying School. Because of its focus on commercial training operations it would be less suitable as a sport aviation venue than Panshanger

Elstree

Elstree is a licensed aerodrome 18 miles from Panshanger and because of reduced activity in recent years it is below capacity for aircraft and movements. Were Panshanger to be closed some of its aircraft would be likely to be accepted at Elstree but it is not well suited to sport aviation. It is location within a substantial and widespread urban area and its proximity to the Heathrow Control Zone limits the range of operations and applies restrictions on where aircraft can fly. Except for certain training, only straight in approaches are allowed with no deviation from the noise preferential route permitted. This would make it impossible for Elstree to host competitions such as the aerobatic competitions held Panshanger. We suspect that the reduction in activity at Elstree has been the result of aircraft and pilots moving away to more suitable airfields and that has perhaps been to the benefit of Panshanger which has flourished

Summary of Alternative Options

Two of the alternatives are impracticable because of distance and unsuitability. Of the closer options North Weald is 29 miles away and is under threat of closure and Stapleford would not accept the move of a flying school. Elstree has available movement capacity but its location in a dense urban area and close to the Heathrow Control Zone makes it unsuitable for sport aviation events and particularly for competitions such as are held at Panshanger.



The aerodromes available for sport and general aviation that are accessible to North London are limited and need to be preserved to provide an adequate range of infrastructure and capacity. Each aerodrome has different characteristics which taken together provide a useful sporting and training resource. Were Panshanger to be closed the availability of and access to air sports for a large population base would be diminished.

Perhaps most importantly for Welwyn-Hatfield citizens, Panshanger is a local sports resource which is visible and easily accessible, encouraging interest and participation by many who would not otherwise have the opportunity. If you remove it to a site away from Welwyn-Hatfield you will close this opportunity for "Sport for All" to your constituency.

Yours Sincerely,

John Brady Vice-Chairman

Attachments:

- 1. Extract from CAP 168 Aerodrome Licensing
- 2. Map of proposed alternatives

