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Report

Subject : Old Sarum Airfield Conservation Area Appraisal and Sustainability Appraisal
Report to : The Cabinet
Date : Wednesday 28 February 2007
Author : Elaine Milton, Principal Conservation Officer
Cabinet Member for Planning and Economic Development : Cllr Mrs Brown

Report Summary

An assessment has been carried out to determine whether Old Sarum Airfield is eligible for conservation area designation, using the guidance set out by English Heritage on Conservation Area Appraisals (2005) and against a set of criteria specifically formulated to determine whether the area has met the test of conservation area status.

The assessment has concluded that a defined area comprising the Airfield and its environs should be designated as a conservation area (see plan of proposed conservation area in Appendix 2). A sustainability appraisal has been carried out on the proposed designation, and it has concluded that the designation of a conservation area would be the most effective way of ensuring a sustainable future for the site.

A public consultation exercise has been undertaken, and the responses are summarised in Appendix 3.

In line with the approved procedure for conservation area designation, area committee Members (from both Southern and City Areas) were requested to make a recommendation along with the Planning and Economic Development Overview and Scrutiny Panel, to Cabinet, as to whether Old Sarum Airfield should be designated as a conservation area. The minutes of the area committees, and the Planning and Economic Development Overview and Scrutiny Panel are attached in Appendix 8.



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Background to the Appraisal

The council has a duty under Section 69 of the Planning (Listed Buildings and Conservation Areas) Act 1990 "from time to time to determine which parts of their area are areas of special architectural or historic interest the character or appearance of which is desirable to preserve or enhance, and shall designate those areas as conservation areas".

An assessment of Old Sarum Airfield was carried out in 2000, and following the recommendation of officers, the council's Planning Committee designated Old Sarum Airfield as a conservation area on 24 January 2001. However, Blenheim Property Company Ltd., a firm with significant property interests in the Airfield, challenged the designation in the High Court on the basis that there had been procedural errors in the designation of the conservation area which led it to be unlawful. The designation was subsequently removed on 17 December 2001.

Following the removal of the conservation area designation, the council initiated an independent inquiry to establish what went wrong, and to define parameters for any future conservation area designations or reappraisals. The inquirer, Mr William Birtles, produced a report, and this report was drawn upon to establish a set of procedures, subsequently approved by Cabinet on 18 December 2002, for the designation and reappraisal of conservation areas, including ways in which to engage the public in the process (see Appendix 9 for Procedure Note).

Cabinet also resolved at the meeting in 2002 to re-examine whether Old Sarum Airfield should be designated as a conservation area. The reappraisal was postponed until after the outcome of the Salisbury District Local Plan inquiry in 2004, when the local plan policy for the area was established. It was decided that the reappraisal should be carried out by independent consultants, and tenders were sought from conservation specialists. The contract was awarded to Atkins Heritage.

The Assessment of the Airfield

The brief given to Atkins Heritage was to carry out an independent appraisal of the area around the Airfield and to consider whether it would be appropriate to designate it as a conservation area. From their preliminary research, Atkins Heritage identified a study area. As well as undertaking historical research of the study area, part of Atkins Heritage's remit was to carry out a visual survey of the airfield and the areas around it.

The Atkins Heritage assessment followed the framework set out in English Heritage's (EH) Guidance on Conservation Area Appraisals (2005) to determine the area's eligibility for conservation area designation. The criteria that Atkins used to determine whether the area met the tests for conservation area eligibility were specially formulated for this exercise utilising the EH guidance notes, an EH thematic study of aviation sites, national Planning Policy Guidance, and the Adopted Salisbury District Local Plan (June 2003).

Officers believe that the procedure as approved by the Cabinet in December 2002 has been adhered to, and Atkins Heritage have confirmed that they have also adhered to the relevant parts of the procedure. Nevertheless, officers have taken the precaution of seeking Counsel's opinion in case of any potential legal challenge, and this opinion is reported separately under exempt business.

How the Approved Procedure was Followed

The Cabinet-approved procedure specified that a definitive list of property interests had to be drawn up where practicable. In this case, a Land Registry search was carried out in January 2005 and the results of this were used to form the basis of a database of interested parties, including owners, occupiers and mortgage companies, that the council could use when writing to seek access for survey work, and for the public consultation exercise. Where there was no available information from the Land Registry regarding particular properties, letters were hand-delivered to those properties requesting details of ownership, occupation or other interests to be provided to the council within a specified time period, and these details were also added to the council's database.

Statutory consultees (including English Heritage, English Nature (as was), the Environment Agency, and the Countryside Agency (as was)), and local amenity bodies and interest groups were also added to the database. Once the database had been compiled, letters were sent to all parties advising them of the council's

intention to reappraise the Airfield for potential conservation area designation. Access was requested for Atkins Heritage to undertake the visual survey, and this commenced in May 2005.

Summary of the Atkins Heritage Assessment

The Airfield has been identified as one of the oldest surviving active airfields in the United Kingdom. It has been in continuous use since its origins as a training station for the Royal Flying Corps in 1917, and continued to evolve and serve the Royal Air Force, the British Army and latterly, the Old Sarum Flying Club. There are three listed former World War I hangars at the airfield (listed Grade II*), plus a Grade II listed World War I workshop and Grade II listed World War I station headquarters. The airfield is mentioned in the "Thematic Survey of Military Aviation Sites and Structures" published in 2000 by English Heritage, and this puts it among the most important military airfields in the country.

Atkins Heritage has produced a report ("Old Sarum Airfield Character Appraisal and Assessment of Eligibility for Conservation Area Designation", August 2006) which can be viewed via the council's website (www.salisbury.gov.uk/planning/conservation/old-sarum-airfield.htm). The conclusion of the assessment was that because the airfield has retained much of its historic fabric, and because it is a rare, almost complete, surviving example of a World War I airfield, it has the special qualities required for it to become a conservation area.

Atkins Heritage has suggested that the boundary of the conservation area should cover the Flying Field, the WWI technical area, the remains of the Administrative Area, the Machine-gun Range, and all the surviving domestic areas dating from the 1920s to the 1960s (see Appendix 2 for a plan showing the proposed conservation area boundary).

On the basis of Atkins Heritage's recommendations, the council's head of Forward Planning and Transportation determined that the case for conservation area designation appeared to have been demonstrated, and that public consultation should be carried out in line with the approved procedure.

Public Consultation on the Atkins Heritage Assessment

A six-week public consultation exercise was held between 7 September and 19 October 2006. In accordance with the approved procedure, letters were sent to all the parties on the council's database inviting views on the proposals. CDs were enclosed with the letters containing copies of the Atkins Heritage Assessment and the Sustainability Appraisal. In addition, an advert was placed in the Salisbury Journal, press releases appeared in the Salisbury Journal and the Avon Advertiser, and site notices were erected on or around the Airfield. A dedicated web page was also set up on the council's website, which contained links to the Atkins Heritage Assessment and the Sustainability Appraisal.

A public meeting was held on 26 September 2006 at the Salisbury City Football Club, in order to enable members of the public to ask questions and provide feedback regarding the proposals.

Implications of Conservation Area Designation

A number of people at the public meeting queried what impact conservation area designation would have. The council is required, by legislation (the Planning (Listed Buildings and Conservation Areas) Act 1990), to preserve or enhance the character of each of its conservation areas, and all new proposals which affect their special character have to be considered in light of this requirement. Guidance is provided to local planning authorities for the preservation or enhancement of conservation areas by central government in Planning Policy Guidance Note 15: Planning and the Historic Environment (1994). There are policies specifically pertaining to proposals for development in conservation areas within the Adopted Salisbury District Local Plan (Policies CN8-CN12).

For development control purposes, conservation area status would be an added consideration for the local planning authority in determining planning applications within the area. Any proposals for development would have to preserve or enhance the special character or appearance of the conservation area, including views into or out of the conservation area.

Further details of the implications of designation of conservation areas can be found in Appendix 6 of this report.

Officers' Comments on the Atkins Heritage Character Assessment

In terms of methodology, Atkins Heritage established a set of criteria at the outset, based on the English Heritage guidance and adapted to suit the nature of the conservation area. The criteria were used to measure the significance of the Airfield. This seemed to be a well-reasoned approach, as no criteria had been established previously for conservation area designations. The criteria were: group value of the site, the architectural interest, the historic interest, and the potential for preservation and enhancement. Atkins Heritage have carried out a historical analysis and appraisal of the character of the Airfield, and tested their findings against the criteria. The analysis that was carried out was comprehensive, and the assessment was rigorous. Therefore, the case for conservation area status has been satisfactorily justified.

The boundary has been re-examined in the light of some of the representations received, and a robust case has been made for the inclusion or exclusion of certain pieces of land. Comments are made on individual responses in the table in Appendix 3, and the plan showing the original and amended boundaries of the proposed conservation area can be found in Appendices 1 and 2.

Officers' Comments on the Consultation Responses to the Character Assessment

A total of 324 responses were received regarding the character assessment as part of the public consultation exercise. This number is broken down as follows:

Supports	190 (58.6%)
Objections	105 (32.4%)
Neutral	13 (4.0%)
Unclear	14 (4.3%)
No comments	2 (0.7%)
Total	324

A summary of the issues raised and the officers' comments and recommended actions can be found in Appendix 3. Whilst our procedures state that all the consultation responses should be appended to the committee report this is not practicable because of the large number of responses that have been received, so only a summary is included. The full responses may be viewed in the public file in the Reception of the Planning Office, 61 Wyndham Road, Salisbury, SP1 3AH.

The minutes of the Southern Area Committee (on 14 December 2006) and the City Area Committee (on 11 January 2007) and the Planning, Economic Development and Scrutiny Panel on 22 January 2007 are attached at Appendix 8 of this report.

The majority of the objections (68%) were raised in the form of a petition. One of the issues raised as part of the petition was: "if the airstrip is provided with conservation status, the airfield operator will be free to increase flying operations without limit". There is, however, no direct relationship between the designation of a conservation area and an increase in flying activity. In a conservation area, proposals can be made for change of use or for new development; however, any proposals would have to be considered in terms of their effect on the character or appearance of the conservation area. Therefore, conservation area designation would not necessarily mean that an existing use would have to remain or be intensified. It should be noted that any increase in flying activity would mean that other works would be necessary for which planning permission would probably be required, for example the installation of lights for night flying, extension of the airfield apron, or resurfacing of the runway.

One of the other issues raised as part of the petition was: "the airstrip and the buildings are secured by Grade 2 (sic) listings and covenants, such that the basic airfield function is protected, thus rendering the effect of a conservation area pointless". The effect of the existing listings (three Grade II* listed hangars, and Grade II listed former workshop, and Grade II listed TA Headquarters (former Station Headquarters)) is to protect the individual buildings of their special architectural or historic interest. Some protection is given to the setting of the listed buildings, a matter which is often left to judgement: Conservation area status, on the other hand, provides absolute clarity and certainty about the area protected. In addition, conservation area designation would provide protection to the unlisted buildings within the boundary from demolition, and would give protection to trees, currently not afforded by the individual listings.

A number of representations were made regarding the noise from the airfield, and there was a concern that by designating the airfield as a conservation area that the noise would continue to cause a nuisance and may even increase. As mentioned previously, conservation area designation does not preserve the area in aspic. Existing uses would not necessarily have to remain, as proposals can be made for alternative uses, and these would be considered acceptable where they would adhere to the Local Plan policies. The conservation area designation would add an additional consideration to any planning application. Furthermore, conservation area designation is being proposed because of the special character of the area, and the nuisance from aircraft noise is not directly relevant to the assessment of its special character.

The majority of supporters for the conservation area (62%) cited the historic significance of the airfield as being the key reason why the Airfield should be protected. This is clearly one of the main reasons why the assessment has identified the Airfield as being worthy of conservation area status.

Another key issue to supporters of the conservation area was the wish to see the Airfield protected from inappropriate development. The intention of any conservation area designation would be to ensure that changes are managed in a way that preserves or enhances the character or appearance of the area, and ensure that any new development is sensitive to the character and appearance of the area.

Further officer comments on the issues raised on the character assessment can be found in Appendix 3.

The Sustainability Appraisal

A strategic environmental assessment (SEA) is required under the European Directive 2001/42/EC “on the assessment of the effects of certain plans and programmes on the environment”. The SEA Directive is transposed into law by the SEA Regulations, the full name of which is “the Environmental Assessment of Plans and Programmes Regulations 2004”. Salisbury District Council’s Sustainability Appraisal framework, required under Regulation 39 (2) of the Planning and Compulsory Purchase Act 2004, incorporates the requirements of the SEA Directive. This is entirely consistent with “A Practical Guide to the Strategic Environmental Assessment Directive” (ODPM et al, 2005).

The regulations state that an appraisal must be carried out for plans and programmes which determine land use at the local level where they are likely to have “significant environmental effects”. As raised by one objector, there is some ambiguity over what represents “significant environmental effects” and whether an SEA was required for consideration of the designation of a conservation area. However, by employing a prudent approach of due caution in the public interest, and taking account that conservation area status does have some significant environmental implications, not least of which are additional planning controls, then it was considered that in accordance with the government guidance, the council’s sustainability appraisal framework should be used. It should be noted that on consultation of the appraisal, none of the four statutory agencies (Environment Agency, English Heritage, and the Countryside Agency/English Nature (now Natural England)) have raised any objections to this approach.

Officers’ Comments on the Consultation Responses to the Sustainability Appraisal

Three parties have made comments regarding the Sustainability Appraisal and these are highlighted in detail in the table in Appendix 4, with the officers’ responses and recommended action attached. In summary, it is not considered that the objections are valid.

One of the objections raised related to the weighted scoring system employed for the Sustainability Appraisal, specifically that it failed to provide an objective and justified appraisal of whether designating a conservation area would be a sustainable course of action. The methodology adopted was consistent with the guidance set out in “Sustainability Appraisal of Regional Spatial Strategies and Local Development Documents”, Office of the Deputy Prime Minister, November 2005. The procedures have been carefully followed and it is not accepted that the methodology used was flawed.

As to the evaluation made, this represented a valid assessment of the sustainability credentials of the proposal and has been carried out in a professional and objective way. A number of the objections raised are themselves of a highly subjective nature, which appear to have been made without rigorous justification.

It is for these reasons, and those detailed in the attached appendix, that it is concluded that the Sustainability Report is a robust document, which clearly demonstrates that designating a conservation area at the Old

Sarum Airfield, would be the most effective means of ensuring a sustainable future of the site, consistent with the adopted objectives of the council. Furthermore, the requirements of the SEA Directive have been satisfied.

Overall Conclusion

The independent assessment carried out by Atkins Heritage has been based on sound guidance and criteria. The case for a proposed conservation area has been demonstrated robustly.

The public consultation exercise resulted in approximately 58% of the responses being in support (32% objecting) of the proposed conservation area designation, the majority of which believe that a conservation area should be designated because of the historic significance of the Airfield.

The majority of the objections received were based on a petition response, raising issues about the potential increase in flying activity if a conservation area were designated. However, there is no direct relationship between conservation area designation and the increase in flying activity, as flying activity is completely independent of conservation area status.

In conclusion, officers consider that Old Sarum Airfield has been demonstrated to have "special architectural or historic interest the character or appearance of which is desirable to preserve or enhance" as required under the legislation. The boundary has been re-examined by the consultants in light of the consultation responses, and this has been amended where it is considered appropriate (see plan in Appendix 2).

Recommendations:

It is recommended that Members:

1. Make note of: a) the Atkins Heritage assessment for Old Sarum Airfield; b) the Sustainability Appraisal; and c) the outcome of the public consultation exercise, as summarised in the tables in Appendices 3 and 4; and
2. Designate a conservation area at Old Sarum Airfield, with the boundaries as shown in Appendix 2; and
3. Request that officers prepare a management plan for the designated conservation area.

Background Papers:

Appendix 1 - Originally proposed boundary of conservation area

Appendix 2 - Amended boundary of proposed conservation area following consultation responses

Appendix 3 - Table summary of responses on the character appraisal

Appendix 4 - Table summary of responses on the sustainability appraisal report

Appendix 5 - Atkins Heritage's response to the main objections raised during the public consultation

Appendix 6 - Minutes of the public meeting held on 26 September 2006

Appendix 7 - Implications of conservation area designation

Appendix 8 – Minutes of Southern Area and City Area Committees and the Planning & Economic Development Overview & Scrutiny Panel

Appendix 9 – Copy of the Procedure Note

Full copies of the responses can be viewed by Members at the Planning Office and 47 Endless Street, including the reports commissioned by Blanefield (produced by Feilden & Mawson) and Sarum Business Park (produced by Pegasus Planning Group), and can be viewed by members of the public at the Reception of the Planning Office at 61 Wyndham Road, Salisbury, SP1 3AH.

Implications:

- **Financial** : Cost of preparing a management plan for the conservation area if designated.
- **Legal** : In the report.
- **Human Rights** : None at this stage.
- **Personnel** : N/A
- **Community Safety** : N/A
- **Environmental** : Safeguarding the district's heritage assets.
- **Council's Core Values** : Working to create a better, more sustainable district.
- **Wards Affected** : Laverstock
- **ICT** : N/A