

Appendix 3

Table Summary of Consultation Responses on the Old Sarum Character Appraisal

Summary of Objections:

| ISSUE RAISED | NO. OF RESPONSES | OFFICER COMMENT |
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| <p>If the airstrip is provided with conservation status, the airfield operator will be free to increase flying operations without limit.</p> | <p>83</p> | <p>Conservation area designation would mean that any proposals for change of use or for new development would have to be considered against the relevant policies in local plan. One consideration would be that the proposals would need to preserve or enhance the character of the conservation area. Therefore, alternative uses or development of the land may be possible, and it would not necessarily mean that existing uses would continue.</p> <p>The operator would be free to increase flying operations even if the Airfield is not designated as a conservation area, although it should be noted that intensification of flying activity might lead to proposals that would require planning permission.</p> |
| <p>The airstrip and the buildings are secured by Grade 2 listings and covenants, such that the basic airfield function is protected, thus rendering the effect of a conservation area pointless.</p> | <p>71</p> | <p>The three former WW1 hangars are in fact Grade II* listed buildings. There are also two Grade II listed buildings (the former workshops and the TA Headquarters). The effect of these designations would be that any proposals for development would be considered against whether or not they would preserve or enhance the setting of the listed buildings.</p> <p>The setting of a listed building might only be restricted to the immediate area surrounding the building, or it might extend to a wider area (for example, in this case it might cover part or all of the airfield). Irrespective of this, the listing of buildings and the designation of conservation areas are based on two separate premises. The purpose of listing buildings is to identify the special architectural or historic interest of individual buildings. On the other hand, conservation area designation focuses on the character of an area, and its boundary provides absolute clarity and certainty over what is protected.</p> |

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| | | In addition, conservation area designation provides protection to the unlisted buildings from demolition, and would provide protection to trees, currently not afforded by the individual listings. |
| The area should not be preserved because keeping the airfield is a nuisance to local residents. | 17 | Conservation area status is being proposed because of the special character of the airfield that derives from its individual elements, its layout, its open spaces, landscaping and boundaries. The issue of nuisance is not a relevant consideration in the proposed designation of the conservation area. |
| There is not sufficient merit in the buildings to justify a conservation area. | 6 | The site's merit has been recognised through the granting of Grade II* & Grade II listing on several buildings. Additional buildings within the proposed conservation area provide historical context and contribute to the setting of these buildings, without which their value would be diminished. |
| Conservation area designation would result in the airfield use continuing meaning that the land would not be able to be developed to meet local housing need. | 3 | Conservation area status would not necessarily mean that the airfield use would have to continue, nor would it preclude other uses being granted planning permission. Any proposed change of use or development would need to adhere to the policies in the Local Plan in order to gain planning permission, including the requirement to preserve or enhance the character of the conservation area. |
| A conservation area could not be supported here because the boundary seems too arbitrary. | 3 | <p>The rationale for the boundary is explained on P37 of the Atkins' appraisal. It encompasses those features of the layout and architecture that share as a group and in relatively complete form, the aspects of architectural and historic interest defined in the appraisal.</p> <p>It should be noted that following representations, the boundary has been re-examined by Atkins Heritage, and it is proposed to be amended to exclude part of Sarum Business Park, on the south side of the Portway (see amended plan of proposed conservation area in Appendix 2).</p> |

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| <p>The disparate range of development over the last few years, e.g. the Beehive Park and Ride, means that there are no open views onto the airfield anymore, and therefore it is not special enough to merit conservation area status.</p> | <p>2</p> | <p>Views of the airfield do not have to be clear of obstructions or modern development to have merit. Views that can be appreciated include those from Old Sarum, and from the A338.</p> |
| <p>The conservation area may not allow the airfield to be retained (the airfield may be closed down because future increases in activity may cause damage to the character of the Conservation Area).</p> | <p>1</p> | <p>The council would not have any power to stop any existing uses merely because they would harm the character of the conservation area. If the area was reappraised in the future and it was felt that the character of the area had been eroded as a result of a particular use, then de-designation of the conservation area might have to be considered.</p> |
| <p>The World War 1 connections do not make it significant enough.</p> | <p>1</p> | <p>The airfield's WWI connections - its unusual, almost complete assemblage of WWI technical buildings – make it of significance in global terms, as well as its army school of cooperation function (from 1921 onwards) which contributed to our national defence programme at that time and makes the airfield of national significance.</p> |
| <p>The conservation area is only being proposed to protect certain individuals whose properties would be blighted by development of the airfield.</p> | <p>1</p> | <p>The process of area appraisal has shown that Old Sarum Airfield merits Conservation Area status irrespective of any political intent.</p> |
| <p>As a householder my permitted development rights will be restricted, which will mean that there will be more red tape and my proposals may be rejected because they would adversely affect the character of the conservation area.</p> | <p>1</p> | <p>Whilst it is recognised that there are added controls over what householders can do to their properties within a conservation area, there are also certain benefits. For example, maintaining the character of properties within a conservation area ensures that the attractiveness of the area is preserved, and this in turn may add value to the property.</p> |

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| One of the reasons for the proposed conservation area designation is flawed: the airfield has not been in continuous use for flying since WW1. | 1 | The airfield is virtually unaltered, and has been used continuously throughout the last century, even if flying has not been a daily event. The airfield still enables aircraft to take off and land, and this helps to demonstrate its historic use. |
| This airfield is not as significant as other airfields, e.g. Upavon, and does not deserve conservation area status. | 1 | Conservation area designation is not a relative process. Old Sarum meets the criteria for historical and architectural significance required for it to be designated. |
| Conservation area designation may cause business and trade within the area to stagnate. | 1 | Conservation area status would mean that any proposed change of use or development would need to be assessed against, in addition to other relevant policies, the conservation policies in the Local Plan, which seek the preservation or enhancement of the character of the conservation area. |
| The plan has been ill-conceived with obvious political interest involved and little practical application. | 1 | The appraisal and assessment of eligibility has been prepared according to professional standards. If designated as a conservation area, a management plan, based on the assessment of significance, would provide practical guidance. |
| Conservation area designation would mean that houses would be blighted for planning development purposes. | 1 | <p>Whilst it is true that conservation area status may be accompanied by added restrictions for householders, and possibly extra expense, there are a number of benefits of owning a property within a conservation area. These include:</p> <ul style="list-style-type: none"> • Retaining and enhancing special features maintains the character of the area, and as a result property values are likely to be higher; • Most properties are of a particular design or character which cannot be easily replicated in new developments; • Maintaining properties within a conservation area ensures the attractiveness of the area is preserved; • Owning a building within a conservation area can stimulate the appreciation and local history of the area. |

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| The case for conservation area designation has not been justified. | 1 | This appraisal and assessment of eligibility follows government and professional best practice, setting out defined criteria and describing and assessing features against these criteria. The conclusions of the appraisal carried out following the above methods is that designation is justified |
| Building 59 is in poor condition and has no historical significance. Can it be excluded from the Conservation Area? | 1 | Any building from WWI should be retained - all WWI buildings contribute to the group value of the site. Building 59 is especially important as it is associated with the aeroplane repair shed (ARS) (the single span hangar). IWM Duxford has an example of this building which is used as a café. However, Duxford does not have its ARS shed so that the combined survival of ARS and adjacent dope shop (blg59) here is even more important. |

Summary of Supports:

| ISSUE RAISED | NO. OF RESPONSES | OFFICER COMMENT |
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| The airfield is of historic significance and it should be preserved. | 117 | Conservation area status is being proposed because of the special character of the airfield that derives from, amongst other things, its historic significance. |
| A conservation area should be designated to prevent inappropriate development. | 47 | Whilst the intention of conservation area designation is not to inhibit further development, or to preserve the area completely unaltered, it would ensure that changes are managed in a way that would preserve or enhance the character or appearance of the area. |
| The airfield provides an important recreational centre for Salisbury that should be preserved for future generations. | 41 | No comment. |

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| A conservation area would help secure the future of the airfield and its buildings. | 34 | Conservation area status would not necessarily mean that the airfield use would have to continue, nor would it preclude other uses being granted planning permission. Any proposed change of use or development would need to adhere to the policies in the Local Plan in order to gain planning permission. |
| The airfield contributes to the setting of the unspoiled agricultural land and Old Sarum Castle, so should be preserved. | 28 | No comment. |
| The airfield should be preserved as a tourist attraction/asset to the local community. | 20 | This issue is not directly relevant to conservation area designation. |
| A conservation area would help to improve education/appreciation/understanding of the historic airfield. | 11 | This issue is not directly relevant to conservation area designation. |
| The preservation of the airfield is important to local business. | 10 | No comment. |
| A conservation area should be designated in order to protect wildlife. | 9 | Conservation area designation relates to the built environment, and the spaces between buildings and their settings. It does not give protection directly to wildlife. |
| A conservation area should be designated in order to prevent demolition of World War 1 and World War 2 buildings. | 8 | Conservation area designation would mean that consent would be required for the substantial or total demolition of buildings within the boundary of the conservation area with a cubic content greater than 115 cubic metres (see Appendix relating to <i>Implications of Conservation Area Designation</i> for further guidance). |

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| | | In assessing whether or not to grant consent for demolition, the local planning authority will have regard to the desirability of preserving or enhancing the character or appearance of the character or appearance of the conservation area. |
| The airfield should be preserved for the benefit of the disabled people who use it. | 5 | No comment. |
| A conservation area should be designated to protect local archaeology. | 2 | Conservation area designation relates to the built environment, and the spaces between buildings and their settings. It does not give protection in itself to buried archaeology, although by providing the local planning authority with greater control over new development this may be an indirect consequence. |
| A conservation area would lead to more controlled development, and thereby limit the impact on the local road network. | 2 | Conservation area designation would result in greater control over development in that, should planning permission be sought for new development, the local planning authority would have to consider how the proposals would affect the character of the conservation area. In addition, there would more restrictions over what householders could do to their properties without the need for planning permission. |
| A conservation area would enable part of Ford to remain undeveloped, thereby maintaining the character of the village. | 1 | The intention of conservation area designation is not to inhibit further development, or to preserve the area completely unaltered, but to ensure that changes are managed in a way that preserves or strengthens the character of the area. Any proposals for new development in Ford would be assessed against the policies in the Local Plan, including the requirement for the development to preserve or enhance the character of the conservation area. |

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| A conservation area should be designated in order to protect trees. | 1 | The character and appearance of a conservation area is defined, not just by the buildings, but also by the trees and landscape within it. Trees are given protection from pruning or felling within a conservation area (see the Appendix entitled <i>The Implications of Conservation Area Designation</i> for further information regarding the control over trees). |
| The airfield should be preserved because it offers easy transport links to other parts of the country. | 1 | Conservation area status is being proposed because of the special character of the airfield that derives from, amongst other things, its historic significance. However, easy transport links is not a reason for conservation area designation. |
| The airfield should be preserved as a commemoration to the airmen during the wars. | 1 | Conservation area status is being proposed because of the special character of the Airfield that derives from, amongst other things, its historic significance. Whilst commemoration alone would not be a sufficient justification for designating the conservation area, because the historic significance of the Airfield has been recognised the site could more easily become a commemoration. |

Summary of Other Comments Raised by Supporters (who raised matters of detail in their responses):

| ISSUE RAISED | NO. OF RESPONSES | OFFICER COMMENT |
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| Some of the houses on the Portway are not "rare examples of the World War 1 period" and therefore should not be in the proposed conservation area. | 1 | This is correct, however the properties contribute to the group value of this multi-period domestic part of the site, which tells the story of the continuing development of the airfield to meet school of army cooperation needs. |

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| <p>It would appear that the land at Manor Farm Road has been excluded from the proposed Conservation Area because it has been “promised for development”.</p> | <p>1</p> | <p>No public roads have been included, although these will have provided important links between the airfield, domestic accommodation and outlying supporting buildings. This is because the roads did not form part of the airfield design (already being in existence) and no longer demonstrate in their own right any character or aspect of their school of army cooperation era use.</p> |
| <p>There doesn't seem to be any justifiable reason for including the land between Green Lane and the Old Military Road adjoining the airfield in the conservation area.</p> | <p>1</p> | <p>This area formed part of the airfield, and contains the machine gun range, and the remnants of the early period squash courts.</p> |
| <p>It's not clear why the ex-MOD houses in Green Lane have been included in the proposed CA.</p> | <p>1</p> | <p>These were included due to their significance as part of the earliest layout of the site. Furthermore, the inclusion of these buildings helps recall the important role of officers in army cooperation squadrons (there were no sergeant pilots).</p> |
| <p>The conservation area should also include the strip of land to the south of the airfield that abuts Merrifield Road.</p> | <p>1</p> | <p>Demarcation of the conservation area was made at the existing fence line, drawn in the 1950s (after the army school of cooperation era). Any management plan would consider the gap between the fence and Merrifield Road to form part of the setting of the conservation area in any case.</p> |
| <p>The conservation area should also include Ford Farmhouse, the 1950s officers' married quarters, the airmen's accommodation and the NAAFI canteen on the north of the Portway.</p> | <p>1</p> | <p>Taken separately: Ford Farmhouse was indeed important, but as a building, its historic development has not mirrored that of the airfield. It did not form part of the airfield design (as it was already in existence), and no longer demonstrates any of the character of its Army School of Cooperation days. Although it provides good contextual information for understanding the airfield, it does not contribute to the fabric or setting. Some other form of designation may be appropriate.</p> <p>The 1950s officers' married quarters were built following the main era of Army School of Cooperation use. They themselves encroach on the airfield as originally designed.</p> |

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| | | No airmen's accommodation, nor the original NAAFI canteen, survives north of the Portway. |
| Why are the army houses on the Portway not included in the proposed conservation area? | 1 | The warrant officers' quarters are the only buildings to survive north of the Portway, and they are isolated from the rest of the conservation area among modern development. Their setting has been compromised to such an extent that they would form a very small island of conservation area, not considered to be worthwhile, given their secondary (expansion period) importance to the airfield. |
| Why is the group of houses in Ford included in the proposed conservation area? | 1 | These were included due to their significance as part of the earliest layout of the site. Furthermore, the inclusion of these buildings helps recall the important role of officers in army cooperation squadrons (there were no sergeant pilots). |
| Why are the sheds/containers of Interlock/Savant near the roundabout included in the proposed conservation area? | 1 | These structures are within the original boundary of the airfield and lie close to other prefabricated buildings that reflect historic airfield use. |
| Could the stone commemoration of the 18 th century markers on the road west of the pig farm be protected by the conservation area? | 1 | This area is isolated from the airfield, and the monument reflects different historical significances. Perhaps some other form of protection could be considered. |
| The boundary should be amended to include the whole of the WW1 airfield (including the modern buildings) in order to protect the layout and setting of the historic buildings and airfield. | 1 | The appraisal criteria for the proposed conservation area takes into account the survival of the historic character of the site. This is why some areas are excluded from the proposed boundary. |

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| <p>Is the fact that there are a number of listed buildings on the site not enough to provide protection to the airfield?</p> | <p>1</p> | <p>The three former WW1 hangars are in fact Grade II* listed buildings. There are also two Grade II listed buildings (the former workshops and the TA Headquarters). The effect of these designations would be that any proposals for development would be considered against whether or not they would preserve or enhance the setting of the listed buildings.</p> <p>The setting of a listed building might only be restricted to the immediate area surrounding the building, or it might extend to a wider area (for example, in this case it might cover part or all of the airfield). Irrespective of this, the listing of buildings and the designation of conservation areas are based on two separate premises. The purpose of listing buildings is to identify the special architectural or historic interest of individual buildings. On the other hand, conservation area designation focuses on the character of an area, and its boundary provides absolute clarity and certainty over what is protected.</p> <p>In addition, conservation area designation provides protection to the unlisted buildings from demolition, and would provide protection to trees, currently not afforded by the individual listings.</p> |
| <p>The Atkins report fails to explain any economic reason for justifying the conservation area as per the guidance in paragraph 3.3 of the English Heritage document "Conservation Area Appraisals 2005". What are the economic implications of designation on the owners and occupiers of sites within the proposed conservation area?</p> | <p>1</p> | <p>The appraisal carried out by Atkins Heritage is a heritage evaluation, the LPA is responsible for weighing up the economic arguments for and against conservation area status, prior to putting forward the area for consideration, which it has done so in the sustainability appraisal.</p> |

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| <p>The boundary for the proposed conservation area is inconsistent: it is not large enough to cover the original wartime buildings, yet it is much larger than necessary to protect the airstrip and adjacent buildings.</p> | <p>1</p> | <p>The appraisal criteria for the proposed conservation area takes into account the survival of the historical character of the airfield as a whole. Other buildings within the site provide historical context for the flying field and important buildings.</p> |
| <p>The conservation area should be restricted to the buildings and airstrip, to enable the rest of the land to be developed for housing.</p> | <p>1</p> | <p>The criterion for selection of site boundary has been defined clearly in the appraisal, and is based on surviving historic character, not on the importance of particular buildings. Also the 'airstrip' did not exist in Army School of Cooperation days – the whole flying field would have been in use for flying and other activities at one time or another.</p> |
| <p>The conservation area is supported provided it does not prevent the use of sustainable energy in the future.</p> | <p>1</p> | <p>Should planning permission be required for wind turbines or solar panels within the designated conservation area, the local planning authority would need to consider whether the proposals would preserve the special character of the area. Therefore, sustainable energy forms will be acceptable if they do not harm the character of the conservation area.</p> |
| <p>The conservation area is supported provided it does not restrict householders in developing their properties.</p> | <p>1</p> | <p>The intention of conservation area designation is not to inhibit further development, or to preserve the area completely unaltered, but to ensure that changes are managed in a way that preserves or strengthens the character of the area.</p> <p>Whilst it is recognised that there are added controls over what householders can do to their properties within a conservation area, there are also certain benefits in doing so. For example, maintaining the character of properties within a conservation area ensures that the attractiveness is preserved, and this in turn can add value to the property.</p> |

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| <p>Conservation area designation should foster business enterprise in order to sustain the area.</p> | <p>1</p> | <p>The intention of conservation area designation is not to inhibit further development, or to preserve the area completely unaltered, but to ensure that changes are managed in a way that preserves or strengthens the character of the area.</p> <p>Should planning permission be sought for the change of use or development of a local business, the only added consideration that would need to be given by the local planning authority would be how the proposals would affect the character of the conservation area.</p> |
| <p>There is no management plan for the airfield in the proposed conservation area, e.g. how will the maintenance of the buildings be funded?</p> | <p>1</p> | <p>If designated as a conservation area, the council would need to consider the future management of the area through the production of a management plan. The management plan might well need to address the issue of building maintenance if this is flagged up as an issue to the conservation area.</p> |
| <p>Only part of Green Lane seems to be in the conservation area, so how will this affect the future maintenance and access arrangements of the lane?</p> | <p>1</p> | <p>Conservation area designation would not affect the future management and access arrangements of Green Lane just because part of it falls within the boundary and part falls outside.</p> |
| <p>The council should consider repairs to the parts of Green Lane that fall within the proposed conservation area boundary. Could this road even be considered for adoption?</p> | <p>1</p> | <p>If designated as a conservation area, the council would need to consider the future management of the area, including ways in which the area could be enhanced. This is likely to involve discussions with landowners about how this could be achieved, and may or may not lead to discussions about adoption of roads by the County Council.</p> |
| <p>A firm planning policy should be established in order to prevent further development within the conservation area.</p> | <p>1</p> | <p>The intention of conservation area designation is not to inhibit further development, or to preserve the area completely unaltered, but to ensure that changes are managed in a way that preserves or strengthens the character of the area.</p> |

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| | | Under the forthcoming Local Development Framework it may be considered appropriate to formulate planning policies specific to the area. |
| The council should encourage and financially support the development and historic aspects of the site in order to attract aircraft and museums. | 1 | If designated as a conservation area, the council would need to consider the future management of the area, including the potential for interpretation, publicity and marketing. |
| Conservation area designation should be coupled with a limit on the nuisance caused by aircraft noise. | 1 | <p>The intention of conservation area designation is not to inhibit further development, or to preserve the area completely unaltered, but to ensure that changes are managed in a way that preserves or strengthens the character of the area.</p> <p>Conservation area status is being proposed because of the special character of the airfield that derives from its individual elements, its layout, its open spaces, landscaping and boundaries. The issue of nuisance is not a consideration in the designation of conservation areas.</p> |
| If the area is designated as a conservation area increased public access to the site should not compromise the security of the TA headquarters. | 1 | Conservation area designation would not necessarily result in an increase in public access. However, if this became an issue then this would need to be addressed in any future management plan for the area. |
| Proposals to restore buildings would have to be considered against the operational use of the buildings, and it is questioned how such works might be funded. | 1 | If designated as a conservation area, the council would need to consider the future management of the area, including the restoration of buildings within the area. This might well need to involve discussions with the owners and any other relevant bodies about ways in which this would be achieved and funded. |

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| <p>If designated as a conservation area, any management plan should try to incorporate wildlife-friendly management options, for example in relation to planting or managing hedgerows and managing the grassland.</p> | <p>1</p> | <p>If designated as a conservation area, the council would need to consider the future management of the area, including proposals to preserve or enhance the special landscape character of the area. However, the implementation of the management plan would be the responsibility of the landowners and the statutory bodies.</p> |
| <p>The working airfield does not make it suitable for access for education for children.</p> | <p>1</p> | <p>If designated as a conservation area, the council would need to consider the future management of the area through the production of a management plan. The management plan might well need to address the issue of access if this is flagged up as an issue to the conservation area.</p> |
| <p>The airstrip is protected by a covenant that prevents development, so what is the point in conservation area designation?</p> | <p>1</p> | <p>Conservation area status is being proposed because of the special character of the airfield (i.e. the airstrip plus the surrounding buildings/land) that derives from its individual elements, its layout, its open spaces, landscaping and boundaries.</p> <p>Covenants are private matters, which are not enforceable by the council.</p> |
| <p>A conservation area without enforceable agreements to regulate the use of the airfield would be disastrous environmentally, and could make the local authority liable to litigation under Human Rights laws.</p> | <p>1</p> | <p>Conservation area designation would mean that any proposals for change of use or for new development would have to be considered against the relevant policies in local plan. One consideration would be that the proposals would need to preserve or enhance the character of the conservation area. Therefore, alternative uses or development of the land may be possible, and it would not necessarily mean that existing uses would have to continue.</p> |

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| <p>A lot of the buildings on the site should be demolished because they are scars on the landscape and adversely affect the setting of Old Sarum Castle.</p> | <p>1</p> | <p>In appraising the heritage value of a place, all periods are given equal weighting, and areas of importance drawn up due to other more detailed criteria (such as architectural and historic significance, survival, rarity etc). 20th century buildings are potentially as important as iron age structures, depending on other aspects of their historic and cultural significance.</p> |
| <p>The current situation with reference to bus and road access has not been resolved - this is more important than conservation area designation.</p> | <p>1</p> | <p>Conservation area status is being proposed because of the special character of the airfield that derives from its individual elements, its layout, its open spaces, landscaping and boundaries. This assessment is not mutually exclusive of other assessments that might be required to resolve transportation issues, and the decision as to whether or not to consider those other issues is a political one.</p> |

Appendix 4

Table Summary of Responses on the Old Sarum Airfield Sustainability Appraisal Report

Summary of Issues Raised:

| ISSUE RAISED | NO. OF RESPONSES | OFFICER COMMENT |
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| There do not seem to be significant beneficial interests for the "not designating a conservation area" option (see Option 2, pages 15-17 of the SA Report). There may be economic benefits if there is no conservation area designated? | 1 | These benefits are unclear. If it is being intimated that non-designation could lead to development of the airfield for an employment park, then this is against current planning policy and would not currently be supported irrespective of whether a conservation area existed. |
| There is a sloppiness in presentation | 1 | The SA follows the guidance set out in 'Sustainability Appraisal of Regional Spatial Strategies and Local Development Documents, Office of the Deputy Prime Minister, November 2005'. |
| Inadequacy of options explored | 1 | This is a confusing objection. The options open to the Council regarding this discrete land use issue is to either designate or not. We fail to see what other options there are. |
| The Appraisal may not be required | 1 | There is some ambiguity over what represents significant environmental effects and whether such an appraisal is 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 decided that an appraisal was the correct course of action. On consultation regarding this matter, none of the four statutory agencies (Environment Agency, English Heritage, Countryside Agency or Natural England) have raised any objections to this approach. |

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| The SA document displays limited interpretation of both the SEA Directive and ODPM guidance | 1 | Disagree. The SA document encompasses all matters required by the SEA Regulations and more. |
| The scoring of the options is spurious | 1 | Disagree. It is based on an objective application of the councils adopted SA objectives and follows Government guidance |
| There is double counting | 1 | Where a sustainable outcome applies to more than a single objective then it has been properly recorded. |
| The SA ignores secondary effects such as noise | 1 | A conservation area would not prescribe or limit land use. It seeks to protect the intrinsic value of a group of buildings and their setting. |
| There is also strong protection for the most sensitive buildings on the airfield via listed building designation | 1 | There are buildings which have been identified as forming part of the historical group which currently have no protection from demolition. This is exemplified by the demolition of one of the pillboxes on the airfield in the summer of 2006. |
| There are other options available for conserving the airfield such as SPD, Article 4 Directions or 106 agreements | 1 | SDC is following government policy and established practices for assessing the conservation merits of an area. It is difficult to envisage all parties at the airfield entering into voluntary legal agreements with the council. |
| The SA appraisal represents the first use of the council's Sustainability Objectives following consultation | 1 | Incorrect. They were first used for the Hindon Lane Development Brief at Tisbury |
| There is a lack of balance in the assessment e.g. demolition is no more or less likely to occur irrespective of conservation area status | 1 | Incorrect. Conservation Area designation does protect non-listed buildings of a certain volume from demolition. There is no such protection without designation. This is exemplified by the demolition of one of the pillboxes on the airfield in the summer of 2006. |

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| Learning opportunities are not precluded in the absence of a CA | 1 | To afford both a learning and historical opportunity it is first necessary to conserve the area of interest. As has been mentioned a pillbox which was important within the group and of heritage interest to future generations has already been lost. It is possible that the erosion of quality will continue thereby diluting the future value and interest in the site. |
| Undue reliance on management plan yet to be prepared | 1 | Disagree. The council is currently embarking on producing new management plans for all its conservation areas. They follow best practice and put in place a positive framework for ensuring future evolution of the area involved. |
| The assessment is unacceptably partial, biased and subjective | 1 | Disagree. The SA follows the guidance set out in 'Sustainability Appraisal of Regional Spatial Strategies and Local Development Documents, Office of the Deputy Prime Minister, November 2005'. It is the result of a thorough and objective exercise which clearly demonstrates that designating a conservation area is a course of action in accordance with national, regional and local sustainability objectives. |
| CA designation provides only marginal benefits | 1 | Agree that there are benefits. |
| SDC Sustainability Objective 1: to develop vibrant, sustainable communities. Comment: it will have no net effect | 1 | Disagree. Vibrant sustainable communities are rich in heritage and can encourage the imaginative re-use of historic buildings to safeguard their value and overcome the need for new build. |
| SDC Sustainability Objective 2: Providing Affordable Homes Comment: CA status could limit options for delivery. | 1 | Disagree. The LDF exercise for housing allocation has yet to be undertaken and will be carried out systematically when the time arrives. This should not deflect the council from its obligation to assess whether there are areas of sufficient heritage value to merit conservation area status. Conservation area designation does not preclude new development, but it does mean that new development must be demonstrated to have a neutral or enhancing impact on the area, hence making it more difficult to justify. |

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| <p>SDC Sustainability Objective 3: Reduction of rural poverty</p> <p>Comment: CA designation could limit options for delivery</p> | 1 | Disagree. There is no explanation as to why the council approach to tackling rural poverty is mutually exclusive. It assumes that housing on the airfield is either precluded by CA designation or important to tackling rural poverty. Neither case has been proven. |
| <p>SDC Sustainability Objective 8: Ensure a fully inclusive environment.</p> <p>Comment: without details of the management plan this cannot be judged. Flying is independent of CA designation</p> | 1 | <p>Disagree in that a management plan affords a good opportunity to try and provide access for all.</p> <p>Agree that the flying is independent of CA status</p> |
| <p>SDC Sustainability Objective 11: to increase energy efficiency</p> <p>Comment: not relevant to energy conservation</p> | 1 | Disagree. The re-use of existing buildings can be demonstrably more efficient than new build. |
| <p>SDC Sustainability Objective 12 conserve the landscape</p> <p>Comment: only potential benefit over time</p> | 1 | Agree that the benefits will not be realised instantly and will depend on the management plan and partnership working. However it is envisaged that this could provide a significant long-term benefit. |
| <p>SDC Sustainability Objective 15 Reduction of pollution and waste</p> <p>Comment: not relevant</p> | 1 | Disagree. Reuse of existing buildings is clearly relevant here. |

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| <p>SDC Sustainability Objective 21 To promote sustainable tourism and cultural activities.</p> <p>Comment: not clear why benefits should be ascribed to CA status</p> | 1 | The management plan will all promotion and interpretation of the historic significance of the site. |
| <p>SDC Sustainability Objective 23 To protect, maintain and improve cultural heritage</p> <p>Comment: no justification for ascribing this solely to CA status</p> | 1 | Disagree. CA designation would immediately conserve a number of the important group buildings which currently have no protection from demolition. |
| <p>SDC Sustainability Objective 2: Providing Affordable Homes</p> <p>Comment: CA designation will limit options for future district housing needs</p> | 1 | Disagree. CA status does not preclude development. The LPA cannot ignore the heritage merits of the sites, as it might be expedient to do so to safeguard potential development land. That would be clearly prejudicial. |
| <p>SDC Sustainability Objective 3: Reduction of rural poverty</p> <p>Comment: as above</p> | 1 | As above |
| <p>SDC Sustainability Objective 8: Ensure a fully inclusive environment.</p> <p>Comment: CA status will not improve access and flying is independent of CA designation</p> | 1 | Disagree. The management plan affords an opportunity to work towards improved access and to publicise the heritage of the site as an attraction. |

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| <p>Comment: CA provides no additional control over demolition/reuse new build than already exists</p> | <p>1</p> | <p>Disagree. This is not correct. CA status would afford protection from demolition to a number of the historic group of buildings which currently have no such protection</p> |
| <p>SDC Sustainability Objective 11: to increase energy efficiency</p> <p>Comment: not relevant to energy consumption</p> | <p>1</p> | <p>Disagree. The trend for demolition and new build instead of re-using new buildings is not energy efficient</p> |
| <p>SDC Sustainability Objective 12 conserve the landscape</p> <p>Comment: CA provides no additional control over demolition</p> | <p>1</p> | <p>Disagree. This is not correct. CA status would afford protection from demolition to a number of the historic group of buildings which currently have no such protection</p> |
| <p>SDC Sustainability Objective 15 Reduction of pollution and waste</p> <p>Comment: CA will not reduce pollution and waste and is double counted</p> | <p>1</p> | <p>Disagree. The trend for demolition and new build instead of re-using new buildings is not energy efficient</p> |
| <p>SDC Sustainability Objective 18 To raise educational attainment levels</p> <p>Comment: SDC assumes that interpretation will not happen without CA status</p> | <p>1</p> | <p>Disagree. There is a greater opportunity to raise awareness and provide education with CA status and management plan. There is no evidence this is being delivered currently.</p> |

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| <p>SDC Sustainability Objective 19 To facilitate sustainable economic growth</p> <p>Comment: SDC's comments relate to past decisions</p> | 1 | <p>Disagree. Trend projection and understanding trends is important in forecasting future patterns of development. There is no sign of the existing market changing to protect the heritage assets on the site.</p> |
| <p>SDC Sustainability Objective 21 To promote sustainable tourism and cultural activities.</p> <p>Comment: the council does not allow for other financial resources to be available</p> | 1 | <p>Unclear. Is it suggested that the council should invest in interpretation of the historic value of the site but not consider designation as a conservation area? Is it suggested the market itself will deliver this funding voluntarily?</p> |
| <p>SDC Sustainability Objective 22, To maintain and enhance the viability and vitality of existing services</p> <p>Comment: not relevant`</p> | 1 | <p>Disagree. It is considered that there could be significant economic spin-offs from a new conservation area.</p> |
| <p>SDC Sustainability Objective 23 To protect, maintain and improve cultural heritage</p> <p>Comments: relate to past decisions. No evidence that additional controls are not adequate</p> | 1 | <p>Disagree. Trend projection and understanding trends is important in forecasting future patterns of development. There is no sign of the existing market changing to protect the heritage assets on the site.</p> <p>Disagree. This is not correct. CA status would afford protection from demolition to a number of the historic group of buildings which currently have no such protection.</p> |

Old Sarum Airfield: response to main objections raised during public consultation

The following sets out the Atkins Heritage response to the comments of the three main respondents to the Old Sarum Airfield Character Appraisal and Assessment of Eligibility for Conservation Area designation. These respondents prepared objections in the form of full reports or extended letters, and are:

- Feilden and Mawson, on behalf of Blanefield
- Pegasus Planning Group on behalf of Service Developments Limited (Sarum business Park); and
- Mr. Beal of OSAF Projects Ltd

The responses below intend to answer the main objections of the three respondents, although not necessarily in the order of their comments, both to avoid repetition, and in order to make clear the key points with which these parties take issue.

Feilden and Mawson Critique on the Conservation Area Assessment, on behalf of Blanefield, 19th October 2006.

Feilden and Mawson take no issue with the methodology for assessment (save in terms of designation criteria, answered below first point), and do not dispute the WWI significance of the airfield, citing much of English Heritage's Thematic Study of Military Aviation Sites and Structures, Lake 2001. In terms of their general introductory remarks, we acknowledge that the terminology in the report may be inconsistent, and although all efforts were made to standardise terms, some inconsistencies may remain. For the sake of clarity, the 'airfield' includes the whole site, buildings and associated areas. The 'flying field' is the open grassed area.

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| <p>Section 8 and 10.1 Lack of district wide criteria for designation</p> | <p>The District Council have not, until recently, had the opportunity to revise their local plan to include such criteria, so in the meantime specific criteria have been devised by Atkins Heritage for the designation of conservation areas in the district, to avoid the loss of important historic areas in the period between development plan revisions.</p> |
| <p>Section 9 (and 10.1.2) The airfield no longer looks or feels like a military base, and very little of the WWI airbase survives in its original form.</p> <p>On entry to the site, the character is not evident.</p> | <p>The character appraisal demonstrates that the majority of WWI technical buildings do survive (as supported by the English Heritage Thematic Study, Lake 2001) and that the 'character' is provided by more than just the technical buildings – the open feel, planting and associated domestic military architecture of WW1 and other periods. The site entrance has lost its character, but this could be remedied somewhat through the reinstatement of formal signage, or formal planting, to reflect the formality of the original entrance.</p> |
| <p>Section 9.7, 9.8, 9.9 The site at Yatesbury demonstrates better survival. The airfield is not unique.</p> | <p>Conservation Area designation is not a relative exercise – other airfields with similar or better examples of certain features are also important. Old Sarum airfield is important for the reasons set out in the Conservation Area Appraisal. 'Uniqueness' is not a criterion for designation of Conservation Areas (or any historic or archaeological site).</p> |

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| <p>Section 10 The appraisal concentrates on the built structures</p> | <p>Atkins does assess 'group and area quality' as well as the individual buildings – this is in fact one of our criteria for designation and one which is well met by the airfield.</p> |
| <p>Section 10 There are no policies or proposals for future management</p> | <p>Policies for future management would be formulated within a 'Conservation Area Management Plan', should the airfield be designated.</p> |
| <p>Section 10 There is no 'vulnerability analysis'</p> | <p>The effects of or vulnerability/sensitivity of the site to modern development is clearly described in the appraisal p32. Those areas where modern development has removed or diminished the airfield character have consequently been left out of the Conservation Area, as described on page 37 of the appraisal.</p> |
| <p>Section 10.1.2 The study area should be set prior to assessment</p> | <p>The study area chosen for assessment included the maximum extent of the airfield, although some areas were not accessed physically (e.g. the area of the firing range), clear views were gained into them. This is made clear on p7 of the appraisal. In fact, a larger area was surveyed in search of boundary markers, to ensure all surviving markers were identified.</p> |
| <p>Section 10.1.5 photographs Demonstrate that there is intrusion to views of the airfield</p> | <p>Alternative views can be had, however, which do offer an idea of the airfield's historic character, for instance from just north of Ford where views can clearly be gained to the hangars (see p23 of the report). This, and other views, are also described in the report (p23, 25 and 26). In any case, intrusion or interruption of views need not detract from significance.</p> |
| <p>Section 10.1.3 The Countryside Agency's Landscape Character description gives no impression of the airfield area</p> | <p>In relation to the issue of landscape, we agree that the Countryside Agency description is too broad to do the area justice. A more detailed description of the surrounding landscape is not, however, necessary for the Conservation Area appraisal. The setting of the ancient site of Old Sarum, while important for that site, is also irrelevant to the rationale to designate Old Sarum airfield. Any future management plan for the site may identify an area which could overlap with the Conservation Area of Old Sarum, much like a buffer zone, to ensure the consideration of its immediate setting. If so, associated policies would need to be adopted that were agreed with all stakeholders.</p> |
| <p>Section 10.1.6 The airfield is not flat, so was not all usable for flying</p> | <p>We agree that the airfield was probably landscaped for drainage purposes during its development as an airfield and is in fact convex (but not to such an extent that one side of it cannot be seen from</p> |

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| | <p>the other). This has been backed up by two visits to the airfield where the hangars were seen clearly when looking north from Manor Farm Road (see picture on p23 of the report). Also, the use of the 'airstrip' or in any case a main area for taking off and landing, was only one of the functions of the flying field, which would also have been used for the servicing, taxiing, and parking of aircraft. For example, during the D-Day operation the site was extensively occupied. We believe the flying circles reproduced on p11 were in fact used for bombing simulations (Jeremy Lake pers comm.)</p> |
| <p>Section 10.1.7 & 8 Regarding present and future land use - no information is given in the appraisal</p> | <p>The extent of the present 'airstrip' is not relevant to the assessment of historical significance of the site (when there was no designated 'strip') and to our knowledge the only current agricultural use is by the adjacent pig farm. Present and future land use of the area is not relevant to the rationale for designation. Future use will be guided by any future management plan and possibly the granting of planning permission.</p> |
| <p>Section 10.1.9 Currently, additional boundaries divide up the site internally. The boundaries as indicated by air ministry markers is not considered, nor boundaries that could have included requisitioned land such as at Ford Farm</p> | <p>Regarding the internal boundaries of the site, we accept that the site has been divided with fences. However this does not affect its historic integrity (boundaries can always be removed). In relation to boundary analysis, our understanding of the originally designed airfield (1917) has come from Air Ministry Plans. This boundary does not include additional land requisitioned/used temporarily (i.e. not part of the enduring airfield design) Regarding the boundary stones of 1924, we would be pleased to establish the survival of further markers – only those accounted for in the appraisal were spotted during our survey, but all were searched for, again using Air Ministry Plans.</p> |
| <p>Section 10.1.12 Listed Buildings and their curtilage are already protected</p> | <p>We agree that Listing protects these buildings and their immediate surrounds. However, without the enveloping protection of a CA, these buildings could lose both context and setting.</p> |
| <p>Section 10.1.13 The archaeological potential of the site is not described in detail</p> | <p>While the buried archaeology of the site may be important, its significance (in particular in relation to periods outside those of the airfield's development and use) has no influence on the historic character of the site. Any future planning or development in the proposed conservation area would fall under the remit of PPG16 in which the archaeological context would have to be assessed.</p> |

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| <p>Section 10.1.14 Aerial photographic analysis was pioneered at Old Sarum</p> | <p>Original drawings and Air Ministry plans were used by Atkins Heritage in appraisal of the conservation area. Aerial photographs are useful additional detail for the site, however they are not essential in assessing its historical development or current character. Making something of the contribution of the site to the history of aerial photography could be explored in any future management plan.</p> |
| <p>Section 10.1.15 The Report does not identify which buildings contribute to character</p> | <p>The Atkins Heritage appraisal presents the site in various ways, firstly in Figure 7 (p51) the extent of the surviving airfield is illustrated and secondly in Appendix A (gazetteer of historic buildings and features, p55) surviving structures of the airfield are illustrated and described. The surviving buildings listed in each section of the 'physical development' chapter can be considered to be those that contribute to historic character.</p> |
| <p>Section 10.1.16 The gazetteer is referenced using OS coordinates, but no plan is given or cross referencing</p> | <p>In reference to the gazetteer, OS coordinates identify precise locations for the record. The precise locations need not be shown for the purpose of the appraisal. Figure 7 shows the locations of the main buildings.</p> |
| <p>Section 10.1.17.2 & 10.1.18 Although detractors are identified, their impact is not considered in the report's conclusions</p> | <p>The focus of our appraisal is the surviving historic character of the site (always the focus of a conservation area appraisal) and not the modern structures of the airfield. However we do describe in some detail the modern areas, intrusions and damage to the special qualities of the airfield on page 32. We agree that less space is given over in the report to the detractors to the significance of the site, but we persist in the judgement that despite these intrusions the historic character of the site is strong. In summary, there are detractors but not so much as to negate the overall importance of the site, and this feeds into our conclusions on page 37.</p> |
| <p>Section 10.1.19 The CA boundary is unjustified</p> | <p>We refer you to the comments regarding the boundary above but reiterate that the presence of listed buildings on the site does not ensure survival of the airfield. In addition, historical area assessment of the type we have carried out does not attempt to fix a site at a certain timeframe in its history. It acknowledges change over time, landscape re-use and the creation of new landscapes. Within the remit of any future management plan, the possibility of a buffer zone, i.e. an area outside the conservation area that could be agreed with stakeholders to ensure the protection of the airfield's setting,</p> |

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| | may also be considered. |
| Summary The report contains no cost benefit analysis. | Conservation Area Appraisal does not require cost benefit analysis. |

Pegasus Planning Group on behalf of Service Developments Limited (Sarum Business Park), Objections, 18th October 2006

We are pleased that the respondent is broadly supportive of the Conservation Area status for Old Sarum Airfield, but have taken into consideration their objection to the boundary in the northern part of the airfield, within the area of their client's premises.

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| Section 1.7 There will be constraints to further development if the CA is designated. | Should the Conservation Area be designated, any restrictions that are placed on particular buildings or areas will be targeted at those buildings that represent the significance of the airfield best. Areas that are secondary to the importance of the airfield will be controlled less stringently, and development proposals here could be tested to show whether they would detract from, or indeed enhance the setting of the Conservation Area. |
| Section 2.12 The inclusion of the two older Technical Area buildings has caused part of the respondent's site to be included in the CA. The boundary might otherwise have been along the road to the hangars as far as the Metal Workshop and Power House, where there is a firm boundary. | Indeed, the older buildings fronting the tree lined avenue do help conserve the character of the approach to the hangars, and are isolated survivors from this part of the site – making them all the more significant. (See below for reconsideration of boundary, however). |
| Section 2.13 Changes have been made internally and externally to the Technical Stores building and Salvage Shed within the objection site. The inward looking nature of the Business Park means that the 'character' of the CA is not experienced here. | While acknowledging significant change has been made to the Technical Stores and Salvage Shed, many of the changes are reversible and do not affect the exterior character of the buildings to such an extent that they are unrecognisable. The buildings still provide a sense of scale and function, to those passing along the tree lined avenue, and are in fact the only memories of the important original approach to the hangars. Within the Business Park, it is acknowledged that the character of the rest of the technical area is not able to be experienced (is 'unrecognisable' according to our methodology for selection for inclusion in the CA p37 of the appraisal), due to the contained nature of the Park, and lack of views through to the rest of the site. We therefore propose that the boundary be moved to include the Technical Stores building and Salvage Shed, but not the row of buildings along the Portway within the Business Park. The boundary would therefore run to the south of the buildings along the Portway within the Business Park |

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| | up to the Power House and Metal Workshop boundary (buildings 33 and 34 on our figure 7), and would then turn back towards the Portway, and continue as currently proposed (see amended plan of boundary). |
| <p>Section 3.4 The appraisal uses an out of date OS Map.</p> <p>The 'fabric and layout of its historic development' does not survive within the objection site. There are no surviving links, no military feel from within the business park, and modern building is more prevalent.</p> | <p>We acknowledge that the OS base plan is slightly out of date (2005). However, our site survey did identify that only two buildings survive in the area of the Sarum Business Park.</p> <p>We acknowledge that the boundary was not tightly drawn enough in this area, and it is recommended to be re-drawn as described above.</p> |
| <p>Section 3.10</p> <p>The objection site does not reflect important topographic character of the site, and nor do the buildings.</p> | <p>We agree to some extent, but the contribution of the two older buildings to the group value of the site - 'inclusion within an outstanding group of buildings and related features', qualify them for inclusion within the boundary.</p> |
| <p>Section 3.16 No mention is made of the Business Park in the assessment.</p> | <p>We have not singled out particular areas or buildings for attention within the modern development on the airfield. We only wish to make the case that areas of significant modern development be excluded from the CA. Our original boundary, taking into consideration the survival of the Salvage Shed and Technical Stores, drew a generous boundary through the site that also included some new buildings. It is proposed to be re-tightened and still meet our criteria for designation (see above).</p> |
| <p>Section 3.17-34 and 3.35-3.37 The character of the objection site and architectural interest are compromised. They do not meet the criteria for designation.</p> | <p>On reconsideration, we think that the boundary could be redrawn to better fit the criteria for and analysis of significant character that we describe (see above).</p> |
| <p>Section 44 There is no detailed recording of changes to the buildings on the objection site</p> | <p>CA Appraisal is not the place for detailed recording, which should be the subject of policies in any future management plan (should the area be designated). Our expert recognised the form and function of these buildings from what remains, and they are included in our gazetteer.</p> |

Mr Beal of OSAF Projects Ltd, letter regarding the Old Sarum Conservation Area Appraisal, 19 October 2006

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| <p>The boundary The boundary is not suitable</p> | <p>Atkins have reappraised the boundary, and find that, based on the principle of inclusion of all of the surviving areas of the designed WWI airfield, it should remain predominantly as proposed. However, the buildings along the Portway, within the Sarum Business Park, are now being recommended for exclusion on the basis that here 'significant modernisation' has occurred, to the extent that the historic character is no longer recognisable' (p37 of the appraisal, basis for inclusion/exclusion)</p> |
| <p>Mr. Beal's land There has been a lack of investigation in some areas of the site.</p> | <p>Mr. Beal's land was viewed clearly from Green Lane, and changes within it are considered to be of a temporary nature, not affecting the long term significance of the airfield.</p> |
| <p>Paul Francis Paul Francis is not an independent party, and is linked to English Heritage.</p> | <p>Paul Francis works neither for English Heritage nor for Atkins. He is an independent consultant, and the acknowledged expert in this field in the country.</p> |
| <p>Current use of the airfield, and future plans The main site is private, and used by the flying club, so promises of public benefit can never be carried through.</p> | <p>How the Flying Club continue to use the airfield, and how the public might in future be able to appreciate it, are considerations for a Management Plan, should the area be designated.</p> |
| <p>The surviving historic character It is too late to designate, as all the key buildings have now been demolished.</p> | <p>All the WWI technical buildings survive, and a good range of domestic buildings from other periods of the site's development. The strong historic character of the area, however, does not rely on total survival, but on other elements such as the relationship between buildings and areas, the importance of open spaces and the relationship between buildings and those open spaces.</p> |