# **Forward Planning and Transportation**

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# Report

**Subject**: Old Sarum Airfield Conservation Area Appraisal and Sustainability Appraisal

Report to : City Area Committee

Date: 11 January 2007

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## **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) are 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.

#### **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, Blanefield 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.

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).

#### The Approved Procedure

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:

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

A summary of the issues raised and the officers' comments and recommended actions can be found in Appendix 3.

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).

#### Recommendation

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. Make comments to Cabinet regarding: a) the designation of a conservation area at Old Sarum Airfield, with the boundaries shown on Appendix 2; and b) the need for officers to prepare a management plan should a conservation area be designated.

## **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 - Notes of the public meeting held on 26 September 2006

Appendix 7 - Implications of conservation area designation

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).

# 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

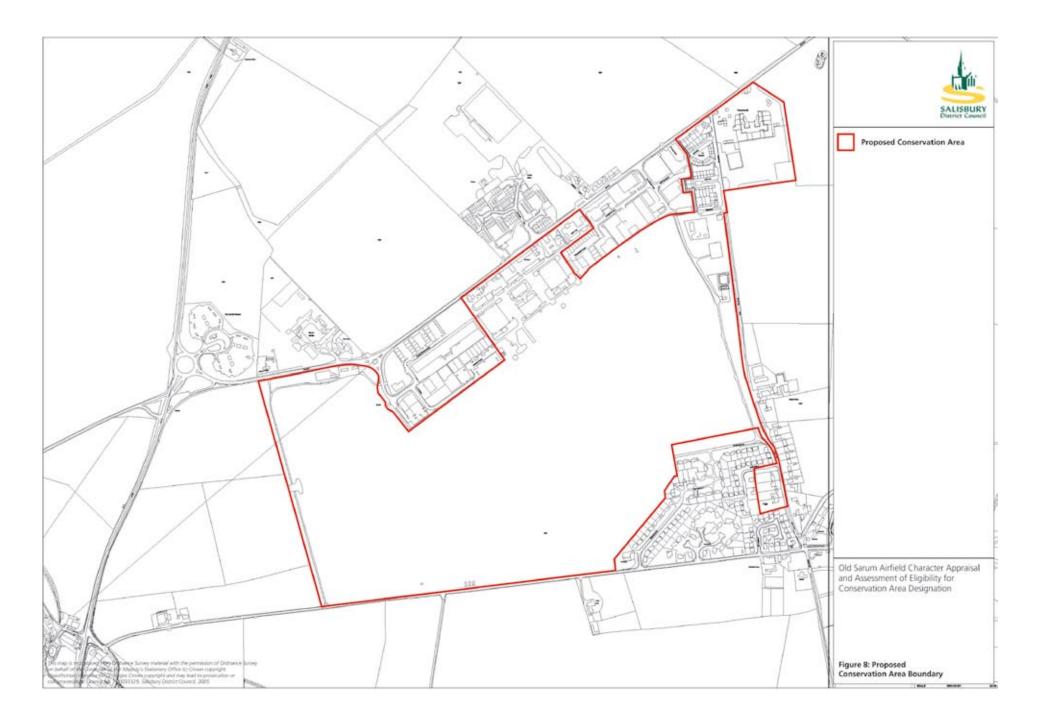
• Community Safety : N/A

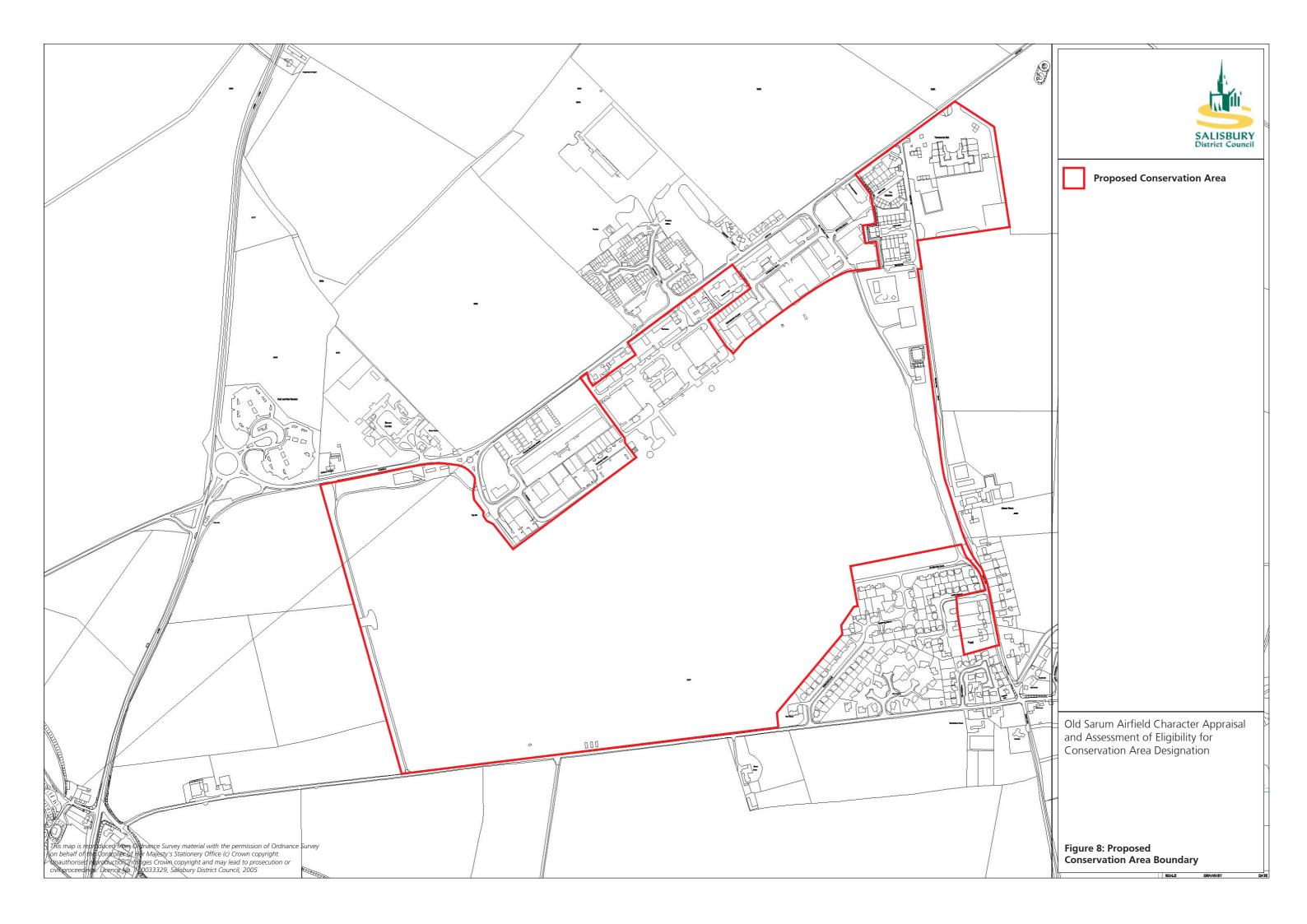
• **Environmental** : Safeguarding the district's heritage assets.

Council's Core Values: Working to create a better, more sustainable district.

Wards Affected : Laverstock.

• **ICT** : N/A





# Table Summary of Consultation Responses on the Old Sarum Character Appraisal

# **Summary of Objections:**

ISSUE RAISED	NO. OF RESPONSES	OFFICER COMMENT
If the airstrip is provided with conservation status, the airfield operator will be free to increase flying operations without limit.	83	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.  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.
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.	71	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.  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.

		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	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.  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).
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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.	2	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.
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).	1	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.
The World War 1 connections do not make it significant enough.	1	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.
The conservation area is only being proposed to protect certain individuals whose properties would be blighted by development of the airfield.	1	The process of area appraisal has shown that Old Sarum Airfield merits Conservation Area status irrespective of any political intent.
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.	1	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.

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 <b>plan</b> 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	<ul> <li>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:</li> <li>Retaining and enhancing special features maintains the character of the area, and as a result property values are likely to be higher;</li> <li>Most properties are of a particular design or character which cannot be easily replicated in new developments;</li> <li>Maintaining properties within a conservation area ensures the attractiveness of the area is preserved;</li> <li>Owning a building within a conservation area can stimulate the appreciation and local history of the area.</li> </ul>

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
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.

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 Implications of Conservation Area Designation for further guidance).

		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 are 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.

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
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.

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".	1	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.
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.	1	This area formed part of the airfield, and contains the machine gun range, and the remnants of the early period squash courts.
It's not clear why the ex-MOD houses in Green Lane have been included in the proposed CA.	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).
The conservation area should also include the strip of land to the south of the airfield that abuts Merrifield Road.	1	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.
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.	1	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.
		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.

		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 <sup>th</sup> century markers on the road west of the pig farm be protected by the conservation area?	1	This area is isolated form 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.

Is the fact that there are a number of listed buildings on the site not enough to provide protection to the airfield?	1	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.  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.  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 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?	1	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.

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.	1	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.
The conservation area should be restricted to the buildings and airstrip, to enable the rest of the land to be developed for housing.	1	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.
The conservation area is supported provided it does not prevent the use of sustainable energy in the future.	1	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.
The conservation area is supported provided it does not restrict householders in developing their properties.	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.  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.

Conservation area designation should foster business enterprise in order to sustain the area.	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.  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.
There is no management plan for the airfield in the proposed conservation area, e.g. how will the maintenance of the buildings be funded?	1	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.
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?	1	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.
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?	1	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.
A firm planning policy should be established in order to prevent further development within the conservation area.	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.

		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	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.  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.
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.

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.	1	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.
The working airfield does not make it suitable for access for education for children.	1	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.
The airstrip is protected by a covenant that prevents development, so what is the point in conservation area designation?	1	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.  Covenants are private matters, which are not enforceable by the council.
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.	1	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.

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.	1	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). 20 <sup>th</sup> century buildings are potentially as important as iron age structures, depending on other aspects of their historic and cultural significance.
The current situation with reference to bus and road access has not been resolved - this is more important than conservation area designation.	1	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.

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

# **Summary of Issues Raised:**

ISSUE RAISED	NO. OF RESPONSES	OFFICER COMMENT
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.

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.

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 communites.  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.

SDC Sustainability Objective 3: Reduction of rural poverty  Comment: CA designation could limit options for delivery	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.
SDC Sustainability Objective 8: Ensure a fully inclusive environment.  Comment: without details of the management plan this cannot be judged. Flying is independent of CA designation	1	Disagree in that a management plan affords a good opportunity to try and provide access for all.  Agree that the flying is independent of CA status
SDC Sustainability Objective 11: to increase energy efficiency  Comment: not relevant to energy conservation	1	Disagree. The re-use of existing buildings can be demonstrably more efficient than new build.
SDC Sustainability Objective 12 conserve the landscape  Comment: only potential benefit over time	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.
SDC Sustainability Objective 15 Reduction of pollution and waste  Comment: not relevant	1	Disagree. Reuse of existing buildings is clearly relevant here.

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

Comment: CA provides no additional control over demolition/reuse new build than already exists	1	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
SDC Sustainability Objective 11: to increase energy efficiency  Comment: not relevant to energy consumption	1	Disagree. The trend for demolition and new build instead of re-using new buildings is not energy efficient
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SDC Sustainability Objective 12 conserve the landscape	1	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
Comment: CA provides no additional control over demolition		
SDC Sustainability Objective 15 Reduction of pollution and waste	1	Disagree. The trend for demolition and new build instead of re-using new buildings is not energy efficient
Comment: CA will not reduce pollution and waste and is double counted		
SDC Sustainability Objective 18 To raise educational attainment levels	1	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.
Comment: SDC assumes that interpretation will not happen without CA status		

SDC Sustainability Objective 19 To facilitate sustainable economic growth  Comment: SDC's comments relate to past decisions	1	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.
SDC Sustainability Objective 21 To promote sustainable tourism and cultural activities.  Comment: the council does not allow for other financial resources to be available	1	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?
SDC Sustainability Objective 22, To maintain and enhance the viability and vitality of existing services  Comment: not relevant`	1	Disagree. It is considered that there could be significant economic spin-offs from a new conservation area.
SDC Sustainability Objective 23 To protect, maintain and improve cultural heritage  Comments: relate to past decisions. No evidence that additional controls are not adequate	1	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.  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.

Atkins November 2006 Appendix 5

## 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, 19<sup>th</sup> 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.

Section 8 and 10.1 Lack of district wide criteria for designation	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.
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.  On entry to the site, the character is not evident.	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.
Section 9.7, 9.8, 9.9 The site at Yatesbury demonstrates better survival. The airfield is not unique.	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).

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Section 10 The appraisal concentrates on the built structures	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.
Section 10 There are no policies or proposals for future management	Policies for future management would be formulated within a 'Conservation Area Management Plan', should the airfield be designated.
Section 10 There is no 'vulnerability analysis'	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.
Section 10.1.2 The study area should be set prior to assessment	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.
Section 10.1.5 photographs  Demonstrate that there is intrusion to views of the airfield	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.
Section 10.1.3  The Countryside Agency's Landscape Character description gives no impression of the airfield area	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.
Section 10.1.6  The airfield is not flat, so was not all usable for flying	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

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	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.)
Section 10.1.7 & 8 Regarding present and future land use - no information is given in the appraisal	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.
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	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.
Section 10.1.12 Listed Buildings and their curtilage are already protected	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.
Section 10.1.13  The archaeological potential of the site is not described in detail	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.

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Section 10.1.14 Aerial photographic analysis was pioneered at Old Sarum	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.
Section 10.1.15  The Report does not identify which buildings contribute to character	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.
Section 10.1.16  The gazetteer is referenced using OS coordinates, but no plan is given or cross referencing	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.
Section 10.1.17.2 & 10.1.18 Although detractors are identified, their impact is not considered in the report's conclusions	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.
Section 10.1.19 The CA boundary is unjustified	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,

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

# Pegasus Planning Group on behalf of Service Developments Limited (Sarum Business Park), Objections, 18<sup>th</sup> 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.

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 2.12	While acknowledging significant change has

#### 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

	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).
Section 3.4 The appraisal uses an out of date OS Map.	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.
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.	We acknowledge that the boundary was not tightly drawn enough in this area, and it is recommended to be re-drawn as described above.
Section 3.10  The objection site does not reflect important topographic character of the site, and nor do the buildings.	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.
Section 3.16  No mention is made of the Business  Park in the assessment.	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).
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.	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).
Section 44 There is no detailed recording of changes to the buildings on the objection site	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.

# $\operatorname{Mr}$ Beal of OSAF Projects Ltd, letter regarding the Old Sarum Conservation Area Appraisal, 19 October 2006

The boundary	Atkins have reappraised the boundary,
The boundary is not suitable	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)
Mr. Beal's land There has been a lack of investigation in some areas of the site.	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.
Paul Francis Paul Francis is not an independent party, and is linked to English Heritage.	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.
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.  The surviving historic character It is too late to designate, as all the key buildings have now been demolished.	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.  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.

Appendix 6

# Old Sarum Airfield Appraisal and Sustainability Appraisal

# Notes of Meeting at Salisbury City Football Club on 26 September 2006

- 1. The meeting was introduced by the Chairman, Councillor Michael Hewitt.
- 2. Eric Teagle, Head of Forward Planning and Transportation, Salisbury District Council, gave a background to the appraisals and an outline of the consultation process.
- Andrea Bradley, Atkins Heritage, gave a presentation explaining the methodology for the survey undertaken, and the criteria for assessment of the character of the airfield and its environs.
- 4. Elaine Milton, Principal Conservation Officer, Salisbury District Council, explained the implications of conservation area designation, and additional planning controls that applied to householders in conservation areas.
- Members of the public were then invited to make comments and ask questions. These were recorded as follows:

#### Tony Markham, Chairman of Laverstock and Ford Parish Council

Mr Markham said he felt that conservation area designation would put a blight on properties. The restrictions were not warranted. A conservation area would remove individual's property rights. He would support anyone wishing to object to the proposals in the parish. He said he spoke on behalf of the parish council (NB. Mr Hannath, the Parish Clerk, clarified after the meeting that the parish council had received the CD, but it had not considered the matter formally, and therefore Mr Markham's comments were his personal comments).

## Peter Shield

Mr Shield would like to see the airfield protected. He queried why the proposed boundary excluded the area north of the Portway, and the former perimeter track at the southern end of the airfield. He believed the proposed boundary would be inaccurate. The proposed boundary currently excluded the former airmens' quarters, the Naafi, officers' married quarters and Ford Farmhouse (the original commanding officer's house). This was an inconsistent approach. Mr Shield also queried whether the Crown's immunity from planning controls would apply.

## David Joyce

Mr Joyce lives in Green Lane. He wanted to know the cost of the exercise to date. He felt that there should not be pressure to agree to the proposals simply because of the costs incurred. He felt that action was too late, and that some of the modern industrial buildings had spoilt the character of the airfield. The buildings in Green Lane were dislocated from the airfield. There would be a potential health and safety issue for visitors if the site were to become an educational facility.

Mr Joyce was concerned over the omission of some of the former MOD properties (he referred, for example to page 29 of the Atkins' report, which mentioned the exclusion of the warrant officers' married accommodation). The approach was inconsistent. He also identified two flaws in the report – 11 Green Lane was actually two semi-detached properties, and it was not the A435, it was the A345.

Mr Joyce said it seemed unfair that people might be faced with further restrictions if a conservation area were designated. Each property owner already took pride in preserving or enhancing their properties.

1

(Andrea Bradley responded regarding the proposed boundary, and said that Atkins had selected the areas which best represented the two key phases of development of Old Sarum (WW1 and the expansion period)).

(Eric Teagle said that if Atkins Heritage were agreeable (as there may be issues of commercial confidentiality) he would provide details of the costs incurred to date with a copy of the minutes).

(Note: After the meeting the contract costs with Atkins to date were established as being £16,955).

## Ronald Rock

Mr Rock was worried about the restrictions placed on satellite dishes within conservation areas. He would wanted to know the total cost of the project cost to date, including manpower.

(Eric Teagle said that although there was no time recording system in use in the Council's Planning Office, he would attempt to provide an estimate of the officer time spent on the project).

(Elaine Milton explained that in certain circumstances planning permission would be required for the installation of a satellite dish in a conservation area. This does not mean that satellite dishes would not be allowed, it would mean that the local planning authority would have to assess the proposal to determine the effect on the character of the conservation area).

## Ray Thomas, Laverstock and Ford Parish Council

Mr Thomas did not receive a CD.

(Eric Teagle apologised for this omission, and said that CDs were available at the meeting to take away if Mr Thomas would like one).

Mr Thomas felt that the conservation area would not result in many additional controls. He said that the MOD might still have a property interest in the airfield, as he believed it might still be available for MOD emergency use. Nevertheless, he felt it was important to retain the airfield use.

Mr Thomas said that he had been concerned over the loss of trees in the past, and, via the parish council, had asked the district council to protect these with tree preservation orders.

## **Gerard Parsons**

Mr Parsons wanted confirmation that the properties in Merrifield Road were not included within the proposed conservation area boundary. He also felt that including the four houses in Green Lane was an anomaly. He supported the conservation area in principle.

(Andrea Bradley confirmed that the properties in Merrifield Road were not within the proposed boundary).

# Angus Beal

Mr Beal said that the Atkins' report was inaccurate in that it mentioned things about the squash courts that were incorrect.

He said that in effect he had not agreed to allow access for Atkins' survey.

Two commercial sites had not been mentioned in the report.

Mr Beal stated that the MOD no longer had a property interest in the airfield, which had been disposed of to the flying club.

The council had never apologised for the failed attempt to designate the conservation area previously.

Mr Beal felt that the rider on the back page of the sustainability appraisal, which claimed that the council was not able to guarantee the accuracy of the report, was very strange.

(Councillor Hewitt said this was standard text on council reports, but this wording would be checked).

Mr Beal quoted from a letter dated 15 January 2002 from Andrew Vines, former Historic Areas Advisor for English Heritage, in which he said that the council intended to re-designate a conservation area at Old Sarum Airfield.

(Eric Teagle said he could not explain Andrew Vine's comments and could not speak for another organisation – he had certainly not advised Andrew Vines that this was the council's intention).

Mr Beal would like to see the previous drafts of the Atkins' reports.

(Eric Teagle confirmed that these would be made available to Mr Beal).

Mr Beal had noted a plan on one of the council's files that indicated coloured zones. He wanted to know who had produced the plan. He did not agree with the way in which the areas have been zoned.

(Andrea Bradley said she was unsure which plan Mr Beal was referring to, and therefore she was unable to answer the question at present).

Mr Beal asked whether a consequence of designation of a conservation area would be that the airfield would not be designated for development within the forthcoming Local Development Framework (LDF).

(David Milton, Team Leader for Forward Planning and Conservation, Salisbury District Council, confirmed that designation of a conservation area would not preclude future development, although it would be a consideration in identifying sites for housing allocation within the LDF. He said that the site selection process had not yet been commenced. There was a requirement for the council to provide 450 new homes each year within the district).

## **Edward Rippier**

Mr Rippier said that he would be concerned that if the flying club went, the area would be threatened and he queried the point of a conservation area if it did not preclude development.

# Sarah Champion

Mrs Champion stated that there was an MOD covenant on the airfield that would prevent development taking place.

(Mr Beal said that there was a clause within the covenant that meant that MOD could be entitled to 60% of any development value. The MOD therefore had an interest in the land being developed).

## Chris Brownhill

Mr Brownhill was unhappy that he had received a CD, because when he printed the report it came to many pages. He did not feel it was fair to expect people to print out the whole document.

Mr Brownhill raised concerns regarding additional restrictions that would be imposed on people within the conservation area. He also stated that the guardroom no longer existed.

(Eric Teagle said the CDs had been sent out to ensure that people were properly informed about the proposals. The council has attempted to make people aware of the proposals through a number of different means.

Eric Teagle reiterated the purpose of the consultation was to seek views about whether a conservation area should be designated and if so, what the boundary should be. He said that the minutes would contain a clarification of the implications of conservation area designation).

## Tim Cottis

Mr Cottis said he had an enormous interest in the role of the airfield. He had been impressed by the Atkins' report and the historic background of the airfield. He felt that the airfield was of national significance. He said he had some sympathy with householders and businesses who might be faced with restrictions as a consequence of conservation area designation. However, he would support the proposals if he felt assured that the designation would result in an enhancement of the area. He believed that a parallel plan for the enhancement of the area would be required.

#### David Pullen, Stratford-Sub-Castle resident

Mr Pullen said that Stratford-sub-Castle, despite being a conservation area, had been blighted by aircraft noise. He was concerned that a consequence of conservation area designation at Old Sarum Airfield might be that aeroplane activity might be maintained. He said there did not appear to be any means to prevent the constant use of the site for flying. The current voluntary agreement had been of little effect. It was understood that the Blanefield Property Company intended to take back the lease from the current flying club and wanted to install two flying clubs. There would be no restrictions on flying, and there could even be 24 hour flying. Salisbury District Council would be able to do nothing to prevent it. He would be support a conservation area if SDC were able to impose restrictions.

# Ron Champion

Mr Champion supported the proposed conservation area designation, although he did not agree with the proposed boundary. He queried how landowners could be made to enhance their areas.

(Eric Teagle replied that conservation area designation would not result in any power to force individuals to enhance their properties. He also stated that the council was involved in a forum with the flying club, and tried to seek restrictions on flying times: The council had been successful in achieving this to some degree. The council had no information regarding the suggestion the use of the site for two flying clubs).

(Elaine Milton said that existing uses would not be affected by conservation area designation. Proposals for development would be considered against whether the character of the conservation area would be preserved or enhanced).

(David Milton also said that the council had set up a forum with the flying club. Sensitive noise reporting had been carried out by the environmental health unit of the council. If residents considered that there was a statutory nuisance then they could log complaints with Gary Tomsett, Environmental Health Officer, who would then carry out an investigation).

## Gerald Steer, Stratford-sub-Castle

Mr Steer agreed with Mr Pullen. He said that he had been told that noise over 110 decibels had been recorded by a neighbour. This had been reported to the environmental health unit,

but because the noise level had not been recorded officially by the council, no further action had been taken. He said that there could be aircraft overhead every two minutes.

(Eric Teagle said that he was unable to respond on behalf of his colleagues in the environmental health unit, but that there were procedures in place for investigations to be made).

## Mr Pearce

Mr Pearce said that his main concern was with potential development on the airfield. He was worried that conservation area designation would not prevent the airfield being developed for housing and queried the point of the exercise.

## Councillor McLennan (District Councillor for Laverstock)

Councillor McLennan also queried the point of conservation area designation. It would appear to be restrictive, but would not necessarily result in any enhancement.

(Councillor McLennan would like to clarify that the emphasis of this minute is inaccurate, as he did not present a bias in any way for or against the proposal. He asked a question at the meeting, and did not query the point of designation. He wanted to know whether there were any positive aspects of designation as these did not seem to have been highlighted).

(Eric Teagle stated that in planning terms it was difficult to give a precise answer about the future of the airfield, as it was impossible to predict future policies or forthcoming proposals. He emphasised the importance of the relationship of the built form and the grass airstrip, and that this was a unique feature of the area).

(David Milton commented that the airfield lies outside development boundaries. Notwithstanding whether the area was designated as a conservation area or not, development on the site for housing would be contrary to current planning policy).

(Eric Teagle followed this comment by saying that this was the current situation and that all development boundaries would be reviewed in light of the Regional Spatial Strategy housing requirements, and that previously rejected sites for housing may need to be allocated to meet the need).

## Other Comments

Concern over the omission of houses to the north of the Portway.

(Andrea Bradley replied that the study area had been much wider than the proposed conservation area boundary and that the boundary was drawn up in accordance with a robust set of criteria. The area to the north of the Portway had been discounted because it did not meet the tests required for conservation area designation).

(Eric Teagle invited comments to be made in writing regarding the proposed boundary, and that these would be given due consideration).

Concern was raised that this proposal might be a mistake by the council.

Mr Beal stated that aviation noise was exempt from current regulations. He also said that alterations have been carried out to Hangar 3 without listed building consent.

(Eric Teagle commented that unauthorised works should be reported to the Planning Office's enforcement section for investigation).

It was also queried whether there was a wholly altruistic reason for proposing conservation area designation, or was it simply being proposed to prevent development on the airfield?

It was stated that the whole of the airfield should be surveyed – this did not appear to have been done.

(Andrea Bradley replied that the whole of the airfield had been surveyed, although she conceded that some areas may need to be re-examined in the light of comments being received).

(Eric Teagle said that one of the issues that seemed to have emerged during the course of the meeting related to consistency of properties chosen to be within the boundary and those that were being left out. We would take note of these comments and those submitted during the rest of the consultation process and if the boundary was a clear issue he would consider asking Atkins to re-appraise the area).

It was stated that there were good distant views of the airfield from across the valley.

It was asked who would ultimately determine the conservation area boundary? Would it be Atkins or the council?

(Eric Teagle replied that Atkins had provided an independent specialist recommendation to the council. Once all the consultation responses had been received, Atkins would be asked to comment on these and recommend whether conservation area designation was still appropriate, and if so, where the boundary should be. The decision regarding whether the area should be designated a conservation area or not would ultimately be made by the council's Cabinet, which would be a well-informed decision based on the advice of Atkins and the outcome of the consultation).

It was asked whether the property owners of the four houses in Green Lane would be steam-rollered by the council just because they were a minority voice?

(Eric Teagle responded that the small number of residents there would be recognised, and their comments given due weight).

It was asked whetherthe status of the unadopted road would be changed if a conservation area was designated?

(Eric Teagle said that conservation area status would not mean that the road would become adopted).

It was asked whether Atkins would be required to carry out another technical study of the area or reappraisal?

(Eric Teagle confirmed that he would ask Atkins carry out additional work if this was appropriate in light of the comments received).

Mr Beal asked whether the council had carried out similar studies on other historic airfields in the district, e.g. at Zeals?

(Eric Teagle replied that the other areas mentioned by Mr Beal had not yet been looked at. The catalyst for looking at Old Sarum was the English Heritage report into historic military airfields, which highlighted the national importance of this group).

Please Reply to:

Swindon

Our Ref:

MMW/we/C1531

Your Ref:

Date:

9th October 2006

Mrs E Milton Principal Conservation Officer Salisbury District Council Planning Office 61 Wyndham Road

Salisbury SP1 3AH

Salisbury District Planning Department Sec. 10 887 2006 Actinopolesigned \_\_\_

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Dear Mrs Milton

Draft Minutes of Public Meeting on 26th September 2006

These appear a generally faithful record of the discussion at the meeting I observed only but took notes and the main differences/omissions in factual content I identify are as follows: (NB responses from SDC/Atkins are made under the name of the last commentator):

Peter Shield, 11 Green Lane

Mr Shield's reference to exclusion of the strip of land at the southern edge of the airfield in MOD ownership from the proposed Conservation Area boundary has been omitted.

Peter Shield/David Joyce

At this point, Andrea Bradley's response to comments on the apparent inconsistencies of the recommended Conservation Area boundary was that it is selective - of the areas which best represented the two key phases of development of Old Sarum Airfield (WWI and expansion period) - but Atkins may need to look again at rationale.

Ray Thomas, Laverstock & Ford PC

Mr Thomas also commented on the District Council's initial disinterest in protesting trees on the site.

Angus Beale

In addition to the apology comment, Mr Beale also asked for publication of the total costs associated with the quashed 2001 designation.

Councillor McLennan (Laverstock)

Mr Milton stated that the site lies outside development boundaries. It was Mr Teagle who emphasised that this was the current situation, that boundaries (and policies) would be subject to review in light of RSS housing requirements and that previously rejected sites may need to be allocated.

cont/d...

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Page 2 9<sup>th</sup> October 2006

Mrs E Milton Salisbury District Council



# Other comments:

- North of Portway One commentator felt this was an area that would benefit from enhancement. Andrea Bradley did state that this area was rejected from a heritage point of view but earlier she had commented that North of the Portway you do not feel as if it is in the airfield.
- Determination of Conservation Area this is a partial response. Mr
  Teagle additionally stated that, ultimately, it is an SDC decision which
  would be well informed based on (Atkins) expertise and consultation.

Finally, there is insufficient record of comments in the introductory presentations and later discussion about the impartiality/independence of Atkins' work and specifically that the Council had not provided any guidance/information other that the study brief and a map of sites to which survey access had been granted.

If you have any queries please do not hesitate to contact me.

Yours sincerely

M M Wood

Principal Planner

Development Planning & Design Services Ltd

mwood@dpds.co.uk

igate Word

cc. Grenville Hodge, Blanefield Property Co.

# OSAF Projects Ltd 8 Pauls Dene Crescent Salisbury Wiltshire SP1 3QU

Tel 01722 335975 Fax 01722 339160 e-mail osafprojects@tiscali.co.uk

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Mrs E Milton
Principal Conservation Officer
Salisbury District Council
Planning Department
61 Wyndham Road
Salisbury
SP1 3AH

12th October 2006



Dear Mrs Milton

# Old Sarum Airfield Appraisal Public Meeting 26th September 2006

The letter accompanying the draft minutes asked for comments on the factual accuracy of the minutes by tomorrow's date.

Having spoken to other participants I hope that they will be writing to you with comments about their own points. I must add that I feel that the Council should make a public note that the groundswell of opinion was against the designation of a conservation area, albeit for a number of reasons.

Your minutes do not reflect the number of times that the Atkins team were unable to give specific accurate information when asked, or in some cases challenged, about general issues or statements made in the report. The role Mr Paul Francis took in the process of appraisal was also not properly explained. There is no mention of my request that the Birtles report be published.

# Angus Beal (page 3)

Mr Beal mentioned that the Atkins' report was repeatedly inaccurate, and sited specific items about the squash courts as one example.

He said that he had asked Mrs Milton to close out other issues before granting access for the purpose of appraisal, and explained that he had discussed this formally with the Head of Legal and Property at the time.

Mr Beal stated that the MOD no longer had an interest in the airfield, which had been disposed of by tender in 1995 and bought, as he understood it, by a syndicate of members from the flying club.

Mr Beal questioned whether the Council should be carrying out the proposed designation when the Sustainability Appraisal carried a disclaimer on the back page that absolved it of any blame should the report be flawed or inaccurate.

(Councillor Hewitt said that this was standard text on council reports, but this wording would be checked)

Development Projects for Old Sartim and Ford

NOTE: - Councillor Britton has since written to me stating that reports published by the council or its officers seldom if ever has a disclaimer. He assumed that the disclaimer was on the report by the consultants and that the council could therefore not be expected to guarantee it.

# Sarah Champion (page 4)

Mrs Champion stated that there was an MOD covenant on the airfield that would prevent development taking place (and then waved a copy of the conveyance relating to the land owned by Mr Beal's company)

(Mr Beal said that although there was a covenant, the MOD had already conceded that they were agreeable to this being set aside in return for a percentage of the uplift in value should the land gain planning consent. He stated that negotiations were not concluded, but that The MOD had started with a figure of 60%. This demonstrated that they had a financial interest in the land being developed.)

# Other Comments (page 6, 7 and 8)

# Page 7

Mr Beal stated (in reply to an issue raised by another participant) that noise from light aircraft was currently exempt from normal legislation. He explained that fitting noise limiting equipment to aircraft would be onerously expensive and would be likely to 'kill' the industry. He also said that he was surprised that this process was being carried out when the council had done nothing about the unauthorised alterations to Hangar 3 despite it being grade II\* listed and described in a report authored by Mr Teagle as being 'of National importance'.

(Mr Teagle commented that unauthorised works should be reported to the Planning Office's enforcement section for investigation)

I take particular exception to this statement by Mr Teagle. I have been repeatedly informing the council about the works to Hangar 3 since 1995. This has been in writing, in meetings with councillors, in meetings with officers including yourself (October 2001). The policy director told me in writing in March 2001 that the then extant conservation area would serve to give protection more weight. You and your departments have ignored all illegal works to Hangar 3, whilst rather perversely working up a scheme for conservation area designation. I feel that this should be detailed in your report in order that it gives a true reflection.

It was stated that there were good distant views of the airfield from across the valley.

Who made this statement? As I recall it was made by the panel in response to a comment I made that it was almost impossible to see the site without trespassing especially once the hedge established itself and that the public benefit described in the Sustainability Appraisal report was a misnomer due to the total area of the site being private property.

## Page 8

Mr Beal asked Mrs Milton whether the brief for the designation appraisal was visual or historic, bearing in mind her rejection letter to other tender participants.

(Mrs Milton conceded that it was both, but the historic aspect was a most important consideration)

Mr Beal then asked that if this was in fact the case, when the council were carrying out appraisals of all the other historic aviation sites within the district, and why was Old Sarum the first on the list. Mr Beal quoted Zeals, New Zealand Farm, Oatlands Hill, and others as examples. Mr Beal involved Mr Francis in this issue, as he was able, and in fact did confirm that the flying field and control tower, along with many technical buildings survive at Zeals. (This was I believe the only involvement Mr Francis made in the meeting)

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(Eric Teagle replied that the other areas mentioned by Mr Beal had not yet been looked at. The catalyst for looking at Old Sarum was The English Heritage report into historic military airfields, which highlighted the national importance of this group).

Mr Beal then asked was this the Lake 2000 report as detailed in the Atkins report, or the Lake 2003 report as mentioned elsewhere.

(Andrea Bradley said that they were the same document, but although the document was compiled in 2000 it was issued in 2003.)

Mr Beal asked Andrea Bradley what weight the Lake report carried, was it now published and adopted as a definitive reference work.

(Andrea Bradley said that the work was published in 2003 by English Heritage and that it was used as a reference document)

These are my comments and I ask that you include them fully in the report. I again stress that I feel the report should clearly detail the fact that at least eighty percent of people present at the meeting were against the designation.

I have taken care not to attempt to correct inaccuracies pertaining to the comments of other participants; hopefully they will feel strongly enough to correct you personally.

There is one further issue that I wish to raise about the costs involved. Mr Joyce (page 2) raised the issue of costs and Mr Teagle has seen fit to publish a figure. I asked Mr Teagle in the meeting that seeing as he was willing (subject to Atkins not raising an objection) to publish the costs of this 'round' he should publish an honest account of how much the previous (2001) designation had cost the taxpayer. This issue has not been reported in your minutes at all.

Should any of the above comments need further explanation, please do not hesitate to contact me.

I will be submitting my response to the consultation exercise separately, especially in respect of the proposed boundary. Hopefully as the boundary is without doubt a clear issue Mr Teagle will be asking Atkins to re-appraise the area as he suggested he would in page seven.

Yours sincerely

Angus Beal

Cc John Crawford SDC Legal and Property

Development Projects for Old Sarum and Ford

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Acknowledges

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Action

# THE IMPLICATIONS OF CONSERVATION AREA DESIGNATION

## What is a Conservation Area?

A conservation area is an area of special architectural or historic interest, the character or appearance of which it is desirable to preserve or enhance. This means that when a conservation area is designated, the Council has recognised that the area has a special character and identity, which is worth protecting. There are 69 designated conservation areas within Salisbury district.

## The Legislation

Current legislation relation to conservation areas is contained within the Planning (Listed Buildings and Conservation Areas) Act 1990, the effects of which are explained in Planning Policy Guidance Note 15.

Planning and the Historic Environment (PPG 15), published September 1994, and also in Environmental Circular 14/97 Planning and the Historic Environment Notification and Directions by the Secretary of State, published August 1997.

## What does Conservation Area Designation Mean?

The Council is required, by legislation, to seek the preservation or enhancement of the special character of each conservation area. Proposals for change of use or for new development have to be considered in the light of this requirement.

Conservation area designation helps to protect an area's special architectural or historic interest by providing:

- The basis for policies designed to preserve or enhance all aspects of the character or appearance of an area that defines its special architectural or historic interest
- Control over the demolition of unlisted buildings and works to trees within a conservation area
- Stricter planning controls within a conservation area.

Whilst it is true that conservation area status may be accompanied by added restrictions, and possibly extra expense, there are a number of benefits of living or working within a conservation area.

- 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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## **Managing Change in Conservation Areas**

The intention of Conservation Area designation is not to inhibit further development, or to preserve the area unaltered, but to ensure that the character of the area is strengthened and not diminished, by future development.

In practice, this can be achieved by the preparation of a character appraisal for each area, by creating specific policies and prudent development control.

## The Special Character of Conservation Areas

When a conservation area is designated it is the character of the area, the familiar and cherished local scene that conservation area designation seeks to protect. The special character of these areas comes from: the quality of their buildings; the historic layout of road and boundaries; characteristic building and paving materials; the particular mix of building uses; public and private spaces; the history of the place which gives rise to a particular pattern of development; the 'sense of place'; the setting of buildings; the palette of materials; and the social significance of the area.

Conservation areas give broader (but less onerous/prescriptive) protection than listing individual buildings: all the features, listed or otherwise within conservation areas are recognised as part of its character (although clearly there will be some built features that will detract from the character of an area).

## Control of Works to Dwellinghouses in Conservation Areas

In addition to the regular planning controls, planning permission is required for certain external works to a dwellinghouse with a conservation area, which includes house extensions of more than 50 cubic metres or 10% of the original dwellinghouse (whichever is the greater) and subject to certain restrictions including:

- The cladding of any part of the exterior
- Any addition or alteration to the roof (not the repair of)
- The erection within the curtilage of the dwellinghouse of a building eg a garden shed, which is larger than 10 cubic metres
- The installation of an antenna (satellite dish) on a chimney, or on a building that exceeds 15 metres in height, or on a wall or roof slope which fronts a highway.

## Control of Works to Flats and Commercial Properties in Conservation Areas

If you are an owner or tenant of a commercial property or a flat, you are already governed by the regular planning controls, and most external alterations (such as the erection of a satellite dish) require planning permission.

# Checking with the Planning Office (Development Services)

These additional planning controls which apply in conservation areas are only a summary. We recommend that you always check with a planning officer, who can be contacted on telephone number 01722 434541 (NB. please ask for the Duty Officer when calling).

## **New Development in Conservation Areas**

Where the council considers new development to be appropriate, a high standard of design is expected. The council's expectations regarding design (whether inside a conservation area or outside) can be found in 'Creating Places: A guide to achieving high quality design in new development' – the council's design guide. This can be accessed via the website (www.salisbury.gov.uk). Initial informal design advice for development in conservation areas can also be obtained by contacting the Planning Office on 01722 434541.

In general the Council will require new building work to preserve or enhance the existing character or appearance of the conservation area. Special regard should be given to such matters as scale, height, form, massing, detailed design and quality of materials, in the interests of harmonising the new development with its neighbours. Density of development is an intrinsic part of the character of conservation areas. Proposals to subdivide grounds or large gardens will not normally be permitted unless it can be demonstrated that such proposals will not harm the character or appearance of the conservation area.

## **Control of Demolition in Conservation Areas**

Designation introduces a general control over the total or substantial demolition of unlisted buildings of 115 metres cubed or greater and some boundary walls (see below). Such control provides the basis for policies designed to preserve and enhance all the aspects of character or appearance that define an area's special interest. Conservation Area Consent would be required from the council for the total or substantial demolition.

## **Control of Demolition of Boundary Walls in Conservation Areas**

Conservation Area Consent is also required for the demolition of walls which are in excess of 1 metre high that adjoin a highway, open space, or for the demolition of walls more than 2 metres high elsewhere.

## **Conservation Area Consent for Demolition**

In assessing whether or not to grant Conservation Area Consent the local planning authority will have regard to the desirability of preserving or enhancing the character or appearance of the conservation area in which the building/structure is situated.

The local authority or the Secretary of State may take enforcement action or institute a criminal prosecution if the demolition works are carried out without first obtaining the necessary consent. It should be noted that if the property is a listed building, in ecclesiastical use, or a scheduled ancient monument, different legislation applies, details of which can be obtained from the Planning Office (Development Control telephone number 01722 434541).

## **Works to Trees in Conservation Areas**

It is the whole character and appearance of conservation areas that the local authority seeks to preserve or enhance, not just the character of the individual buildings within them. A major element of the character and appearance of many conservation areas is the trees and gardens within them. Therefore, ill-considered works to trees may not only lead to the loss of the trees themselves, but also ruin the appearance of the area, and spoil the setting of any buildings nearby.

All trees with a trunk diameter of 75mm measured at 1.5m above ground level within conservation areas are protected. Any works to them, which include pruning and felling, will require a written notification to the Council six weeks prior to commencing those works.

## Exemptions are

- Trees that are dead, dying or that have become dangerous.
- Pruning of fruit trees in accordance with good horticultural practice to prevent or control a legal nuisance.
- Where the loss of a tree is unavoidable, replanting with species that are native or traditional to the area will be encouraged.

# **Caring for Conservation Areas**

The designation of a conservation area should help to preserve the special character particular to a locality.

It is important, therefore, that amenity groups, residents' associations and local people are involved to ensure standards are maintained and enhancement targets achieved.

Small-scale enhancement schemes, such as the reintroduction of traditional paving materials, or more appropriate but efficient street lighting, are often beneficial to the appearance of a conservation area.

There are many instances when a seemingly small alteration can enhance the character and appearance of an area.

## Where to Get Copies of Legislation and Guidance

The Planning (Listed Building and Conservation Areas) Act 1990, can be viewed on the following website: http://www.opsi.gov.uk/acts/acts1990/Ukpga\_19900009\_en\_1.htm

Planning Policy Guidance Note 15: Planning and the Historic Environment (PPG 15) can be viewed on the following website: http://www.communities.gov.uk/index.asp?id=1144041.

## Contacting the Planning Office for Advice

For further information on planning related issues or Conservation Area Consent please telephone the Planning Office 01722 434541 and ask for the Duty Officer

Or email: developmentcontrol@salisbury.gov.uk

Or write to:
Development Services
The Council Offices
61 Wyndham Road
Salisbury
Wiltshire SP1 3AH

For further information on Conservation Area designation and advice about listed buildings, please telephone 01722 434362 and ask to speak to a Conservation Officer,

Or email: forwardplanning@salisbury.gov.uk

Or write to:
Forward Planning
The Council Offices
61 Wyndham Road
Salisbury
Wiltshire SP1 3AH