

## Appendix 4

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

#### Summary of Issues Raised:

ISSUE RAISED	NO. OF RESPONSES	OFFICER COMMENT
<p>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?</p>	<p>1</p>	<p>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.</p>
<p>There is a sloppiness in presentation</p>	<p>1</p>	<p>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'.</p>
<p>Inadequacy of options explored</p>	<p>1</p>	<p>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.</p>
<p>The Appraisal may not be required</p>	<p>1</p>	<p>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.</p>

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.
<b>SDC Sustainability Objective 1: to develop vibrant, sustainable communities.</b> 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.
<b>SDC Sustainability Objective 2: Providing Affordable Homes</b> 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.

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

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

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

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