

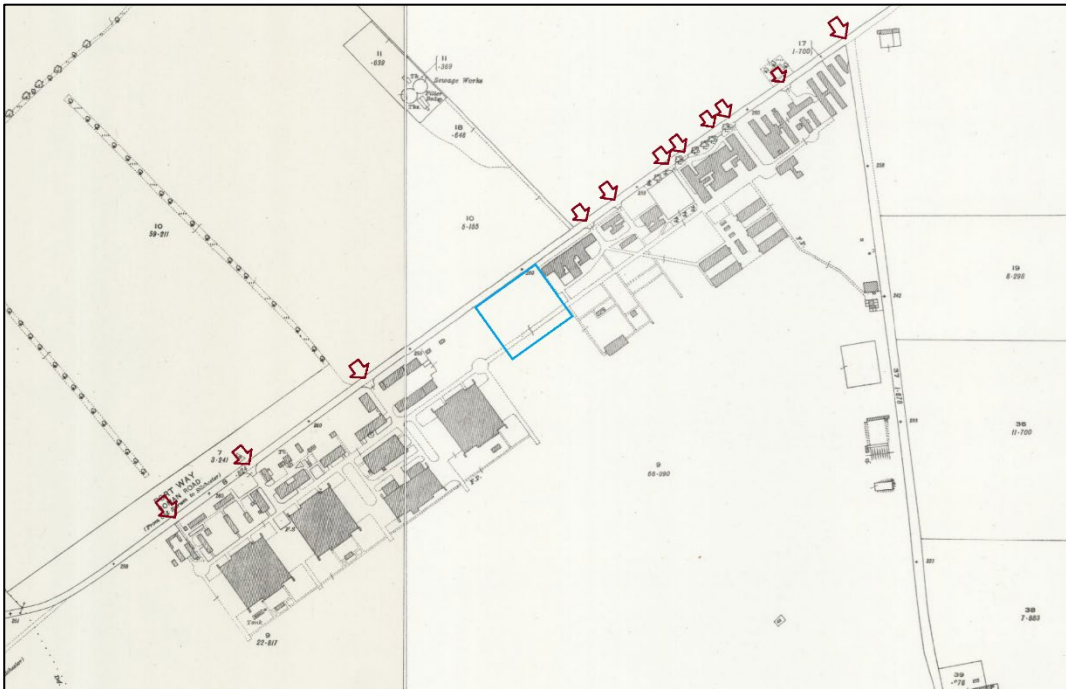
Re: Portway House, Old Sarum Park – Response to the Conservation Consultation comments dated 20/04/2026 on planning application PL/2026/00652

Please find below our response to the Conservation Consultation comments by Andrew Minting, Conservation Officer at Wiltshire Council, dated 20 April 2026 related to planning application PL/2026/00652. The Conservation Consultation text is presented below in *black italics* with our response in **blue**.

Historically the airfield buildings have only been accessible from the internal airfield roads. The only exception to this is the Station HQ (now TA building) which became the main access point when constructed in 1935 - this access now only serves the TA building.

We have found evidence that contradicts this statement.

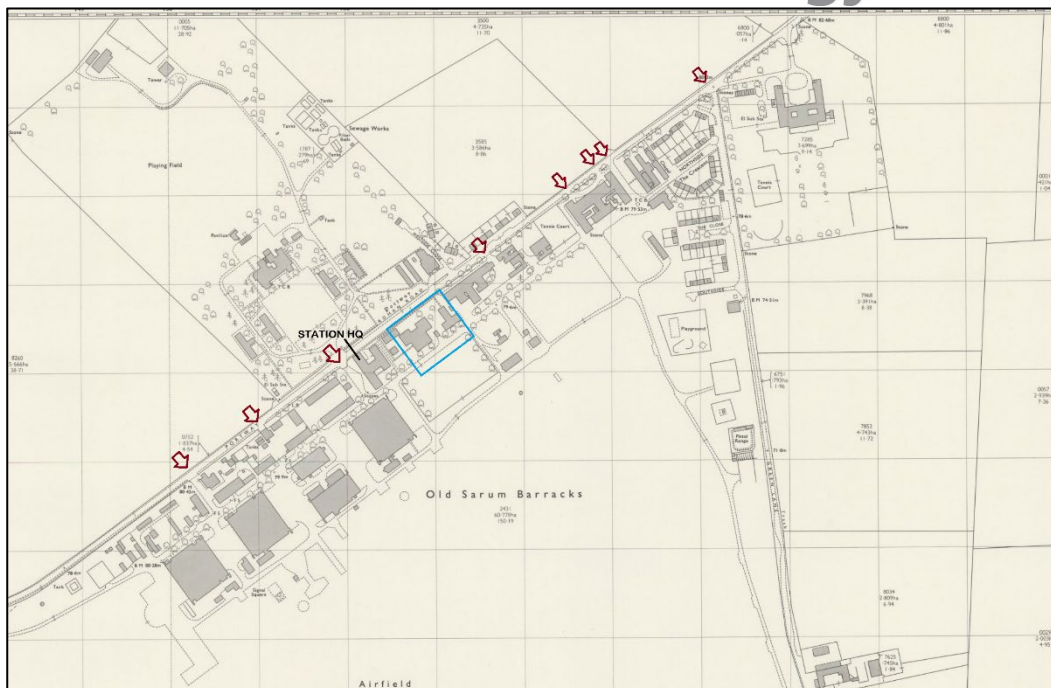
Historic maps and aerial photographs show multiple external access points into the airfield from the Portway road, as well as the internal airfield roads. Eight or more external access points are evident on the OS maps published in 1926 and 1975, as well as on mid-C20th aerial photographs, such as the one below.



1926 1:2500 scale OS map (revised 1923).

External access points from Portway to Old Sarum Airfield are marked 

The (future) location of Portway House is marked by a blue rectangle.



OS 1:2500 scale map published 1975 (revised 1973).



Aerial photograph dated 11 October 1945 (Historic England Aerial Photo Explorer ref. RAF/106G/UK/915)

This controlled enclosure of the site reflects its historic military use and gives the area a more clearly defined area than if buildings along the Portway were to have direct accesses.

The enclosure of Old Sarum Airfield was not always as tightly controlled as the Conservation Officer suggests. From historic mapping and aerial photographs, it is evident that while under military control the airfield had more external access points than at present, and that there was a mix of access points to individual buildings (not just the former station HQ (now TA building)) and to the airfield as a whole via the internal network of roads. The current access arrangement likely post-dates the military occupation of the site which ended in 1979 and the creation of the Sarum Business Park and Old Sarum Park in the later 20th century.

Therefore, the statement from the Conservation Officer is incorrect as the current access arrangement is relatively recent.

I consider that the proposal would fail to preserve the character of the CA and setting of the grade II listed building by its erosion of the legibility of the defined area of the CA and impact on the hierarchy of the CA's administrative buildings

Special interest and character of the Conservation Area

The 2015 Feilden + Mawson Conservation Management Plan (CMP) summarises the heritage significance of the Old Sarum Airfield conservation area as follows:

The aerodrome at Old Sarum is of great local and national importance for historic, architectural and cultural reasons. Its physical fabric embodies key changes in the practice of military aviation, and it manifestly represents the earliest period at which durable (if not intentionally permanent) buildings were routinely erected on military airfield sites. It stands for the formalisation of airfield design and facilities after the early years of essentially ephemeral experimentation. More specifically...Old Sarum belongs to a group of airfields which collectively can be linked to the birth of fixed wing military aviation.

In 2014, the airfield was described by English Heritage as ‘*the best preserved flying field of the First World War period. It is bounded by one of the most complete suites of technical and hangar buildings of the period*’ (English Heritage *Historic Military Aviation Sites Conservation management guidance*, draft for external consultation, July 2014 cited in Feilden + Mawson 2015).

However, since these documents were produced, the airfield was formally closed (in October 2019) and the ‘most complete’ aspect of its significance has been diminished due to the destruction of Hangar 3 by fire in April 2025. This follows on from the destruction of Hangar 1 in 1987. The closure of the airfield and loss of these prominent heritage assets has negatively affected the overall special interest of the conservation area and particularly the group value and architectural interest of the listed hangars.

Portway House is located within the former airfield administrative area, which ‘*is the one part of the airfield that does not retain its original appearance and character, due to the intrusion of industrial and commercial development of Old Sarum Business Park.*’ (Atkins 2006 and Feilden + Mawson 2015). *The road layout within the [administrative] area has been significantly altered by the construction of these [modern industrial and commercial] buildings. Views that were once open to the flying field from this area have also now been obscured* (Feilden + Mawson 2015).

In terms of historic interest, ‘*the airfield played an important early role in the training of Britain’s airborne forces, played a part in international events during the two World Wars, and contributes to the military character of the region.*’ (Atkins 2006).

The proposed new access to Portway House from the Portway will not diminish or obscure the historic interest of the conservation area as a training airfield or alter our understanding of the airfield's role in the two World Wars. The conservation area's architectural interest as a largely complete WWI airfield and its historical association with the development of aviation will be maintained with no change.

Legibility of the defined area, and hierarchy of the CA's administrative buildings

The Grade II listed former station HQ (now TA building) was the principal building in the airfield's administrative area. The Army School of Cooperation and Medical Centre that now form Portway House are located in the same area but the buildings are now disconnected from one another, and are approached via different routes.

The 2015 Feilden + Mawson CMP states:

A large modern fence now blocks the road linking the army school (Wessex Archaeology) and the station HQ and Technical Area. The station HQ is also surrounded by a 7ft high brick wall topped with barbed wire, which divorces it not only from the Army School, but also from the rest of the airfield.

The principal façade of the listed former station HQ building faces west, away from Portway House, with fencing and modern extensions on the rear/east side of the listed building which infill the area between the two historic structures. This physical and visual separation weakens the understanding of these buildings as an administrative group. The setting and focus of the former station HQ building is to the west and south towards the surviving technical area buildings and the flying field, rather than behind to Portway House, which is now separated from it and accessed separately through the industrial estate.

If Portway House were to gain a new entrance from the Portway, this would not affect the appreciation or understanding of the significance of the listed building as the former station HQ, and it would have no impact on the circulation around the rest of the airfield as the new entrance would only serve Portway House. The vast majority of traffic circulation around the former airfield would not be affected and the current access points and approaches to the listed building would not change.

The character appraisal written to assess the eligibility of Old Sarum Airfield as a conservation area (Atkins 2006) states that '*all four functional areas [of the military airfield] can still be understood and appreciated in the buildings and spaces that we see today*', but the subsequent CMP by Feilden + Mawson (2015) differs and assesses these areas as lost and not well defined:

Since the Army sold the aerodrome the clear distinction between the four main functional areas has been lost...New fencing breaks up the site into a series of enclosed pockets...

However, both the Atkins appraisal and Feilden + Mawson CMP agree that:

The sub-division of [the western end of the Technical] area and the Administrative Area, with new fences and walls, makes the original layout [of the airfield] hard to decipher. The once clear cut boundary of the built up part of the airfield at the eastern end of the Administrative Area is now extended and blurred.

Particularly in the Administrative Area...the airfield does not retain the feel of a military site, and has lost much of its original character.

The conservation area boundary omits former parts of the airfield that were redeveloped in the late 20th century onwards, so not all of the functional areas of the airfield (flying field, technical area, administrative area, domestic area) are represented in the conservation area, and both the technical and administrative areas have been subdivided and eroded by development since the Army left the

site in 1979. It is worth noting that, as per paragraph 220 of the NPPF, not all elements of a conservation area contribute equally to its special character and appearance.

Our assessment is that while the new entrance will be a minor change within the setting of the former Station HQ listed building and to the Old Sarum Airfield Conservation Area, this change will not impact the heritage significance of the listed building or how it is appreciated, and it will not erode the legibility or special character or appearance of the conservation area. A new entrance from the Portway to the rear of Portway House will make this rear elevation more visible from the road, but it is unlikely to raise the importance of Portway House above that of the former Station HQ which was purposefully situated to be viewed, admired and approached from the Portway.

Conclusion

In conclusion, the available historic mapping, aerial photographic evidence and published heritage assessments do not support the view that the proposed access would erode the special character or appearance, legibility or significance of the Old Sarum Airfield Conservation Area, or harm the significance of the Grade II listed former Station HQ through a change within its setting. Rather, they demonstrate that multiple external access points historically existed from the Portway, and that the present restricted access arrangement is a comparatively recent arrangement within an administrative area already altered by later development, subdivision and enclosure.

The proposed access to Portway House would represent a minor localised change which would neither diminish the heritage significance of the conservation area nor impact the heritage significance of the listed building or how it is appreciated. For these reasons, we consider that the Conservation Officer's concerns are overstated and that the proposal should be regarded as acceptable in heritage terms, complying with the NPPF, National Planning Practice Guidance and Sections 72(1) and 66(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990.

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