

05 October 2023

The Planning Inspectorate  
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Temple Quay  
Bristol BS1 6PN

By email only: [section62a@planninginspectorate.gov.uk](mailto:section62a@planninginspectorate.gov.uk)

Dear Sirs,

Planning Application reference: S62A/2023/0022

London Stansted Airport, Bassingbourn Road, Essex CM24 1QW.

For and on behalf of Stansted Airport Limited (STAL), I write to respond to the consultation responses received from Historic England ('HE') and the Twentieth Century Society ('TCS') regarding the above application, dated 22 September 2023 and 21 September 2023 respectively.

This cover letter provides a summary of the key matters that we respectfully request that the Inspector takes into account, with detailed commentary on both responses also appended for consideration.

### Summary

The terminal building is not a Listed Building, nor is it located within a Conservation Area. As such, Paragraphs 199 and 200 of the NPPF, as referenced by both HE and TCS, are not applicable to the consideration of this application, nor are the statutory duties of the Planning (Listed Buildings and Conservation Areas) Act 1990 (also erroneously referred to by HE).

We understand that the TCS have stated that they intend to submit a listing application to Historic England. However, at the date of writing (5<sup>th</sup> October 2023) we have not been notified by HE that an application for listing has been submitted by the TCS, or any other party.

Even if a listing application had been submitted, this does not automatically introduce any interim protection to the terminal building whilst HE considers the listing application, nor introduce a statutory requirement to hold the planning application in abeyance.

We acknowledge, as detailed within the submitted Heritage Statement prepared by Archaeological Research Services Ltd., that the building represents a non-designated heritage asset in terms of the NPPF.

Accordingly, any potential impacts to the significance of the terminal building – which the Heritage Statement identifies as minor - should be considered within the context of Paragraph 203 of the NPPF. High Court Judgements have confirmed that when considering potential impacts on non-designated heritage assets within the decision-making process, the balanced judgement required under Paragraph 203 is different from the public benefits exercise associated with designated heritage assets (as set out in Paragraphs 201 and

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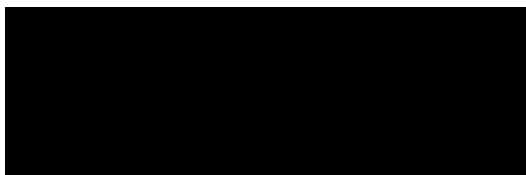
202 of the NPPF). Specifically, within a High Court Judgment of 2017, Jarman HHJ confirmed that the only requirement of the NPPF in respect of non-designated heritage assets is that the effect of an application on the significance on a building should be taken into account, "*nothing more, and nothing less*".<sup>1</sup>

With specific regard to the design of the terminal building and the scheme proposed under this application, the following key points are made:

- The building, as designed by Foster and Partners, was designed to change and adapt to the changing needs and evolution of the airport.
- The building as currently built, has been subject to several phases of internal and external alteration since it opened in 1991. Of particular note, is that the building as originally constructed was square in plan (11 bays by 11 bays) but is now rectangular (11 bays by 17 bays) as a result of extensions in the early 2000's.
- The 'vision' of Foster and Partners in designing the terminal building was to ensure seamless flow and movement of passengers through the building, and the wider airport complex.
- The Track Transit System (TTS) is one part of the overall design of the airport terminal building and the wider complex, and when considered within the context of these as a whole, is not the most important element architecturally.
- In the context of the airport terminal and complex as now operating (taking into account how the airport has evolved and expanded since the terminal building was designed), the TTS now acts as a 'pinch point' and hinders passenger movement through the terminal and wider complex. Thus, the TTS as now operating is contrary to the 'vision' of Foster and Partners.
- The functionality of the TTS is time-limited and it is approaching the end of its lifespan.
- A solution is therefore needed in order to ensure the continued efficient operation of the terminal building - both within the context of the current operational requirements and the approved expansion of the airport – and to ensure the preservation of Foster and Partners 'vision' of flow and circulation. It is such a solution that the current scheme provides, with the proposals based upon the detailed knowledge and understanding of the airport company regarding passenger flows, behaviour and expectations.
- Following the careful assessment of options, the application proposals represent the optimum way to expand to accommodate consented passenger growth.
- In this regard, and with all due respect to HE and the TCS, the understanding and knowledge of the applicant is far greater, and we invite the Inspector to take this into account when viewing comments made by the parties on airport operations and alternative options.

We trust that this response will assist the Inspector in their consideration of the application.

Yours faithfully,



Andy Thompson, MRTPI  
Planning Manager  
London Stansted Airport

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<sup>1</sup> Travis Perkins (Properties) Limited v Westminster City Council [2017] EWHC 2738 (Admin), Paragraph 46.

## Response to Historic England Comments dated 22 September 2023

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'In 2021, permission was granted for the annual passenger cap to be increased from 35 to 43mppa. This latter figure is considered the maximum throughput the airport could achieve with a single runway and represents a substantial increase to the original capacity for which the terminal was designed'

It is indeed the case that the approved passenger capacity (43 mppa) is above the capacity the terminal was originally designed for, with this resulting from evolution and expansion of the airport. It is important context that the permission to 43mppa was granted in line with the current national aviation policy objective of 'making best use' of the UK's aviation assets.

Infrastructure buildings need to be able to adapt to changing needs. It is a fundamental principle that Foster and Partners deliberately designed the terminal building in a modular way with repeatable elements, so that it could be expanded as the airport evolved, whilst still maintaining the same architectural language. The expansions of the terminal in the early 2000s are a prime example of this, and the current proposal adopts the same principles of modular bay expansion.

In response to changing needs, the terminal building has already undergone several phases of change including the aforementioned extensions and internal configuration. From when Foster and Partners design was first conceived, the internal arrangement at its opening was different and the 'simple flows' envisaged were never fully realised.

'The vision and future aims for the airport were set in the Stansted Airport Sustainable Development Plan 2015 (SPD); this document was set to be revised at least every 5 years. The document considered the TTS as a vital infrastructure to the efficient running of the terminal. The need for replacement or complete refurbishment of the vehicles in the medium term was acknowledged (land use document, page 35). A review in conjunction with both passenger user groups and airline partners was envisaged in order to establish its long term future. It is unclear whether this has taken place.'

The importance of the TTS to the efficient running of the terminal was indeed highlighted by the applicant in its SDP, eight years ago. The period since then has allowed further analysis (summarised in the Heritage Statement) with this concluding that the TTS can no longer meet the airport's needs (both passenger and airline) and in particular when taking into account the expansion of passenger capacity granted in 2021. Accordingly, an alternative means to efficiently transport passengers is required to enhance the operation of the building as currently operating and as it evolves, and to ensure the preservation of the 'vision' of Foster and Partners.

'The proposals would remove elements that were integral to the idea of how the terminal and satellites operated and were experienced. There will also be a considerable change on the appearance of the terminal building on the airfield side; this would have the effect of unbalancing the transversal section of the building, with open canopies on either side. These interventions would have a strong impact on the architectural significance of this building, which we consider has great potential to be of national significance.'

The Heritage Statement (page 43) sets out the reasons why the TTS is capacity constrained and inefficient in processing the approved passenger capacity. The consequential closure of the TTS and use of the area to support additional terminal space are the next step in the evolution of the airport, much as there has already been several evolutionally steps since it was originally built to address changing needs such as: increased passenger numbers; changing security and immigration requirements; and passenger expectations.

At previous stages of change, extensions to the east and west were the optimal solutions. At the current stage of change, further side extensions do not meet the airport's operational needs whereas a northern one does for the reasons set out in the Planning Statement (paras 2.10-2.18).

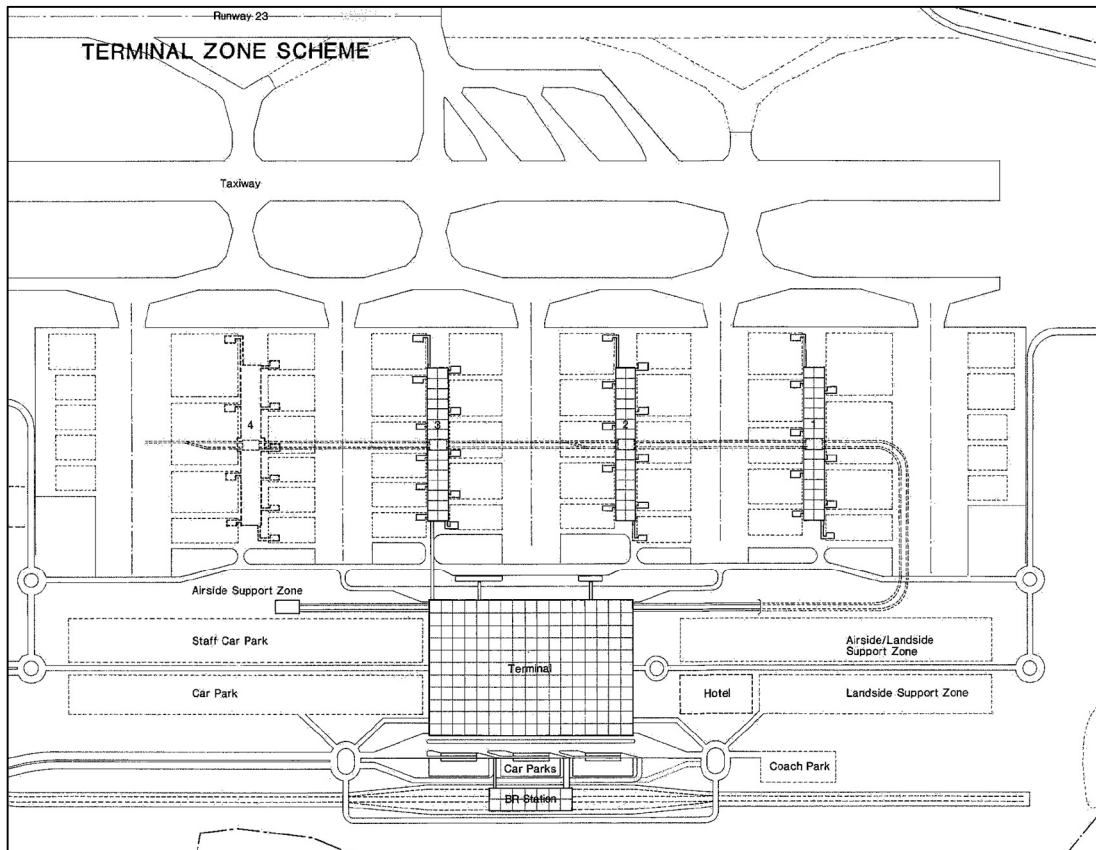
With regard to changes to the character of the airfield side elevation, and the experience of it, the Heritage Statement highlighted that a build of the extant permission for the Arrivals Building to the east of the terminal would result in the transversal section to the east not being visible, as can be seen in the image below. HE did not object to the Arrivals Building planning application.



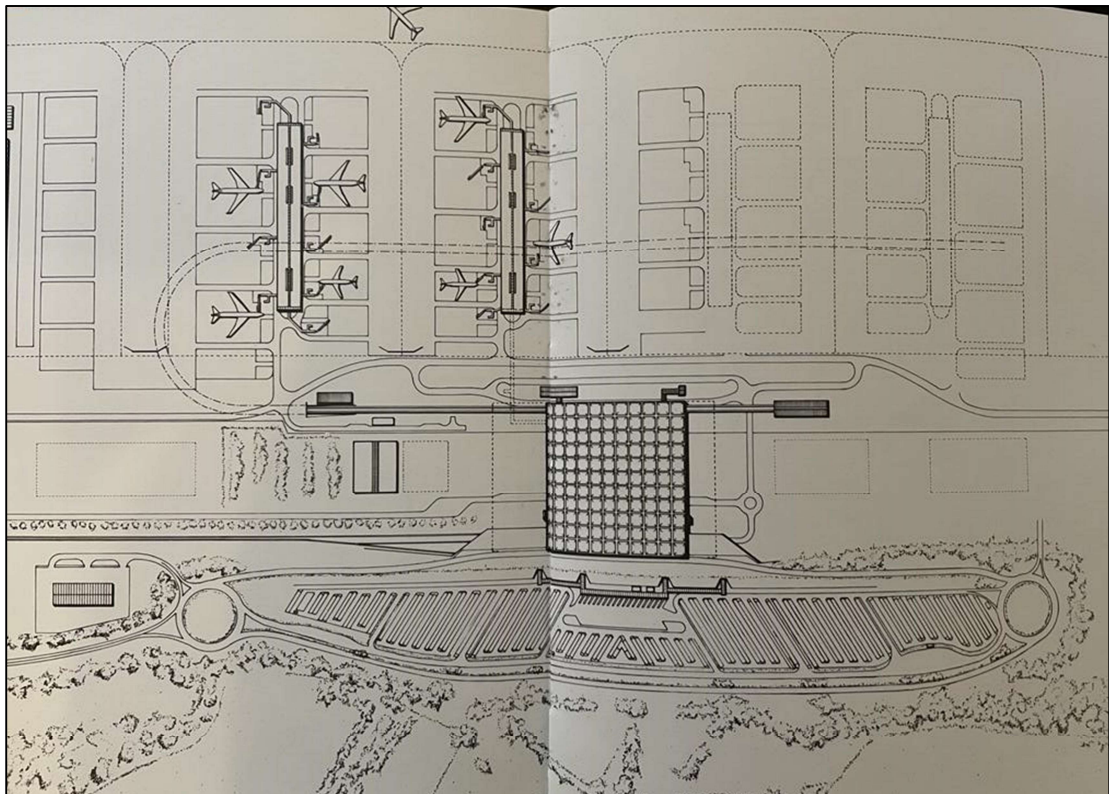
'In terms of movement and relationship of the terminal with its satellites, the current proposals do not take into account the original concepts in which the airport was designed, neither have explored whether its principles could be followed.

For example, the TTS is considered a pinch point on the flow of passengers through the airport. This could be partly because the maximum efficiency of the system would have been achieved when the four satellites were completed, as the infrastructure would operate on a full loop. However, when the third satellite was implemented, this was not connected to the TTS, but to a separate airlink. It would seem reasonable to assume that the full track was laid out at the outset, with the stations subsequently developed in parallel to the construction of the satellites. As an options appraisal has not been included, it is unclear whether the option of reinstating/completing the full loop has been explored."

Firstly, as demonstrated by the plans below, a full loop of the TTS was never intended by Foster & Partners. Accordingly, the assumptions and suggestions made by HE are based upon a misunderstanding of the original design.



Source: 1985 archive Foster Associates material (Note that the final design that was built out reversed the direction of the TTS and the position of satellites 1-3 and the proposed 4 as can be seen in the subsequent image)



Source: Powell, K (1992) *Stansted: Norman Foster and the architecture of flight*

In contrast to Foster & Partners' principle of 'seamless' flow through the airport, the TTS in its current working capacity (resulting from the evolution and expansion of the airport) currently results in a wait for arriving passengers to board the TTS (often having to wait for several minutes for a carriage with spare capacity to arrive), a cramped experience on the TTS itself and then queuing with multiple other passengers once a whole carriage disembarks at immigration. Passenger growth at Satellites 1 and 2 has already exacerbated each stage of this waiting/queuing, quite the opposite of Foster & Partners' concept of seamless flow.

Opening a TTS station at Satellite 3, or at Satellite 4 if it was built in the future, would only magnify the capacity problems that the current TTS serving Satellites 1 and 2 cause. It would result in even greater numbers of passengers being deposited at immigration in groups, compounding the problem that is already caused by this means of transfer.

In contrast, an uninterrupted passenger flow from the aircraft, through a satellite and then through a skylink walkway before immigration (as is proposed under this application) would naturally spread out passengers and allow immigration processing of passengers in a more stable manner.

Secondly, there is no track beyond servicing of Satellite 2.

Finally and with specific regard to the original design concepts of the terminal building itself, the Heritage Statement explains how the modular design, repeatable elements and circulation are the main elements of significance. The proposals continue the modular/repeatable elements and also aims to address the circulation issues that the TTS is unable to meet in the coming years to deliver the increased capacity.

Within this context, we contend that HE has given undue prominence to minor elements that make a limited contribution to the significance of the airport and how it currently functions.

'High-Tech buildings' were not constructed to remain stagnant and unchanging, and modern aviation architecture should be understood and treated differently in heritage assessments to a building built for a sole purpose and use which was anticipated to persist largely unchanged. The development proposals maintain the architectural philosophy of the terminal, with no more than minor harm to significance that can be balanced against passenger experience benefits resulting from improvements to the operation of the airport and the wider economic benefits that will arise from accommodating the consented increased passenger capacity.

'The current TTS is considered unfeasible, the changes in airport environment being cited as one of the reasons (ARS report, page 43). However, it is worth noting that a good number of the most recent, largest international airports incorporate similar automated people mover systems in their designs. The system is therefore apt to serve modern requirements, the issue being the cost of upgrade and maintenance, particularly when compared to the cost of constructing and serving the walkways.'

The replacement of the TTS with long skylinks is argued to improve passenger experience. However, the use of skylinks would not appear to deliver a more efficient management of passenger flow, but simply to spread it out over a longer distance. The argument of an improved passenger experience is therefore challenged.'

With respect to HE, the applicant's knowledge and understanding of passenger flows, behaviour and expectations is far greater than those of HE and is the basis upon which the scheme has been designed.

The assertion made by HE that the TTS is 'apt to serve modern requirements', with only cost being a constraint, is unsubstantiated and not supported by a detailed understanding of the operational requirements of the airport or associated costs of upgrading and running the TTS.

HE provides no directly comparable examples of 'automated people mover systems' that have a similar age, purpose or future capacity requirement as the TTS at Stansted.

Furthermore, the use of passenger walkways is an extremely common feature of airport design worldwide. The airport would not be committing to spend tens of millions of pounds on new structures and travelators within them if it considered that the continued use of the TTS was the optimal way to make the airport function efficiently and to accommodate future approved increases in passenger numbers.

'Paragraph 189 explains that heritage assets are an irreplaceable resource and should be conserved in a manner appropriate to their significance, so that they can be enjoyed for their contribution to the quality of life of existing and future generations'

Whilst recognising the wording of Paragraph 189, we highlight that it does not preclude change to heritage assets. Specifically, it serves as an introduction to Section 16 of the NPPF and any change (and thus harm) that may arise to a heritage asset should be considered within the context of policy.

'Paragraph 192. In determining applications, local planning authorities should take account of a) the desirability of sustaining and enhancing the significance of heritage assets, b) the positive contribution that conservation of heritage assets can make to sustainable communities and c) the desirability of new development making a positive contribution to character and distinctiveness.'

Based upon the summary of Paragraph 192 provided by HE, it is considered that they mean to refer to Paragraph 197 instead.

Whilst noting the wording of Paragraph 197, as with Paragraph 189, this forms one part of the approach set out in the NPPF's Section 16 and does not preclude change to heritage assets.

'Paragraph 194. In determining applications, local planning authorities should require an applicant to describe the significance of any heritage assets affected, included any contribution made by their setting. The level of detail should be proportionate to the asset's importance and no more than is sufficient to understand the potential impact of the proposal on their significance.'

The submitted Heritage Statement provides a proportionate description of significance, meeting this requirement of the Framework. Whilst HE does not agree with the conclusions of the Heritage Statement, it does not state that it is deficient in its assessment. Accordingly, we consider that the requirements of Paragraph 194 have been met.

'Paragraph 197. The effect of an application on the significance of a non-designated heritage asset should be taken into account in determining the application. In weighing applications that directly or indirectly affect non-designated heritage assets, a balanced judgement will be required having regard to the scale of any harm or loss and the significance of the asset.'

Based upon the summary of Paragraph 197 provided by HE here, it is considered that it means to refer to Paragraph 203.

High Court Judgements have confirmed that when considering potential impacts on non-designated heritage assets within the decision-making process, the balanced judgement required is different from the public benefits exercise associated with designated heritage assets (as set out in Paragraphs 201 and 202 of the NPPF).<sup>2</sup> Within a High Court Judgment of 2017, Jarman HHJ confirmed that the only requirement of the

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<sup>2</sup> DLUHC, NPPF, paras. 201 and 202.

NPPF in respect of non-designated heritage assets is that the effect of an application on the significance of a building should be taken into account, *"nothing more, and nothing less"*.<sup>3</sup>

'In turn paragraphs 199 and 200 ask to give great weight to the conservation of heritage assets, irrespective of the level of harm, with any harm to have clear and convincing justification.'

Paragraphs 199 and 200 both concern 'designated heritage assets' and so are not applicable to the consideration of the scheme as the terminal building is not Listed.

'The need for the upgrade of the infrastructure is not disputed. However, we remain concerned about the impact the proposed interventions would have on the architectural significance of this iconic landmark of airport planning design. It is also unclear whether the proposed interventions would be enough to appropriately manage the substantial increase in passenger numbers granted. For an infrastructure of this relevance, we would expect to see a more thorough options appraisal of the options considered and how these fit with the vision for the airport and previous granted proposals.'

As stated in the application (Planning Statement paragraph 7.56) the proposals would enable the terminal to accommodate consented passenger numbers up to 43 mppa. HE provides no evidence to substantiate their view that the proposals will not.

As the terminal building is not Listed, there is no requirement in planning policy for applicants to prepare an options appraisal of the different ways to physically accommodate planned development. Notwithstanding, paragraphs 2.10 to 2.18 of the submitted Planning Statement set out an explanation of the options considered to accommodate future capacity that resulted in the current proposals being submitted.

'Ultimately, there stands the question of what is the maximum capacity the terminal can carry without losing the attributes that merited its recognition as a landmark referent on airport planning design, not only in terms of its innovative architectural design, but also in terms of its functionality, efficiency and use of cutting edge technology.'

The terminal has no 'maximum' capacity – the very design ethos of Foster & Partners was that the terminal building was expandable and adaptable to meet future needs.

The Heritage Statement demonstrates that the modular design, repeatable and effective materials, and originally proposed circulation were the main significant features. These elements allow for expansion. HE has placed much greater emphasis on the TTS and rear canopy, which we recognise have some significance but are not central to the overall philosophy.

The loss of the TTS would change circulation as it was originally conceived, but this is an element of the passenger journey that has become inefficient due to passenger growth over subsequent years and quite the opposite of what Foster and Partners envisaged.

'Finally, we also draw your attention to the comments submitted by the C20 Society and their intention to submit a listing screening. Consequently, we would recommend that determination of the application is halted until this assessment is carried out, its significance assessed, so that appropriate weight can be given to the impact on the architectural values of the building.'

Firstly, at that date of writing (5<sup>th</sup> October 2023) we have not been notified that an application for listing has been submitted to HE by the TCS or any other party.

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<sup>3</sup> Travis Perkins (Properties) Limited v Westminster City Council [2017] EWHC 2738 (Admin), Paragraph 46.



Secondly, even if a listing application had been submitted this does not result in:

- The use of a different NPPF policy context (i.e. use of paragraphs 199-202 for designated heritage assets).
- The introduction of a statutory requirement for the planning application to be held in abeyance whilst HE considers the building.

Accordingly, we instead consider the correct approach is to determine the application within the timescale originally set out by the Planning Inspectorate, with the terminal building considered as a non-designated heritage asset in NPPF policy terms.

**‘Historic England has concerns regarding the application on heritage grounds’**

We note that HE only state concerns and that these cumulatively do not conclude in a formal objection.

**‘In determining this application you should bear in mind the statutory duty of section 66(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990 to have special regard to the desirability of preserving listed buildings or their setting or any features of special architectural or historic interest which they possess.’**

The building is not a Listed Building and thus the statutory duty set out at Section 66(1) of the Act does not apply.

## Response to The Twentieth Century Society comments dated 21 September 2023

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'The Twentieth Century Society have been alerted to this application and offer the following comments. The Society objects to this application to alter an internationally significant building, which the Society believes, merits listing at a high grade. The case was presented to the Society's expert Casework Committee and the members agreed not only that this application causes harm to the terminal building, but that the Society should prepare an application requesting that the building be added to the National Heritage List.'

As set out above, at the date of writing (5<sup>th</sup> October 2023) we have not been notified that an application for listing has been submitted to HE by the TCS or any other party.

'We therefore consider this building should be identified as a non-designated heritage asset on account of its clear national architectural significance and considered in these terms for this application.'

We do not dispute that the terminal building should be classified as a non-designated heritage asset; however, the relative significance of the components parts of the building should be taken into account. The TTS and rear canopy, whilst of some significance, are not central to the overall philosophy and 'vision' of the terminal building.

'As a result, the relevant clauses of the National Planning Policy Framework (NPPF) should be taken into account by PINS when determining the outcome of the application. Paragraph 189 of the NPPF describes 'heritage assets', as 'an irreplaceable resource [...] [which] should be conserved in a manner appropriate to their significance, so that they can be enjoyed for their contribution to the quality of life of existing and future generations'. Paragraph 197 states that 'in determining applications, local planning authorities should take account of: a) the desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation; b) the positive contribution that the conservation of heritage assets can make to sustainable communities including their economic vitality; and c) the desirability of new development making a positive contribution to local character and distinctiveness'.

See our commentary on Paragraphs 189 and 197 within the HE section above.

'Paragraph 203 of the NPPF relates to NDHAs and asks that 'The effect of an application on the significance of a non-designated heritage asset should be taken into account in determining the application. In weighing applications that affect directly or indirectly non designated heritage assets, a balanced judgement will be required having regard to the scale of any harm or loss and the significance of the heritage asset.' In addition the exhortation that 'great weight should be given to the asset's conservation' (para. 199) should be heeded as should paragraph 200: 'Any harm to, or loss of, the significance of a designated heritage asset (from its alteration or destruction, or from development within its setting), should require clear and convincing justification.'

See our commentary on Paragraph 203 in the HE section above.

To confirm what we state above, Paragraphs 199 and 200 of the NPPF concern designated heritage assets and thus are not relevant to the current application.

'Stansted Airport Terminal (1981-1991) is of very high architectural significance not only by virtue of its connection with the international acclaimed practice of Foster & Partners, but also because it pioneered a new approach using high-tech architecture to 'challenge the rules of terminal design'. That the terminal was an outstanding contribution to airport design was recognized at the time of construction, and it was garlanded as a multi-award winning project, claiming the European Union Prize for Contemporary Architecture Award in 1990 and 21 other awards subsequently, including the RIBA Architecture Award 1992;

Civic Trust Award 1992 and the Aluminium Imagination Architectural Award 1991. The press was also enthusiastic, and the Terminal was written up in all major national and international architectural and engineering journals. A typical commentary was that in the *Architectural Review* which concluded that it was 'highly sophisticated constructionally'. Stansted Airport Terminal is internationally pioneering and has set a precedent for several terminal buildings since. The concepts which originated at Stansted would be further developed in subsequent airports designed by the firm, such as the Hong Kong Chek Lap Kok International Airport (1997) and Beijing Capital International Airport (2008), two of the world's current largest and most advanced airports, as well as influencing other airport planners worldwide.'

We acknowledge that the terminal has influenced the design of other airports. However, we consider that the changes proposed to the terminal would not substantially harm the elements of significance for which it is renowned when taking into account the relative significance of the areas that would be subject to change.

'The significance of this building, outwith its prize-winning status and its influence on high-tech and international air terminal design, is its structural simplicity which belies its sophisticated concept. The principal building was conceived as a large rectangular ground plan divided in two longitudinal strips: a landing-reception area and a runway-embarkation area. Public access and airfield side are signified by open canopies running continuously along the elevations; the front for general access, the rear, for the Terminal Transit System. The structural 'trees' which root the building to its 18metre square grid are elegant forms but serve the dual purpose as the service distribution system which runs through the 'trunks' both externally under the canopies and rise from the undercroft through the concourse floor. Most strikingly, the trees supported the roof canopy that floats over the entire terminal building letting in the maximum amount of light. Being daylighted in this way gives the concourse significant energy and economic advantages, and Fosters claimed at its completion this led to running costs that were 'half those of any other British terminal' Foster's interior design was based on ease of use, so that passengers progressed in a 'fluid movement' through the different airport functions until they reached air-side, where they could see the planes. From there, an automated Tracked Transit System took them to the aircraft located by the satellite buildings. This degree of clarity was achieved by turning the building 'upside down', banishing the heavy environmental services usually found at roof level to an undercroft that runs beneath the concourse, with the baggage handling.'

The majority of the physical elements cited above will remain unaffected by the proposals (the single concourse, the roof, the structural trees, use of daylight). As the Heritage Statement sets out, Foster & Partners' principle of fluid movement was never fully realised and does not currently exist.

'It is acknowledged that the terminal has been altered since construction. The main changes have been to the interior flow of the passenger route with a more tortuous route being introduced which interrupts the clarity of the original circulation as designed. However, such changes are theoretically reversible and the interiors of airport terminals will always be adapting to changing commercial and security pressures. It was always foreseen that Stansted may expand and the introduction of new terminals have affected this original building with the construction of a walkway to the third. It was also intended that the terminal building itself would be capable of extension, its modular nature allowing for ease of addition allowing for expansion to the sides without detracting from its symmetrical form and maintaining the external expression of the structural tree columns in the canopies.'

The recognition that the terminal has been altered and anticipated to further expand is welcomed.

'The proposals currently under consideration in this application, however, do not take the original principles for extension into account. The proposed extension by two bays on the airside elevation will be detrimental to this heritage asset, involving the enclosure of the balancing external canopy and the removal of the Terminal Transport System. The effect of these alterations will be to unbalance the architectural conception of the terminal losing the external expression of the structural trees under the canopy on one elevation is unnecessary and hugely detrimental to the appearance of the building.'

We dispute the TCS's position on this and consider they have over-emphasised the architectural principles and underplayed the functional considerations of the terminal building. The modular nature of the building means that it could be extended in any direction, not solely to the east and west. The view of the rear canopy is already severely interrupted, and an extant permission exists for an adjacent Arrivals Building too which further interrupts such views. While there is a symmetry to the existing building, this in our view makes a lesser contribution to significance, compared with its other functional and architectural elements and its philosophy which are core to its significance.

'The loss of the TTS will destroy a significant element of the original circulation. The Society objects strongly to these elements of the application, not the least because the terminal has the capability of extension without the need to destroy major architectural concepts of the original design. The principle of extension is not disputed therefore, but the execution of it in these proposals, which the Society considers causes harm to the significance of the building and insufficiently justified.'

Whilst we acknowledge that there is some minor contribution of significance from the TTS to the original ideas of circulation, this should be considered as limited due to the function of the building as an airport and its wider philosophy. The terminal's modular nature anticipated its capacity for change and this should be welcomed to allow it to adapt to meet current and future operational and passenger needs. Furthermore, the commentary made by the TCS regarding capacity for the building to be adapted in other ways is not based upon an understanding of the operational requirements and restrictions of the airport.