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Second Sea Lord & Deputy Chief of Naval Staff Vice Admiral
Jonathan Woodcock OBE
Portsmouth Naval Base Commander Cdre Jeremy Rigby
Portsmouth City Council Planning Department

17 February 2017

Remedial action for Portsmouth Dockyard Buildings at Risk

Dear Vice Admiral Woodcock, Cdre Rigby and Portsmouth City Council Planning Department

The Naval Dockyards Society (NDS) is writing to the Ministry of Defence (via you), and Portsmouth City Council Planning Department to call for remedial action to conserve and re-use specific Buildings at Risk (A) within Portsmouth Naval Base through a sequential series of requests set out below (B). Its case is justified from government documentation (C and D References), will be taken forward within a broad base of support and publicised to raise public awareness and gain support for a MoD Conservation Group or a Heritage Partnership Agreement. Freedom of Information Requests will also be submitted to the MoD and Portsmouth City Council Planning Department.

It is not acceptable for the MoD to state that 'austerity measures will continue to provide challenges for MOD heritage management. The effects are already being experienced with a decline in the condition of listed buildings and the scaling back of condition assessments as a result of budgetary constraints.' (*MOD Heritage Report 2011-2013, 2014*, para. 41) With Crown immunity removed, the MoD must comply with planning statutes. Doing nothing is no longer an option.

The crucial route is for new and appropriate uses to be found for these buildings, so that operational budgets also finance conservation. This is the best way to secure their conservation and future. With the disposal of HMS Nelson wardroom announced by Defence Minister Mark Lancaster in 2016 (Ministry of Defence, 18 January 2016), the former Royal Naval Academy and The Parade are logical replacements, their refurbishment meeting naval ethos, conservation and operational requirements.

A. Named naval base buildings and structures

These are within Conservation Area No 22 (H.M. Naval Base & St Georges Square Portsmouth, <https://www.portsmouth.gov.uk/ext/documents-external/dev-cons-area-22-map-hmnavalbase-and-stgeorgessq.pdf>) and listed in the Historic England *Heritage at Risk Register South East*, 2016, pp. 67-68 (<https://content.historicengland.org.uk/images-books/publications/har-2016-registers/se-har-register2016.pdf/>):

Primary list

1. 2-8, The Parade, HM Naval Base, Portsmouth (Buildings 1/125-131, Grade II*) 'Poor'; 'A: Immediate risk of further rapid deterioration or loss of fabric; no

- solution agreed'; 'Partially converted to office use c1995, but now empty. Prone to wet rot and some structural movement. A repairs schedule promised by May 2009 has not been circulated. Background heating has been introduced, reducing damp levels. However, problems persist with detailing between the main building and the rear extensions.'
2. Former Royal Naval Academy, College Road (Buildings 1/14 and 1/116-9, Grade II*) 'Poor'; 'A: Immediate risk of further rapid deterioration or loss of fabric; no solution agreed'; Natural ventilation has been introduced, reducing damp levels. Background heating was installed during winter months, however there are still signs of water ingress. There is still some dry rot within the building.'
 3. Iron and Brass Foundry, Victoria Road, HM Naval Base, The east wing (Gunnery Gear Store and Pattern Shop, Building 1/136, Grade II*) 'C: Slow decay; no solution agreed'; 'The east wing (Building 1/136) remains unused and at risk. There are concerns over water ingress.'
 4. No. 6 Dock, Basin No. 1, Portsmouth Dockyard (SM 397 Grade I) 'Poor'; 'C: Slow decay; no solution agreed.'; 'The dock is suffering from rotation, and mortar joints on the stonework altars on the north side have opened up.'
 5. No. 25 Store, Yard Services Manager's Office, Jago Road, HM Naval Base, Portsmouth (Building 1/118, Grade II*) 'Fair'; C: Slow decay; no solution agreed'; 'In fair condition but vacant. Future use uncertain.'

(A: Immediate risk of further rapid deterioration or loss of fabric; no solution agreed.
C: Slow decay; no solution agreed)

Supplementary List (not on the 2016 Historic England Heritage At Risk Register):

6. Portsmouth Pay Office, College Road (Building 1/11, Grade II) is suffering damage to the brickwork from rain ingress where the bomb-damaged first storey was removed in 1941 and the new brickwork meets old brickwork in the north elevation. (Coats *et al.*, *C20 Dockyards*, 2015, p. 119)
7. Portsmouth Block Mills, Main Road (Building 1/153, SM 395, Grade I) have had no re-use since their comprehensive restoration in 2008, partly because of their location within the operational naval base, but also because the external iron staircases were removed from the southern elevation, thus limiting access to the upper floors. Without daily use and ventilation the fumes from the underground reservoir are building up to an unpleasant, if not unhealthy, level. (Coats *et al.*, *C20 Dockyards*, 2015, pp. 146-8)
8. Remaining railway track which is sparse and scattered, needs surveying and conserving (Coats *et al.*, *C20 Dockyards*, 2015, pp. 171-3)

The current state of these structures is such that their conservation requires both an immediate and a long-term broad-based plan of action. In order for the named structures to be restored to a useful condition, they should receive more of the operational naval base budget, with a higher level of annual maintenance than at present. This target could be managed through a MoD Conservation Group or a Heritage Partnership Agreement.

B. Requests

1. Quadrennial inspection reports on all listed buildings and quinquennial inspection reports for scheduled monuments in the naval estate are designed to prioritise maintenance and repairs. The NDS requests within one month from the date of this letter that the MoD reports on the specific current actions being taken to implement findings on the structures 1-7 above.

2. Based on the outcomes of Request 1, the NDS calls for immediate remedial conservation work to be carried out by the MoD on the named structures to prevent further deterioration.

3. The NDS calls for a Conservation Statement to be drawn up in 2017 by the Ministry of Defence (MoD), the Department for Culture, Media and Sport (DCMS), Historic England (HE), Portsmouth City Council (PCC) Planning Department, and other interested parties to inform Request 4.

4. The NDS calls for an effective Conservation Management Plan to be drawn up by the MoD, DCMS, Historic England, PCC Planning Department and other interested parties by 2018.

5. The NDS calls for a Statement and Guidelines to be created for Conservation Area No 22 H.M. Naval Base & St Georges Square Portsmouth, which contains most of Portsmouth's Grade I Listed Buildings and Scheduled Monuments by Portsmouth City Council Planning Department by 2018.

<https://www.portsmouth.gov.uk/ext/documents-external/dev-cons-area-22-map-hmnavalbase-and-stgeorgessq.pdf>

6. The NDS calls for a MoD Conservation Group or a Heritage Partnership Agreement to be set up by 2018 to oversee these requests.

In conclusion, the NDS calls for a cultural collaboration of stakeholders to set up a MoD Conservation Group or a Heritage Partnership Agreement to resolve reported inconsistencies, deliver sustainable solutions creatively and accomplish what has not been achieved by the MoD in Portsmouth Dockyard in the last ten years.

Yours sincerely

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cc

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DCMS Secretary of State The Rt Hon Karen Bradley MP
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Royal Town Planning Institute South East
Council for British Archaeology
Hampshire Buildings Preservation Trust
Heritage Trust Network
ICOMOS Fortifications and Military Heritage (IcoFort)
Joint Committee of the National Amenity Societies
Portsmouth Naval Base Property Trust
SAVE Britain's Heritage
The Ancient Monuments Society
The Architectural Heritage Fund
The Gardens Trust
The Georgian Group
The Heritage Alliance
The Institute of Historic Building Conservation
The Portsmouth Society
The Prince's Regeneration Trust
The Railway Heritage Designation Advisory Board
The Society for Nautical Research
The Society for the Protection of Ancient Buildings
The UK Association of Preservation Trusts
UK National Committee of ICOMOS
BBC South
Defence Estates Sanctuary Team
Private Eye
Team Locals
The Navy News
The Portsmouth News
The Telegraph

C. Literary justification for Requests 1-6

1. The MoD, as a government department, should be applying government legislation and guidance to maintain its historic buildings to a 'good' standard.

The preamble of the *Protocol* (Historic England, 2009), stated that:

The Government is committed to setting a good example in the care of its historic estate. This Protocol explains how departments and agencies will put this commitment into practice.

The maintenance of heritage assets in active use and good repair is part of a sustainable approach to the environment. A strategic, systematic approach to the management of historic property will help to achieve value for money and safeguard the special interest of the historic environment.

Managing Heritage Assets (Historic England, 2009, p. 2) stated that

The Government is committed to setting an example in the conservation of its historic estate and the maintenance of any historic buildings occupied by government departments, endorsing the importance of preventative maintenance as part of an integrated approach to the historic environment.

Fig 1 (Ibid. p. 4) Corporate management of heritage assets, includes Conservation Management Plans and Asset Management Plans and para. 3.6.1 (Ibid. p. 15) stated that:

Assets should be maintained to meet statutory and legal liabilities. Appropriate standards should be applied to heritage assets. 'The conservation of significant places is founded on appropriate routine management and maintenance' (see Conservation Principles). Maintenance regimes should be set out in the asset's Conservation Management Plan.

Given the grading of these named assets (bar the railways), they should be benchmarked as 'special' and 'Maintained to high standards at all times due to operational necessity, importance or heritage status' (Ibid. Table 4, p. 15). Where their condition is 'poor' (as with the Primary List structures and the Pay Office above), they should be given highest urgency ratings and major impact ratings (Ibid. Tables 6, 7, p. 21).

In preparing the business case for these structures, the report stated (Ibid. p. 24) that 'any impact on heritage value should be included under the relevant sections.' Further:

The cost of repair projects can be set against the increased cost of delaying repairs, but the potential non-financial losses must also be taken into account (such as loss of heritage value). Risk assessment for business cases for repair projects should always include any risk of damage to historic fabric and possible reputational risk as a result of deferring recommended repairs.

The report (Ibid. p. 25) further stated that the government department has a responsibility to 'act as an exemplar in the conservation and management of its historic estate' by 'developing an Asset Management Plan which recognises heritage as well as other values' and 'giving due consideration to heritage values when allocating budgets'. The effect of deferring work, causing 'structural or weathertightness issues' and 'fabric deterioration' (Ibid. p. 30), should be taken into account when deciding priority and urgency. Where buildings are vacant (as with all the structures on the At Risk Register):

vacant buildings are at greater risk of deterioration than occupied ones, where problems are more likely to be addressed before they become critical. Repairs to vacant buildings should be given due importance, and allocating a risk category as Table 9 may aid this. (Ibid. p. 31)

Additionally (Ibid. p. 32), these structures exhibit 'severe' vulnerability due to being in a 'coastal /high rain' area, which is clearly the case with Portsmouth Dockyard.

Leaflet 12: Historic Environment (Ministry of Defence, 2010) declared:

12-2. It is Government policy that all historic assets, for which central Government is directly responsible, meet appropriate standards of care and use. MOD supports the Government's Statement towards the historic environment by continuing to set an example for others in meeting appropriate standards of care and use of its heritage assets.

In particular:

12-41. Listed building legislation states that "reasonable steps" should be "taken for properly preserving a listed building". The listed building legislation contains provisions for local authorities to serve enforcement notices which will impact upon the reputation of MOD. Under Scheduled Monument legislation it is illegal to cause damage to or disturb Scheduled Monuments. Many non-designated sites receive protection under the planning system. Further clarification concerning listed building and scheduled monument legislation can be sought from HET. (Historic Environment Team)

12-42. SETLs [Site Estate Team Leaders] are responsible for the maintenance and repair of heritage assets to an appropriate standard that is consistent to the conservation of the asset. Heritage assets should be integrated into the establishment's asset management process and their management needs should be prioritised and resources to be targeted effectively.

12-46. It should be noted that maintaining and enhancing heritage assets should be based on an understanding of their nature, extent and level of significance. The more significant the asset, the greater the presumption in favour of its protection.

12-49. Unused assets including vacant historic buildings should be regularly inspected and maintained in a secure, safe and stable condition. Assets should be kept wind and weather tight as a minimum standard. The SETL must be able to demonstrate that any unused assets are being actively managed (maintenance and inspection regime) to ensure they are not put on any HAR register.

MoD Leaflet 12 (2010) asserted:

12-52. The MOD is committed to resolving its HAR issues and ensuring assets do not become at risk. The MOD HAR Officer's role is to work with internal and external stakeholders to establish risks and develop a plan for the sustainable future of each MOD HAR asset. Performance on HAR is reported in the MOD Stewardship Report, Heritage Report and Sustainable Development Report. It is also a MOD Sustainable Development Key Performance Indicator.

Optimism was expressed in the *MoD Heritage Report 2009-2011* (Ministry of Defence, 2012) which claimed (para. 2) that "The MOD continues to be an exemplar within

Government regarding the management of its historic estate.’ However, para. 7 declared:

MOD heritage management will face a number of challenges in the coming years. Reduced budgets will drive prioritisation of funding towards operational outputs. The effects are already being felt. Budgetary restrictions during the reporting period have confined any maintenance work to statutory compliance on some areas of the estate. It is expected this situation is likely to continue and may impact on the condition of the historic estate in future.

‘[S]tatutory compliance’ is *not* being met, and these *Heritage Report* statements do not apply to the named buildings above:

9. Despite these challenges, heritage management on the MOD estate is now robust. Awareness of the importance of heritage and its management requirements is high, including reflection within strategic planning. This has helped MOD to identify the potential risks to heritage management and ensure they are actively managed through this period of change.

38. Heritage is considered within the hierarchy of MOD governance structures from a high level including the Defence Environment and Safety Board, to the Historic Estate Working Group at a policy level and down to establishment level e.g. Portsmouth and Plymouth Heritage Working Groups, Otterburn Heritage and conservation groups.

39. The Services have their own heritage committees chaired at a senior level, which consider heritage estate within their remit.

Furthermore, the *MOD Heritage Report 2011–2013 (2014)* reported that

7. MOD heritage management will face a number of challenges in the coming years. Austerity measures will mean reduced infrastructure budgets and further prioritisation of funding to support operational outputs. The effects are already being felt as budgetary restrictions during the reporting period have confined maintenance work to statutory compliance in some areas of the estate, under Programme PROMPTU.

Para 28 included the Former Royal Naval Academy, Portsmouth as a new HAR entry for the MoD. It concluded

41. The austerity measures will continue to provide challenges for MOD heritage management. The effects are already being experienced with a decline in the condition of listed buildings and the scaling back of condition assessments as a result of budgetary constraints.

C20 Dockyards (Coats *et al.*, 2015, p. 71) noted that ‘The MoD announced in 2009 (Defence Estates, p. 11) that it has formally adopted the DCMS protocol for the care of the government historic estate (English Heritage/Historic England, 2009, *Protocol*) and was committed to the following actions:

- MOD undertake condition assessments on a four yearly basis (quadrennial) for listed buildings and a five yearly basis (quinquennial) for scheduled monuments
- MOD has in place a range of management plans including Integrated Rural Estate Management Plans, site specific Environmental Management Systems and Integrated Estate Management Plans. Conservation Management Plans and

Conservation Statements are produced for sites of high heritage value where a need is identified

- Heritage assets are identified within the site's Integrated Estate Management Plan and are accompanied by a maintenance programme
- The MOD BAR Officer is in post, working to establish agreed costed plans to resolving each BAR
- MOD applies DCMS guidelines to inform the disposal process.

This *Protocol* has clearly not been followed. Nevertheless, Defence Infrastructure Organisation estate and sustainable development (Ministry of Defence, 2012–2017) continues to assert: 'DIO is committed to being an exemplar of best practice and raising the quality of life for estate users through high standards in design, construction and ongoing maintenance.' Including 'historic dockyards', it defines MOD heritage and ethos sites as:

"a location, facility, building or structure in, on, over, under or from which a commendable event or events of significance in the history of the services or defence, and pertaining to its ethos, occurred or to which it is directly associated"

Under 'Managing MOD's historic buildings', it alludes to the 'renovation of the Block Mills in Portsmouth Naval Base' as 'an excellent example.' Unfortunately, the Block Mills are an example of a restored building without an identified re-use or occupancy, which means that its condition will deteriorate once more.

The MoD has clearly not followed government regulations and guidelines, as the List A primary properties are on the HAR, most of them since before 2008.

2. Neglected maintenance has allowed the condition of the named structures to deteriorate so the eventual remedial costs will escalate.

While the *Protocol* (Historic England, 2009) stated that the Crown must prepare biennial conservation reports on work and issues (para. 10), the *Biennial Conservation Report – the Government's Historic Estate 2011–2013* (Historic England, 2013) reported (p. 5) that some government departments 'have programmes which have fallen behind schedule and are far from being comprehensive (Ministry of Defence and Ministry of Justice).' Furthermore (p. 6), 'the Defence Infrastructure Organisation have fallen significantly behind with their programmes of quadrennial condition surveys on listed buildings.' Moreover, English Heritage had fewer resources in regard to the Ministry of Defence 'for carrying out on-site inspections of heritage assets at risk. The information available on their condition is neither fully up to date nor comprehensive.' Even worse (p. 7): Defence Infrastructure Organisation no longer has a Buildings at Risk officer. As a result, some long-standing cases, including buildings in the operational dockyards at Portsmouth and Devonport, have not been inspected, or have been relatively neglected during the reporting period.'

Pillars of the community (Rolph *et al.*, 2015, p. 5) urged local authorities to make better use of public assets. It noted (p. 8) that "The longer buildings are left vacant, the more expensive it is to bring them back into use. It is vital to take prompt action with unused heritage assets, as the cost of repairs can easily escalate when neglect takes hold.'

The Defence Infrastructure Organisation *Estate and Sustainable Development* (Ministry of Defence, 2012–2017) reports that for the structures apart from the Former Royal Naval Academy on the Primary list: 'No progress during reporting period' (p. 31). Its

Annex: Heritage Assets at risk (p. 68) reported: that Former Royal Naval Academy and 2-8 The Parade are classified as Cat A, and the Iron and Brass Foundry, No. 25 Store and Number 6 Dock classified as Cat C. Its Annex B Heritage at risk on MOD Estate in England (p. 22) lists:

Former Royal Naval Academy, Gd II* listed, Category A, HM Naval Base Portsmouth, Hampshire
 2-8 The Parade, Gd II* listed, Category A, HM Naval Base Portsmouth, Hampshire
 Iron and Brass Foundry, Gd II* listed, Category C, HM Naval Base Portsmouth, Hampshire
 No.25 Store, Gd II* listed, Category C, HM Naval Base Portsmouth, Hampshire
 Number 6 Dock, scheduled monument and Gd I listed, Category C, HM Naval Base Portsmouth, Hampshire

The particular decline of 2-8, The Parade and the Former Royal Naval Academy on the Heritage At Risk Registers 2008–2016

2-8, The Parade	2008	'Part of terrace of dockyard officers' lodgings, 1715-19, with attached service buildings and walled gardens. Converted to office use circa 1990, ceased this use in 1995. Prone to wet rot and some structural movement. Future use uncertain. Nos 1– 9 (adjacent) are in use.'
	2009	CONDITION: Fair OCCUPANCY: Part occupied PRIORITY: C (C) (p. 72)
	2010	'A repairs schedule promised by May 2009 has not been circulated, so the risk category has been raised from C to A.' (p. 69)
	2011	The Parade: now PRIORITY: A (A) 'An options report is said to have been drawn up. A repairs schedule promised by May 2009 has not been circulated.' (p. 73)
	2012	'A repairs schedule promised by May 2009 has not been circulated. Background heating has been introduced, reducing damp levels. However, problems persist with detailing between the main building and the rear extensions.' (p. 78)
	2013	'A repairs schedule promised by May 2009 has not been circulated. Background heating has been introduced, reducing damp levels. However, problems persist with detailing between the main building and the rear extensions.' (p. 71)
	2014	2013 text repeated (p. 76)
	2015	2013/2014 text repeated (p. 71)
	2016	2013/2014/2015 text repeated (p. 67)
Former Royal Naval Academy	2011	CONDITION: Poor OCCUPANCY: Vacant PRIORITY: A (New entry) 'One of the oldest structures in the Dockyard, this building is a Georgian forerunner of the Britannia Royal Naval College at Dartmouth. There are problems with water ingress in the right-hand wing.' (2011, p. 74)
	2012	CONDITION: Poor OCCUPANCY: Vacant PRIORITY: A (A) 'Natural ventilation has been introduced, reducing damp levels. Background heating was installed during winter months, however there are still signs of water ingress. (p. 78)

	2013	2012 text repeated (p. 71)
	2014	2012/2013 text repeated (p. 76)
	2015	2012/2013/2014 text repeated (p. 71)
	2016	'Natural ventilation has been introduced, reducing damp levels. Background heating was installed during winter months, however there are still signs of water ingress. There is still some dry rot within the building. (p. 67)

If government guidelines had been followed, these structures would not be on the At Risk Register, and the ultimate remedial cost would be less. Criteria for measuring the effect of deferring work were listed in Elson and Holborrow, 2009. *Managing Heritage Assets* (p. 30):

Table 8: Example of category identification	Significance of area affected
Effect of deferring work (more than one may apply)	Heritage asset / non-heritage asset
	Primary space / secondary space
Health and safety issues	
Structural or weathertightness issues	
Fabric deterioration (causing loss of heritage or cost value)	
Affects operational use or revenue	
Aesthetic or presentational effect	

3. Setting up a MoD Conservation Group or a Heritage Partnership Agreement

Leaflet 11: Historic Environment MOD conservation groups (Ministry of Defence, 2010) argued the benefits and functions of MoD Conservation Groups:

11-3. MOD conservation groups were formed to implement a recommendation of the Report of the Defence Lands Committee 1971-73 (The Nugent Report) that: "In the field of conservation...We recommend that, where they do not already exist, liaison arrangements should be made between Service units and the civilian community to provide a forum in which matters of local concern can be aired and discussed...A regular exchange of views at the local level will make for a better mutual understanding."

11-4. The function of a MOD conservation group is to further the aims of the natural and historic environment strategy and policy for the MOD estate and support the Head of Establishment (HoE) / Commanding Officer (CO) and Defence Estates (DE) Land Management Services Estates Surveyor (LMS ES) for the relevant site. An overview of natural and historic environment policy can be found in JSP362 Volume 3 Chapter 3 Leaflets 7 and 12 respectively. A conservation group may also consider other sustainable development themes (e.g. local community impacts) as appropriate to the site requirements and interests within the group.

11-5. Conservation groups are a valuable asset to the MOD in monitoring, maintaining and enhancing heritage and biodiversity assets and providing continuity with a breadth of expert local knowledge. These groups can also help to form vital links with the Statutory Bodies (SB) and Non-Governmental Organisations (NGO), attracting joint funding opportunities and additional expert advice.

11-16. A conservation group or focal point is mandatory wherever there is a nationally or internationally designated site on MOD land. Where there is a site with a significant biodiversity interest⁵, a MOD conservation group should be established. On other sites, where there is a presence of some Biodiversity Action Plan (BAP) habitats and/or species (priority or not), the establishment of a MOD conservation group is voluntary and down to site resources. Support⁶ to conservation groups will be prioritised in favour of those sites that have statutory designations. Non-designated sites will be supported as and when resources are available.

Fn. 6 Support to conservation groups by DE Ops EAS will be prioritised to those sites with the highest designations and are therefore subject to Statutory Body scrutiny. Where flexibility exists within any programme of work, support to other sites will be provided on a case by case basis.

11-17. Conservation group membership is open to all civilian and military personnel and their families, to employees of SB, NGO and Non-Departmental Public Bodies (NDPB) and members of the public with an interest in the natural and historic environment on the MOD estate. Conservation group members will be required to comply with all site security and safety regulations. Participation in practical conservation tasks on the Defence Training Estate (DTE) can only be undertaken by persons over 18 years of age.

11-19. A Chairman's Information Pack is available from DE Prop – Sus Dev that provides guidance to the MOD conservation group chairman about their responsibilities. It includes details on the composition and membership of conservation groups, the method of operation, contacts etc.

11-20. The primary function of a conservation group is to provide a forum to discuss the natural and historic environment resource on a site, so that any issues, changes, trends or management requirements can be highlighted to the SET and MOD Environmental Advisors.

11-21. The SET and MOD Environmental Advisors may use conservation groups as a stakeholder consultation forum to provide information and gather comments on proposed change to site estate management and military or other activities. Such consultation should aim to complement any formal consultations required under conservation or planning legislation. There will be circumstances where time or security constraints prevent consultation via conservation groups.

11-24. Conservation groups may undertake surveys, monitoring and practical tasks and activities (provided risk assessment, health & safety and insurance requirements are in place). These should be prioritised and targeted to assist MOD sites in meeting the objectives set within the site management plan⁷. DE Ops EAS staff will provide guidance to all conservation group chairmen to ensure wider MOD and Government targets are included within their planning. Refer to the Chairman's Information Pack for further details regarding the tasks that conservation groups should address.

11-30. Conservation group projects should be planned in advance and included with all other estate management projects in the appropriate site management plan. These will then be included within the appropriate site management funding process applicable to the TLB, Agency or Contract. Funding prioritisation should be appropriate to deliver the needs of the site and the Government targets.

11-33. To carry out their work, conservation group members may request access to areas of MOD land not normally open to the public. Due consideration must be given to the restrictions imposed by JSP 482 - MOD Explosives Regulations.

MOD Leaflet 12 (2010) stated:

12-53. Ideally each historic asset should have a suitable use, but for redundant assets a sufficiently funded maintenance and inspection regime should be adequate to ensure they do not become at risk.

12-88. Heritage Partnership Agreements (HPA) are agreements between the landowner, the LPA and English Heritage about the management of a heritage asset. Currently these agreements are non-statutory. However, subject to legislation, they could be used to streamline consents for a pre-agreed range of heritage asset works. HPAs could be applicable to MOD sites with multiple heritage assets. The HET can advise on the potential benefits of developing a HPA. (*Leaflet 12*)

MOD Heritage Report 2011–2013 (MoD, 2014) conceded:

42. These [financial] challenges will require the Department to work even closer with its heritage partners, sharing their collective limited resources and being creative in delivering sustainable solutions to the challenges ahead.

Conserving and enhancing the historic environment (Department for Communities and Local Government, 2014) notes that ‘the risks of neglect and decay of heritage assets are best addressed through ensuring that they remain in active use that is consistent with their conservation.’ (Paragraph: 003 Reference ID: 18a-003-20140306 Revision date: 06 03 2014)

Defence Infrastructure Organisation estate and sustainable development (Ministry of Defence, 2012–2017) asserts:

For sites which a high heritage value Conservation Management Plan (CMP) are increasingly being developed. CMPs assess the history of the site in detail and assign significance to different aspects enabling important decisions to be made about the site.

It discusses the benefits of MoD Conservation Groups which provide ‘a forum in which the ecological and archaeological management of a site can be discussed with internal and external stakeholders.’

A Conservation Statement leading to an effective Conservation Management Plan, supported by a Heritage Partnership Agreement or a MoD Conservation Group, is therefore a matter of urgency.

With regard to the remaining dockyard railway lines, *MOD Leaflet 12* stated:

12-112. The Railway Heritage Committee is a statutory body with the power to list structures and artefacts associated with railways. Such listings will have implications for their care and management. The HET is the point of contact for any heritage railway artefacts.

4. The Conservation Statement and effective Conservation Management Plan should:

- describe the assets and their heritage values

- detail the history and explain the significance of the assets
- define their condition
- define baseline conditions to be achieved
- define how their significance will be retained in any future use, management, alteration or repair
- include a business case
- include a business and financial plan
- define specific conservation management aims, objectives and policies in relation to condition
- develop work programmes and monitoring schedules
- identify development potential or constraints
- identify community stakeholders
- include appendices of designations, local plan policies

MOD Heritage Report 2011–2013 (MoD, 2014, para. 37b) reported that ‘A number of Heritage Protection Agreements (HPA), Conservation Management Plans (CMP) and Conservation Statements (CS) have been or were in the process of being developed during the reporting period.’

Detailed guidance is given in: Natural England *Preparing a Heritage Management Plan*, 2008; Heritage Lottery Fund, *Conservation plan guidance*, 2012; Rolph *et al.*, 2015, *Pillars of the community*; Icomos, *Heritage Lottery Fund Conservation Management Plans. A guide* (n.d.).

5. The local planning authority should be more pro-active

In *The Historic Environment: A Force for Our Future* (Department for Culture, Media and Sport, 2001, under The Historic Environment – A New Vision, para. 9) the DCMS ‘looks to a future in which: public interest in the historic environment is matched by firm leadership, effective partnerships, and the development of a sound knowledge base from which to develop policies’.

Under ‘Local government leadership’ (para. 1.3) it stressed that the role of local authorities: ‘in the stewardship of the historic environment is of fundamental importance.’ It further asserted:

The Government looks to local authorities to adopt a positive approach to the management of the historic environment within their area and the monitoring of its condition. It urges authorities to appoint champions for the historic environment within their management structures.

DCLG Circular 02/2006. Crown Application of the Planning Acts (Department for Communities and Local Government, 2006) stated that:

40. Under the new provisions, a local planning authority can serve a notice or make an order (other than a court order) intended to enforce compliance on Crown land without having to follow any procedures other than those which are already set out in the planning Acts as being generally applicable.

The *Protocol* (Historic England, 2009, para. 8) stated that the Crown must now ‘Comply with the statutory procedures that regulate works to heritage assets. Crown bodies no longer benefit from immunity from the planning acts.’

Conserving and enhancing the historic environment (Department for Communities and Local Government, 2014) noted that

Local planning authorities must review their conservation areas from time to time ([section 69\(2\) of the Planning \(Listed Buildings and Conservation Areas\) Act 1990](#)).

And:

A conservation area appraisal can be used to help local planning authorities develop a management plan and appropriate policies for the Local Plan. A good appraisal will consider what features make a positive or negative contribution to the significance of the conservation area, thereby identifying opportunities for beneficial change or the need for planning protection. (Paragraph: 025 Reference ID: 18a-025-20140306 Revision date: 06 03 2014)

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