

# Conservation & Built Heritage



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# 1. Introduction

- 1.1. The Local Planning Authority (LPA) is currently engaged in preparing a new Local Plan for the City of Portsmouth. This process involves a review of policies for the plan, and is supported by a number of background/topic papers that seek to set out the evidence base in support of the review. These documents bring together and discuss background analysis, guidance and policy on key issues within their theme. This paper addresses the city's historic built environment, its scope is however limited to matters of relevance to policy in the emerging Local Plan, and other related policy documents that support the Council's heritage/ conservation planning function.

## Overview of Content and Summary of Findings

### Part 1 Issues relating directly to plan preparation

- 1.2. The first part of the paper considers those areas of practice relating most directly to the plan. It is structured to:

- Provide an overview of the City's stock of designated and undesignated assets
- Provide a high level narrative of the historic development, characteristics and significance of the city's historic built environment.
- Identify key messages relating to plan preparation from national policy and guidance.

*The principle message of current policy is that plans should set out a positive strategy for the conservation of the historic environment. Emphasis is also placed on identifying viable uses for assets that are 'at risk'. In response to this, a Heritage Strategy, and review and enhancement of Conservation Area Appraisal and Guideline Documents are suggested.*

- Examine heritage related policy in the current Local Plan and the related enhancement of the Council's existing Conservation & Design policy for the new plan, and discuss the introduction of new policies relating to 'Heritage at Risk' and archaeology for the new plan.

*The paper confirms that conservation and design policy within the existing plan will be revised and expanded to address with greater clarity and in more detail, design considerations which arise out of development proposals affecting not only Conservation Areas and Listed Buildings, but also other classes of asset. Separate and discrete policies relating to archaeology and 'buildings at risk' will also be incorporated into the plan.*

- Consider areas of potentially significant change that may impact on heritage assets (as a result of the Authority's Housing and Employment Land Availability Assessment exercise, and major allocations through the revised local plan).

*A GIS 'sieve mapping' exercise has established that a limited number of assets (approximately 20 listed buildings and 2 Scheduled Ancient Monuments) overlay, or*

*sit in close proximity to current site allocations. This proximity does not preclude their allocation. Any potential impacts would be managed through the Development Management process, relevant legislation and national/local planning policy. Where necessary it may be supported by site specific briefs, and the inclusion of relevant sites in other supporting policy documents such as SPD's.*

- Provide a brief overview of the city's archaeology, and discuss the current and ongoing approach to the provision of archaeological services for the Authority.

*The management of Archaeology has undergone review and significant change in the last 5 years. This review strengthened and improved this service to the satisfaction both of the Council and its contracted archaeology provider. Beyond the suggested (re)introduction of a specific policy within the local plan to address archaeology, and continued monitoring of the imposition of archaeological conditions, it is recommended that the LPA make no change to its approach to planning and archaeology.*

## **Part 2 Issues relating to the wider framework of supporting conservation documents**

- 1.3. In the interests of ensuring comprehensive consideration of the topic, the second part of the paper goes beyond the immediate concerns of policy within the plan itself. The net is 'cast wider', and the framework of supporting documents, policies/guidance and processes (and the heritage issues, objectives and practice they address) are also considered. Although they fall outside the relatively narrow purview of the Local Plan itself, they nevertheless 'hang off' of relevant policy, relate back to the objectives of the plan and/or are important in setting out and securing a wider positive strategy for the conservation and enjoyment of the historic environment.
- 1.4. Discrete themes/work areas considered in this part of the paper include:
  - Conservation Areas - New publication and review of Appraisal/Guideline Documents, Future designation of areas, and 'Article 4' Directions.
  - The Council's 'Local List', its review and updating, and the addition of new assets to the list.
  - 'Heritage at Risk' in the city and a 'Heritage Strategy' for the Council.
  - Public Realm and street furniture in historic areas.
  - The Council's approach to the management of its own heritage assets.
- 1.5. The main body of the paper discusses these themes in detail. Baseline information around current policy/guidance and the Council's future approach to these areas of practice is discussed. A range of 'tasks'/work streams relating to each theme are also identified. These are aggregated in an overarching table (found below) which summarises the tasks alongside associated options and recommendations. The table also gives an indication of the time required to complete the tasks, and prioritises them against one another. The resource implications of taking forward the tasks is also considered (below).

## Summary table of themes and related tasks

No.	Theme/task	Options	Recommendation/ Task(s) to Action	Time implications	Priority Level
<b>1</b>	<b>Theme: Conservation Areas</b>				
1a	<b>Task:</b> Draft, consult and adopt new conservation area appraisal/guideline documents for 3 conservation areas	Prepare as standalone exercise	Recommended	4-5 mth (per doc) 12-15 mth total	High
1b	<b>Task:</b> Review, update consult and re-adopt existing (22) conservation area appraisal and guideline documents	1 Standalone review	Recommended	24-36 months	High
		2 'De-couple' Guidelines from appraisals	Not Recommended		
1c	<b>Task:</b> Review existing, and designate and confirm new conservation areas	No Action	As Option	N/A	V.Low
1d	<b>Task:</b> Designate and confirm new Article 4 Directions	No Action	As Option	N/A	V.Low
<b>2</b>	<b>Theme: Local List</b>				
	<b>Task:</b> Review/update existing local list (and address nomination of new assets)	1 'Pro-active' review	Not Recommended	3-5 months	Intermediate
		2 'Re-active' review	Recommended		
<b>3</b>	<b>Theme: Heritage at Risk and Heritage Strategy</b>				
3a	<b>Task:</b> Review/update and adopt existing (unadopted) Register of grade II and other assets at risk	As Task	Recommended	4-6 months	Intermediate
3b	<b>Task:</b> Review, re-draft and adopt existing (unadopted) 'Heritage Strategy'	As Task	Recommended	4-6 months	High
<b>4</b>	<b>Theme: Heritage and Public Realm</b>				
	<b>Task:</b> Review and re-draft existing heritage related public realm guidance 'Roads and Street Furniture in Historic Areas'	1 Take forward through existing (unadopted) urban design guidance	Not Recommended	4-6 months	Low
		2 Review existing document	Recommended		
<b>5</b>	<b>Theme: Management of the Council's heritage assets</b>				
	<b>Task:</b> Draft guidance to aid relevant Council departments on the appropriate management of the city's heritage assets.	As Task	As Option	2-3 months	Low
<b>Total</b>				49-77 months (4 - 6.4 years)	

## Rationale for prioritisation

- 1.6. The priority level identified for each task responds to a range of factors including (but not necessarily limited to): Their alignment with the Council's wider corporate priorities, recommended good practice, and the constraints imposed by resource limitations. It also reflects a judgement on which tasks would most optimally serve the positive and proactive management of the Authority's heritage assets.

## High priorities

- 1.7. Progression of any of the tasks that have been outlined is desirable; however the table identifies three priorities that are considered 'high'. These include: The review, re-drafting and adoption of a 'Heritage Strategy' for the city, The review, updating consultation and re-adoption of the Council's 22 existing conservation area appraisal and guideline documents, and the drafting of new appraisal and guideline documents for 3 conservation areas.

## Time Requirements and resource implications

- 1.1. The suggested times required to undertake these tasks provide guidance only. They are based on past experience/practice, and assume that any task is undertaken by a dedicated resource (uninterrupted by other priorities). They acknowledge not only the (re)drafting of any documents, but also their researching, formatting (including possible transfer from one software package to another), public (and other) consultation, and the requirements of formal adoption.
- 1.2. Engagement with these tasks would update and enhance guidance for stakeholders, and provide the Authority with a more strategic and proactive posture around the regeneration of heritage assets. These are all positive actions that would demonstrate the Council's ongoing commitment to conservation of the city's heritage assets. Their scale and nature is however significant. The three highest priorities identified potentially equate for example to up to 3-4 years of work, and would need to take place alongside existing and other ad hoc future work streams. In this context, their timely completion, (without the application of extra resources), would realistically be very challenging. In light of this a range of potential resourcing options is given some consideration below (the financial/cost implications of these are not however discussed).
- 1.3. A team oriented approach to the issue would suggest either a permanent full (F/T) or part time (P/T) assistant (or potentially more senior) conservation officer role. In addition to addressing the priorities identified, this approach would also strengthen the Council's conservation function, (which has been provided by a single resource for some time), expanding the capacity and scope of service provision and enhancing resilience. For these reasons, (and from a purely service perspective) it is considered the most desirable. Alternatives to this might include: A similar role on a more limited (non-permanent) contract of sufficient length (3-4 years) to address priority tasks. A more 'ad hoc' solution focussed on the use of experienced specialist heritage consultants to undertake some of the key priority work streams could also be

expeditious. Other options could include the use of relevant graduates or other students on work experience, or the possible use of an apprentice.

### Relationship to progression of the emerging plan

- 1.8. The range of issues and actions discussed in the paper provide a comprehensive, carefully considered and (from the perspective of the Council), a satisfactory response to the question of heritage issues in relation to allocations and wider aspects of the Local Plan. The tasks that have been identified are important to achieving a positive strategy for the enjoyment of the historic environment, they are however complementary, rather than absolutely critical, to progression of the emerging plan. In light of this progress on the plan is not considered contingent on these tasks, knowing however that they are in train provides additional confidence that heritage issues are being appropriately addressed by the Planning Authority.
  
- 1.9. An appendix is also provided in this topic paper (Appendix A). It provides a summary of Historic England's response, and a response to the points raised by HE during the Council's 'Issues and Options Appraisal' 2017.

## 2. Portsmouth's historic environment

### Its development, characteristics and significance

- 2.1. Portsmouth is a unique island city with an historic environment that is extensive and diverse both geographically and in time. Its buildings and buried heritage tell the city's story, contributing to its senses of place, and community and its local distinctiveness.

### Overview of the City's assets

- 2.2. The table below provides an overview or 'snapshot' of the number of the city's heritage assets:

Asset Type	No. of Assets (2019)		No. of Assets (2012)	
Scheduled Ancient Monuments (SAM)	17		17	
	List Entries	Individual Buildings/ Structures	List Entries	Individual Buildings/ Structures
Statutory Listed Buildings	463	707	460	704
Grade I	21			
Grade II*	34			
Grade II	483			
Conservation Areas (Article 4 Directions)	25 (28)		25 (28)	
Registered Historic Park	3		3	
Locally Listed Buildings	264		264	

#### Source of the figures

The figures are based on an analysis and count of a hard copy of the 'List of Buildings of Special Architectural and Historic Interest for the City of Portsmouth' held by the Authority (up to and including the 6th amendment of the list dated March 1999). They also incorporate all subsequent 'ad hoc' additions made to the list by English Heritage and its successor organisation Historic England since that date.

#### Definitive Record

The figures in the table are considered by the Council to be an authoritative and definitive record of the number of assets in the city. It should be noted however that other sources are available (including the Historic England website). These sources and/or alternative interpretation (by third parties) of the list entries/descriptions of assets may produce figures that do not tally exactly with the numbers identified here).

## The Royal Navy and the Shaping of the City

- 2.3. Portsmouth has been shaped for most of its history by the presence of the Royal Navy, an association that stretches back almost a thousand years. In the 19<sup>th</sup> century, at the height of the industrial revolution, the city cemented its status as the country's pre-eminent naval base. The legacy of this period is exceptional - one of the greatest concentrations of historic military architecture in Europe, not only in the number of grade I and II\* listed buildings in the historic dockyard but also the diverse range of listed and scheduled forts and castles that ring the city. This legacy has been and remains the key driver in people's perceptions and recognition of the city. It is also critical to its economic vitality, attracting very large numbers of tourists not only to the historic dockyard, but also to its historic waterfront.

### The dockyard and its impact

- 2.4. Dockyard expansion in the 18<sup>th</sup> and 19<sup>th</sup> centuries created one of the single largest industrial sites in the world indelibly stamping its character on the city and its inhabitants, it also bestowed a strong reputation for engineering innovation. This is nowhere better exemplified than in the grade II\* listed Block Mills, the site of a revolutionary 'manufactory' using machine tools to produce blocks and pulleys for the navy. Designed by Marc Brunel, father of the famous engineer Isambard Kingdom (who was born in Portsmouth), the machines and the processes associated with their use would herald the age of mass production 100 years before the work of Henry Ford.



Figure 1 - HMS Warrior

- 2.5. The city's rise to industrial powerhouse was mirrored by rapid physical expansion. From the mid-19<sup>th</sup> to the early 20<sup>th</sup> Century over 60,000 terraced houses were built, many for working class labourers and artisans employed in the dockyard. (The best examples of which are protected within a number of the city's 25 conservation areas). In addition an infrastructure of parks, churches, theatres, cinemas, hospitals and other buildings was developed to serve the town's leisure, health and pastoral needs (a very high proportion of which are protected through designation). This legacy is significant, illuminating the social, military and cultural past of the city, and thereby contributing very strongly to its identity, and 'sense of place'.

## Southsea

2.6. In the early 19th Century the southern part of Portsea Island began to develop differently. Under the 'guiding hand' of local architect T.E. Owen, Southsea emerged as an elegant and picturesque satellite settlement catering to the housing needs of military officers and a burgeoning middle class. Its attractive historic core is also a conservation area and has a wealth of listed gothic influenced villas designed by Owen. In addition Southsea Common an extensive pleasure ground and one of three registered historic parks in the city (Including Victoria Park in the City Centre and Kingston Cemetery) serves the needs not of Southsea, but the whole city. In combination with several miles of seafront promenade it provides a waterfront of exceptional quality. Its scale and openness, (largely uncluttered by the intrusion of development), are perhaps unrivalled by any city of comparable size in the country.

## Other highlights

2.7. Other highlights include the civic pride of the City's listed neoclassical (but rebuilt) Guildhall, and the birthplace of Charles Dickens perhaps the city's most famous son and one of a number of Britain's greatest writers including H.G. Wells, Sir Arthur Conan Doyle, Rudyard Kipling and Neville Shute that lived and worked in Portsmouth.

## 20<sup>th</sup> Century

2.8. The city's fortunes reached a low ebb in the mid-20th century. In the Second World War, after London, it was amongst the most heavily bombed cities in Britain. Over six thousand buildings were totally destroyed, and tens of thousands damaged. Reconstruction was relatively slow and left its mark not only in a series of mass housing estates but also in the administrative and commercial heart of the city which has a modest number of high quality modernist buildings. A small number of 20th Century sites, including the city's two most important war memorials, and the former European headquarters of IBM (designed by Norman Foster) have been listed.

## The significance, value and potential of the city's built heritage

2.9. The significance and value of heritage assets provides the rationale for their preservation and/or conservation. It should underpin and motivate all decision making around both the strategic and individual (site by site) approach to their care.

## What is significance?

- 2.10. The significance of built and below ground heritage finds expression in different ways. The National Planning Policy Framework (NPPF), and guidance from Historic England ('Conservation Principles') identify it as the 'heritage interest' of an asset or site. This interest may be: archaeological, evidential, communal, aesthetic or historic.
- 2.11. Although these factors are 'universal', they will not capture the significance of all assets in all circumstances. Their relative importance will vary according to the nature of an asset and its setting. They can however be considered to represent or embody the 'intrinsic value' of a site.

## 'Intrinsic' value

- 2.12. This intrinsic value does not automatically justify the preservation of assets, the NPPF does however make clear that it is sufficient reason, on its own, for their protection and conservation. It must therefore be regarded as the fundamental basis of the designation of all of the city's assets, and the key motivating factor underpinning all objectives for their management.
- 2.13. The NPPF also makes clear that assets must be conserved not only for their "contribution to the quality of life of existing and future generations" (Para 184) but also for the "wider social, environmental and economic benefits that conservation of the historic environment can bring" (Para 185). These wider external values are briefly explored (and related back to the circumstances of Portsmouth) in more detail below.

## Economic value

- 2.14. Built heritage is a vital component of the national and local economy, It supports recreation, tourism, and inward investment across a range of economic spheres. Examples of the contribution heritage makes to economic and business activity in the city include:

- The impacts associated with the day to day operations of heritage attractions/facilities. This can be seen in the local spending (£400 million plus) and employment (approximately 7000 jobs) generated by the approximately 7 million visits made to historic attractions in the city every year.
- The (temporary) impact associated with capital works, including the restoration, repair and maintenance of heritage assets. Every planning permission or consent implemented in the city generates employment and sustains the skills and experience of the trades and professions associated with historic buildings.

- 2.15. These outcomes align strongly with the government's growth agenda. They are nurtured and sustained in Portsmouth (as elsewhere) through the ongoing drafting and implementation of relevant national and local policy, and in day to day decision making that secures the positive heritage centric evolution of the built environment in the city.



*Figure 2 - Royal Garrison Church*

Notwithstanding this, scope exists for a more strategic, focussed and dynamic approach to unlocking the economic potential of some of the

city's heritage assets. This approach rests on identifying those sites which offer significant potential for enhancement and regeneration.

### Regeneration potential.

- 2.16. There is a strong economic case for the regeneration of heritage assets. The benefits accruing from this relate not only to individual buildings, but also to the wider area and communities these buildings serve. Critical to the success of this approach is identifying and/or maintaining a viable economic use that can support refurbishment, repair or maintenance and provide a reasonable return on investment. The added attraction provided by the appeal of an historic site make heritage assets a particularly effective catalyst for this type of change.
- 2.17. The city as a whole has a track record in this area. A number of organisations including: private developers, charitable trusts and the City Council itself have had considerable success in the last 30 years in promoting and securing significant heritage based regeneration schemes. Highlights include the numerous enhancement schemes which have taken place within the Historic Dockyard over the last 10 years (Boathouse 6, Boathouse 4, The Mary Rose Museum. Outside of the yard prominent recent successes include the 'Hotwalls' artist's studio project in the 17<sup>th</sup> Century fortifications at the mouth of Portsmouth Harbour.
- 2.18. From a policy and practical perspective, working to unlock the regeneration potential of the city's assets and securing the implementation of new schemes, is considered initially at least to be best served through the drafting and adoption of a 'Heritage Strategy'. (This is discussed in more detail in the relevant section below).

### Social and environmental value and potential

- 2.19. The historic environment facilitates and encourages civil society in the city. It supports leisure, cultural and educational activities among school children and the wider public. Activities that are positive both for individuals and communities.
- 2.20. Under certain circumstances heritage assets can also act as a 'catalyst' galvanising local groups and third sector organisations (such as charitable trusts), into action. Examples of this in Portsmouth include the trusts tasked with running the city's three principle theatres. More recently preservation trusts have also emerged to conserve and improve the medieval Wymering Manor (the oldest building in the city) and the 1930's Hilsea Lido, both located in the north of the city.
- 2.21. Remnants of the city's pre-industrial landscape such as Portsdown Hill, and other historic open/green spaces, (Hilsea Lines, Southsea Common and other parks and cemeteries), all promote and encourage access to heritage assets. Their appeal as historic places enhances their attractiveness as places for leisure and recreational activities contributing to their value in promoting healthier lifestyles.
- 2.22. The retention and re-use of buildings is inherently more sustainable than any alternative form of development. Historic sites and buildings have already demonstrated their resilience, and their continued use (and re-use) offers major

environmental advantages over demolition and reconstruction. It also reinforces distinctiveness in the built environment enhancing quality of life in a way that purely newbuild solutions typically do not.



*Figure 3 - Theatre Royal, Guildhall Walk*

### 3. Relevant national policy/guidance

#### National Planning Policy Framework (NPPF)

- 3.1. Following the publication of a revised NPPF (July 2021), chapter 16, paragraphs 189-208 of the new document address 'Conserving and enhancing the historic environment'. These policies focus principally on the assessment of assets and analysis of impacts within the context of decision taking in the development management (DM) process. This makes them an important point of reference when considering the number, content, scope and objectives of possible DM policies related to heritage/design for the new local plan.
- 3.2. In addition at paragraph 190 a more strategically focussed policy is outlined, which specifically addresses the question of the historic environment and plan preparation. It makes clear that: *"Plans should set out a positive strategy for the conservation and enjoyment of the historic environment, including heritage assets most at risk through neglect, decay or other threats. This strategy should take into account:*
  - *The desirability of sustaining and enhancing the significance of heritage assets, and putting them to viable uses consistent with their conservation....."*
- 3.3. The reference to assets 'most at risk through neglect, decay or other threats' is notable, implying a desire to see these managed and enhanced more effectively through the local plan, any related supporting supplementary policies or documents and their implementation. This objective is reinforced by subsequent discussion around enhancement and 'viable uses'.

#### Planning Practice Guidance (PPG)

- 3.4. National PPG also addresses 'Conserving and enhancing the historic environment'. (Much of the relevant guidance provided in the PPG was last revised in July 2019 to reflect the then revised NPPF).
- 3.5. PPG makes clear that heritage assets are an "irreplaceable resource", that their conservation forms one of the 'Core Principles' that underpin the planning system, and that their protection and enhancement is an important component of the NPPF's drive to achieve sustainable development.

#### Plan making: Historic environment

- 3.6. At paragraph 003 (Reference ID: 18a-003-20190723) it provides a more expansive definition of a positive strategy for conservation. Such a strategy should "recognise that conservation is not a passive exercise.....LPAs should identify specific opportunities within their area for the conservation and enhancement of heritage assets". It also recognises that "the delivery of the strategy may require the development of specific policies, for example, in relation to use of buildings and design of new development and infrastructure"

### Other relevant national guidance

3.7. In addition to national policy advice and guidance published by central government, Historic England (the government's advisor on the historic environment), have also published a number of guidance notes offering advice to support LPAs in drawing up Local Plans. Of these the most relevant to the plan making process are:

- Good Practice Advice Note 1 (March 2015)
- 'The Historic Environment in Local Plans'
- Good Practice Advice Note 3 (Dec 2017)
- 'The Historic Environment and Site Allocations in Local Plans'

### Key message of national policy and guidance

3.8. The key message conveyed by national policy and guidance centres around the idea of a positive strategy for conservation. As has been noted, in addition to the development of specific policies in relation to the design of new buildings, measures should also be undertaken to develop policies around the use of buildings, and the identification of specific opportunities for the enhancement of assets.

3.9. The Council's approach to review of the local plan responds to this agenda with proposed changes around DM related conservation policies, suggestions for a heritage strategy, and the review and enhancement of existing documents such as Conservation Area Appraisal and Guideline Documents.

## 4. Conservation policy in the new Local Plan

### Background

- 4.1. Conservation and heritage are important factors in active real-world planning discussion both at the strategic level, and on an asset by asset basis. In light of this the policies and strategies associated with the plan should identify its importance and clearly set out appropriate criteria, strategies and objectives for those considering development.

### Current situation

- 4.2. The Current Local Plan (adopted 2012) contains a policy (PCS 23) which combines consideration of design and conservation issues into a single policy, this approach has functioned effectively for this and other Planning Authorities and is considered appropriate. It is notable however that other heritage/conservation specific policies are absent within the current Local Plan.
- 4.3. The previous plan adopted in 2006, (dealing with the period 2001-2011), did contain a number of policies - DC10 Conservation Areas, DC 11 Listed Buildings, DC 12 Locally Important Buildings and Monuments, DC13 Historic Parks and Gardens and DC 15 Archaeological Sites and Monuments, that addressed these discreet areas.
- 4.4. As has been noted the absence of a range of separate policies (similar to those found in the previous plan) is not considered to have impeded effective decision making around conservation assets. Notwithstanding this limited additional policies have been identified as necessary in relation to Archaeology and Buildings at Risk.

### Going forward

- 4.5. As part of the preparation of the Local Plan, dedicated policies have been drafted for the broad areas of design, heritage and archaeology and heritage enhancement. Draft Policy D5: Heritage and Archaeology seeks to ensure the appropriate conservation and, where possible, enhancement of the city's heritage assets ensuring that all proposals must conserve or enhance the city's assets in a manner appropriate to their significance. Draft Policy D6: Heritage Enhancement encourages the creative re-use of heritage assets and sets the intention to seek remedial solutions for assets 'at risk'.
- 4.6. The scope and wording of the policy has been expanded to address with greater clarity, and in more detail, design considerations which arise out of development proposals affecting not only Conservation Areas and Listed Buildings, but also Locally Listed Buildings, Scheduled Ancient Monuments and Historic Parks and Gardens.
- 4.7. Notwithstanding that past practice has demonstrated a relatively limited call on such policies (from a purely development management perspective), it is acknowledged that addressing archaeology, and heritage at risk within the suite of DM policies would be beneficial both practically and as 'expressions of intent' within the new plan.

## Recommendation(s)

- 4.8. That two separate heritage related policies are included in the new Local Plan, so their scope has been clarified to ensure its relevance to all classes of asset including archaeology and its wording expanded to provide greater clarity and detail around the Authority's policy requirements for these areas and that buildings at risk are protected.

## 5. Areas of Potentially Significant Change

### Background

5.1. The Local Plan review process, through its related Housing and Economic Land Availability Assessment (HELAA) and through the identification and allocation of 'Major Sites', has identified a relatively modest, but nevertheless significant range of sites where development has the scope to impact on heritage assets. These include:

- **The City Centre**

5.2. Potential densification and an increase in proposals for tall buildings, have the scope to impact on designated assets such as All Saints and St Agatha's Churches, Designated assets within HMNB Portsmouth and nearby sites including Victoria Park. A draft City Centre Masterplan is being prepared which will take into account the presence of heritage assets

- **St James Hospital Site**

5.3. Conversion and new build development proposals on this site would affect both the fabric and setting of this large grade II listed hospital, and its related (and also listed Chapel).

- **Tipner**

5.4. Proposals under consideration for Tipner would affect the fabric and setting of a number of structures on the peninsular associated with its historic use as a magazine.



*Figure 4 - Tipner West Peninsula*

5.5. There are other smaller development opportunities in proximity to assets that will require careful consideration through the plan making process

## Current Situation

- 5.6. A 'sieve mapping' exercise has also been undertaken – Using GIS layering of potential development sites, and heritage assets to identify overlaps. This revealed approximately 20 listed buildings and 2 scheduled ancient monuments where these assets overlay (or sit in close proximity to) current site allocations.

## Going forward

- 5.7. The allocation or emergence of any sites whether through the local plan process or as 'windfall' raises the question of how potential impacts (and opportunities) stemming from the process will be addressed. This will inevitably be on a site by site basis guided and managed through the Development Management process and relevant legislation and national/local planning policy. Where it is considered necessary it will also be supported by the provision of appropriate site specific briefs, and through the inclusion of relevant sites in other supporting policy documents such as SPD's, and/or where appropriate in other documents such as Conservation Area appraisals and Guidelines and a Heritage Strategy.

## 6. Archaeology in Portsmouth

### Background - The nature of the city's archaeological remains

6.1. The extensive development of historic and modern Portsmouth has left the city poorer in pre urban archaeological remains, with few monuments unconnected to the city's immediate past. There are for example no hillforts, Roman villas or burial mounds. However artefacts recovered during development over the decades do, indicate prehistoric, Roman and medieval occupation must have existed on Portsea Island and areas not compromised by modern development have the potential to shed light on this otherwise lost component of Portsmouth's past.

### Current Situation

#### Historic Environment Record

6.2. Portsmouth City Council resources and maintains its own Historic Environment Record (HER), (a service which is sited in and managed by the Council's Museum Service). The HER is an important tool in the Development Management process, and the NPPF makes clear that it should where appropriate be consulted by applicants, (a requirement which is re-iterated in the LPAs local application submission requirements). Current entries (records) in the Portsmouth's HER stand at:

786	Buildings
190	Archaeology Find Spots
11	Landscape Features
22	Off Shore Maritime Records
646	Archaeological sites/monuments

#### Other Archaeology Services – Hampshire

6.3. In addition a range of standard DM related archaeological services are provided to the Council through a Service Level Agreement (SLA) with Hampshire County Council's Archaeology Service. The Authority draws on the County Council's historic records, thorough knowledge of the city and their expertise to provide:

- Comments on strategic allocations.
- Consultation on individual applications (where archaeological issues might arise)
- Pre-application advice.
- Reviews of the provisions for recording archaeological remains put at risk by development. (Written Schemes of Investigation)
- Implementation of recording actions (Reports of Findings), and making results available.
- Oversight/assistance with drafting appropriate archaeological conditions.
- Any other archaeological related work that the Authority considers appropriate.

These services enable the planning authority to satisfy itself that proposals are acceptable in relation to its responsibilities to the city's archaeology, government guidance, and policy.

### 'ALERT' Map

6.4. In addition to the HER and DM advice services, the Authority also has an 'ALERT' Map. The map is intended to assist in the development management decision making process. It seeks to balance the data in the HER with the diverse nature of planning applications. It identifies 12 broad locations ('Areas of Archaeological Potential'), where planning applications are more likely to have archaeological implications. Notwithstanding that most major developments are consulted upon, the map is utilised in the development management process to prompt formal consultations with Hampshire. It is also maintained and reviewed with the County Council's assistance.

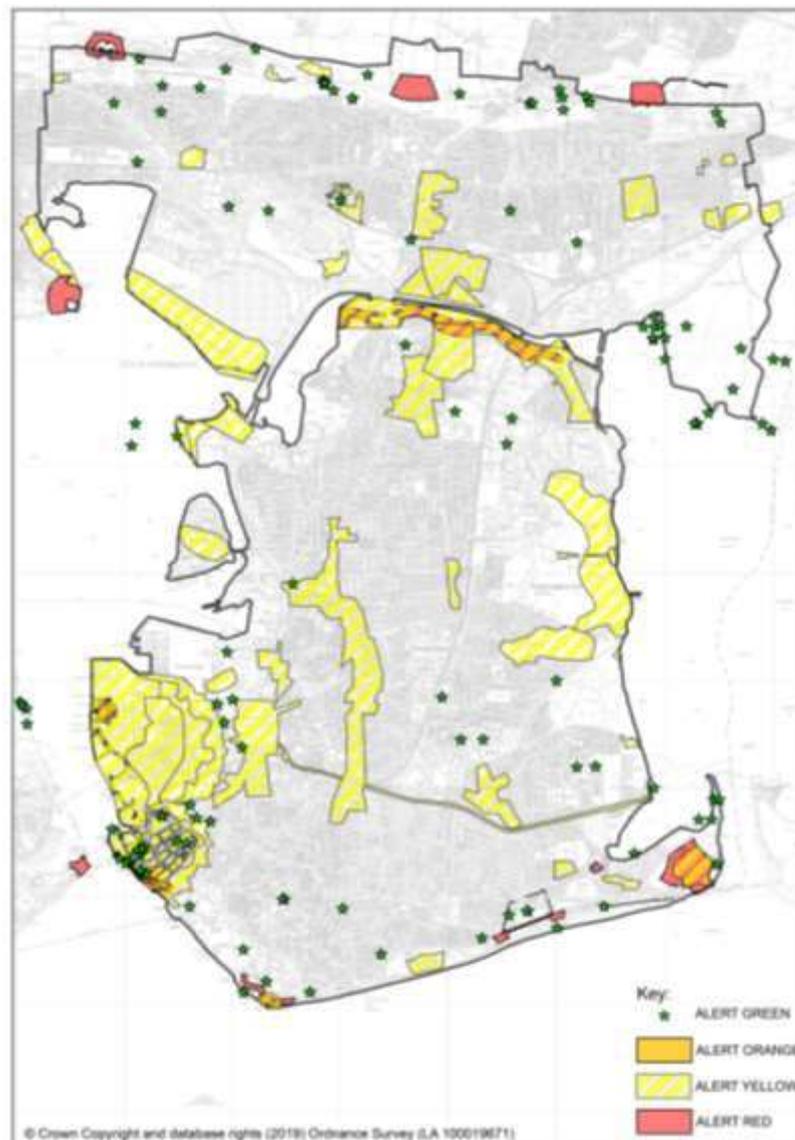


Figure 5 - 'ALERT' Data Map

## Recommendation

- 6.5. The manner in which the LPA has dealt with archaeology has undergone significant review in the last 5 years. This review strengthened and improved its approach to the satisfaction both of the Council and its contracted archaeology provider.
- 6.6. Beyond the suggested addition of archaeology to the new heritage policies within the local plan, and continued monitoring of the imposition of archaeological conditions, it is recommended that the LPA make no change to its approach to planning and archaeology, or the arrangements for archaeological services provided by Hampshire County Council. (Review of the terms and requirements of the SLA will however be necessary as and when required).

## Time implications

- 6.7. Adoption/continuation of this approach would have no time or resource implications

## 7. Conservation Areas (CA)

### Background

- 7.1. Since the Civic Amenities Act (1967), Planning Authorities have been able to designate areas of *'special architectural or historic interest, the character of which it is desirable to preserve and enhance'*. Portsmouth's first CA, Stanley Street, Southsea was designated in 1968. Since that first designation, a further 24 areas have been designated, some of these have also been subject to amalgamation/rationalisation, and/or extension. (Which accounts in some instances for their non-chronological numbering). The last CA to be designated in the city was St David's Road Southsea in March 2008. The table (below) lists all 25 of the city's CA's, and sets out key data relating to their management.

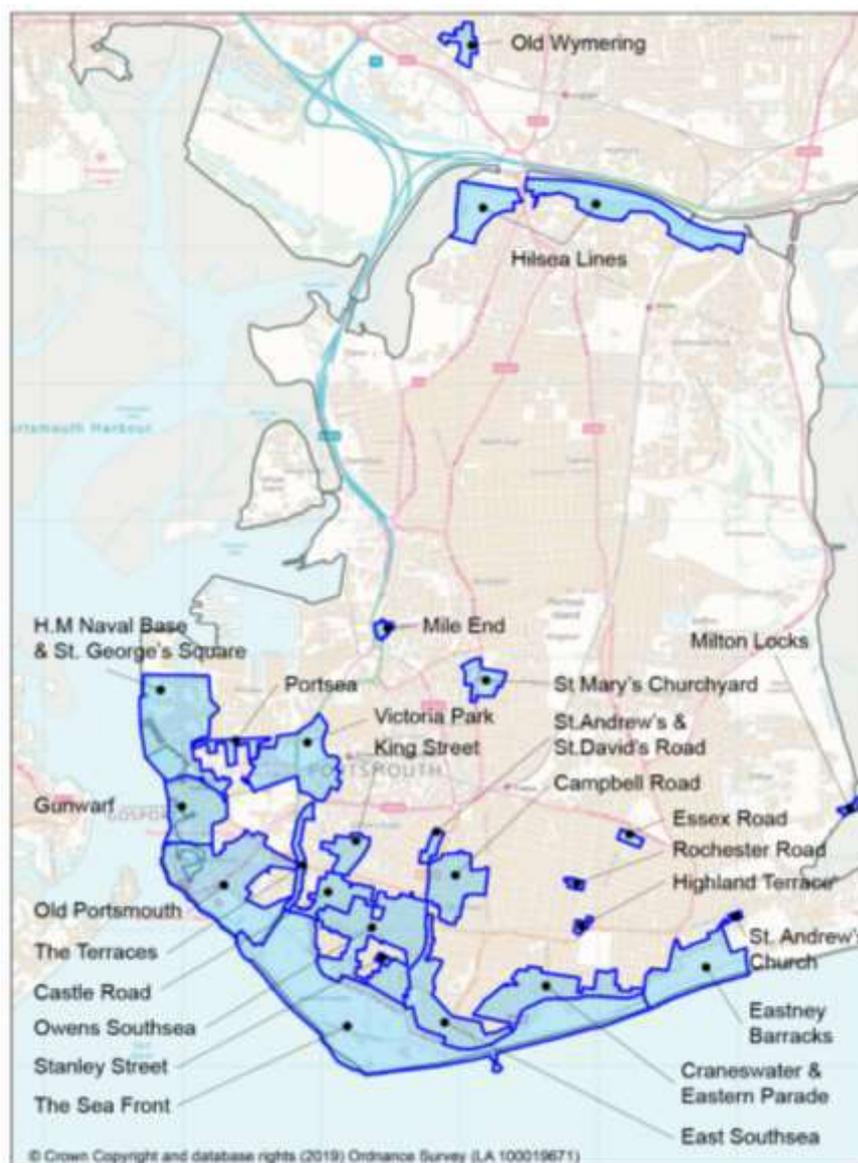


Figure 6 - Conservation Areas

Table 1 - Conservation Areas

No	CA No	Name/Location	Date of Designation	Article 4 Direction(s)	No. of Direction(s)	CA Appraisal & Guideline Docs	Date of first publication	Date of last Review
1	1	Stanley Street (Southsea)	02.68	Yes	1	Yes	10.9 4	10.06
2	2	'Owen's Southsea'	09.77	Yes	7	Yes	07.9 4	10.06
3	3	King Street (Southsea)	11.69	Yes	1	Yes	08.9 4	10.06
4	4	Old Portsmouth	11.69	Yes	1	Yes	01.0 4	09.06
5	5	Mile End (Landport)	02.70	Yes	1	Yes	09.9 4	06.03
6	6	The Terraces (Southsea)	09.70	No	0	Yes	08.9 6	11.06
7	7	Highland Terrace	09.70	Yes	1	Yes	08.9 4	10.06
8	10	Seafront (Southsea)	11.71	Yes	1	Yes	03.0 3	10.06
9	11	Old Wymering	11.71	Yes	1	Yes	08.9 4	10.06
10	12	Castle Road (Southsea)	11.71	Yes	4	Yes	12.9 8	10.06
11	15	Campbell Road (Southsea)	03.72	Yes	5	Yes	04.1 0	N/A
12	16	St Mary's Churchyard (Fratton)	03.72	No	0	Yes	08.9 4	10.06
13	17	Eastney Barracks	01.71	No	0	No	N/A	N/A
14	18	Guildhall & Victoria Park	01.73	No	0	Yes	08.9 6	11.06
15	19	East Southsea	11.73	No	0	Yes	08.9 6	11.06
16	21	Milton Locks	02.77	No	0	Yes	02.9 7	08.03
17	22	H.M.N.B. & St George's Square	01.81	No	0	No	N/A	N/A

No	CA No	Name/Location	Date of Designation	Article 4 Direction(s)	No. of Direction(s)	CA Appraisal & Guideline Docs	Date of first publication	Date of last Review
18	23	Portsea	01.81	No	0	Yes	11.04	N/A
19	24	Rochester Road (Southsea)	10.90	Yes	1	Yes	04.94	06.04
20	25	Gunwharf	01.92	No	0	No	N/A	N/A
21	26	St Andrew's Church (Southsea)	01.92	No	0	Yes	03.04	N/A
22	27	Hilsea Lines	11.94	No	0	Yes	04.09	N/A
23	28	Essex Road (Southsea)	11.04	Yes	1	Yes	02.05	11.06
24	29	Craneswater & Eastern Parade	04.05	Yes	2	Yes	12.05	07.07
25	30	St David's Road (Southsea)	03.08	Yes	1	Yes	12.09	
	(25)	<b>TOTALS</b>			<b>28</b>	<b>22</b>		

### The role of CA Appraisal & Guideline Documents and Article 4 Directions

- 7.2. Article 4 directions and Appraisal and Guideline Documents both play a critical role in the management of CAs, the former by curtailing the scope of permitted development rights in relation to single dwelling houses, the latter by articulating the 'special interest' (significance) of an area to stakeholders, and through their related guidelines by providing a framework to guide decision making through the development management process. As such they make an important contribution to meeting the current national policy objective for a 'positive strategy' for the conservation and enjoyment of the historic environment.
- 7.3. The table (above) indicates whether or not the CA has any 'Article 4' directions in place, and the publication and last review date of Appraisal & Guideline Documents for each area.

### Current Situation

#### CAs without appraisal/guideline documents

- 7.4. As the table confirms, of the city's 25 conservation areas three are currently without adopted Appraisal/Guideline documents:
- Eastney Barracks (No.17)
  - Gunwharf (No.25)

- HMNB Portsmouth & St George's Square (No.22)  
(It should be noted that an appraisal document has been drafted for this area, but not formally adopted. It would now require review before this could take place).

7.5. The absence of Appraisal/Guideline documents for these three areas does not leave them without a policy context to inform applicants/stakeholders or guide decision making. This is provided by the relevant chapter and paragraphs (16 and 184 to 202 respectively) of the revised (February 2019) National Planning Policy Framework (NPPF). Notwithstanding this their preparation and formal adoption is of course considered desirable and should be considered a priority.

### Historic England Guidance – benchmark

7.6. Historic England (HE) provide guidance on the preparation consultation and adoption of these documents. (Historic England Advice Note 1 - Conservation Area Designation, Appraisal and Management Second Edition Feb 2019). This guidance should be considered the ideal 'best practice' benchmark in terms of content and procedure for their preparation. Irrespective of whether HE guidance is strictly followed, it must be noted that their drafting and adoption is time intensive. This makes the preparation of even one document quite a significant task. The priority it is given, who undertakes the work and how, could all impact on existing work areas and competing priorities for the Authority.

### Going Forward

#### Option 1

#### Preparation of *new appraisal/guideline documents for these three CA's (as a standalone exercise)*

7.7. Appraisal and Guideline documents (for the three conservation areas that do not have them), are drafted, publicised, consulted upon and adopted on an individual basis as a 'standalone' exercise independent of a comprehensive (and therefore wider and lengthier) review and updating of the Authority's existing Appraisal and Guideline documents.

#### Time implications

7.8. Undertaken as a dedicated task by a single individual without the interruption of other workstreams or priorities, it is estimated that the process of researching, drafting, formatting, consulting and adopting each document could take approximately 18-22 weeks, (equating to approximately 1 year in total for all three documents)

### Review and update of *existing CA Appraisal/Guideline documents*

#### Current documents now dated

7.9. As the table above confirms, the City Council has 22 extant Conservation Area Appraisal and Guideline Documents. All of these documents are available to view on the City Council's website at:

<https://www.portsmouth.gov.uk/ext/development-and-planning/planning/conservation-areas>

The document for the St David's Road Conservation Area (No.30) was the last to be adopted by the Council (December 2009), and that for Craneswater and Eastern Parade (No.29) the last to be reviewed (July 2007). The age and/or last review date of all of these documents, in combination with subsequent changes to national planning policy, now leaves components of them potentially quite dated. In light of this their review and update is acknowledged as desirable. This does not however concede that the current documents are in any way 'invalidated' by their age. They retain a high degree of effectiveness both as a guide to stakeholders, and as a current and ongoing tool in planning decision making.

#### *Duty to review from 'time to time'*

- 7.10. Both legislation (Sec 69 (2) of the Planning (Listed Buildings and Conservation Area) Act 1990, and Planning Practice Guidance make clear that LPAs should review their conservation areas from 'time to time'. This duty to review relates principally to the identification and designation of new Conservation Areas, (rather than the publication/review of appraisal documents),
- 7.11. There is also however a statutory duty (under Sec 71) of the P(LBCA) Act 1990, for the Planning Authority from 'time to time' to formulate and publish: 'proposals for the preservation and enhancement of their conservation areas'. The same section requires that these proposals shall be 'submitted for consideration to a public meeting in the area to which they relate', and that the local planning authority shall 'have regard to any views concerning the proposals expressed by persons attending the meeting'.
- 7.12. Most recent guidance from Historic England, (*para 104 p.39 of their Advice Note 1 on Conservation Area Appraisal, Designation and Management (2nd Edn Feb 2019)*), suggests that: 'resources permitting, every five (5) years is ideal' as a time period for the review of CAs. The same document (at para 105) goes onto suggest that review might typically result in changes to an existing appraisal document recording:
- 7.13. What has changed, setting out any new recommendations; and revising the areas management strategy, and confirming or redefining the special interest that warrants designation.

#### *Current content and division between appraisal and guideline components*

- 7.14. As the title of each document makes clear, their content is currently split between an 'appraisal' of the history, character and qualities of each area (located in the front) and a range of 'guidelines' (located at the rear of each document). The appraisal component of the existing documents contains (but is not necessarily limited to) content such as an analysis of the character of each area, map regressions, historical overviews of spatial development and descriptions of the range of architectural/townscape details found in the area.

### *Total re-write unnecessary*

7.15. The majority of the city's CAs have been subject to gradual evolutionary change whose impact has been relatively modest. For this reason a significant proportion of the description and analysis in the appraisal component of these documents remains factual and credible, and is therefore considered largely to retain its utility both to stakeholders, and in the development management decision making process. In light of this a wholesale re-write of each document, in addition to being impractical from a resource perspective, is also considered unnecessary.

### *'Update' required*

7.16. Notwithstanding this it is acknowledged that the appraisals do however require a re-assessment, rationalisation and 'refresh'. This will necessitate appreciable changes to both text, supporting imagery and formatting. Changes of policy, process (and language) implemented by the NPPF from 2012 onwards, and more recent guidance from Historic England, also make clear that every appraisal requires a statement (or summary) of special interest ('significance'). All of the extant appraisals currently provide an assessment of 'character and appearance', (which is not exactly the same thing).

### *HE advice on content of appraisal documents*

7.17. Historic England Advice Note 1 (2nd edition Feb 2019 p.17) suggests that the 'summary' is the most important section of the appraisal. It should present the most pertinent information to inform decision-makers and should, as far as possible, encapsulate what is different when considering proposals affecting the conservation area compared with anywhere else. It will normally set out:

- A concise statement defining the special historic or architectural interest of the area and the character or appearance that it is desirable to preserve or enhance (so that this can be taken into account in decision-making).
- It might also include bullet points (or a table) to identify individual features or characteristics that contribute positively to the conservation area's character or appearance and how these relate to the special interest, (in order to make this information readily accessible to decision-makers).
- If separate character areas or zones have been identified these should also be described and evaluated. (*Historic England Advice Note 1 2nd edition Feb 2019 p.17*)

7.18. In light of this it is essential that the review process also provides this summary. The existing character assessments will assist in formulating this, but understanding and encapsulating it will be a discrete analytical task requiring careful consideration and realistically will present challenges in terms of both concision, and clarity.

### *Enhanced understanding of weaknesses and problems also beneficial*

7.19. It is also considered that many of the appraisals would benefit from a more robust description and understanding of the weaknesses or problems affecting each area, and how and where townscape and other enhancements could be made that might help to deliver wider social, cultural, economic and environmental benefits. (This

should be undertaken with an eye to the possible pursuit of external funding opportunities for their improvement).

#### *Guideline component - content*

7.20. The guideline elements of each document set out the Planning Authority's position, objectives and desired outcomes in relation to the management of change (through alteration, extension or demolition) in each area. They relate to building components, treatments and architectural details, including (but not limited to) features such as: windows, doors, boundary walls, roofs, masonry and porches, They promote and encourage positive conservation centric processes and outcomes, and provide guidance which is intended to clarify and set out the Authority's approach to change in relation development impacting on these features. (Indicating for example how the removal/replacement of windows would be viewed by the Authority in terms of acceptability). In contrast with the appraisal components of each document, the guidelines have a strong similarity (uniformity) of subject and content. Whilst their scope varies slightly according to the attributes of each area, they address common themes, and their wording is in most instances shared across different documents.

#### *Re-drafting of guidelines also beneficial*

- 7.21. In order to make them more robust, provide all parties with stronger guidance, (enhance their capability to secure more positive conservation centric outcomes), it is considered they would benefit from re-drafting to offer a stronger steer and greater clarity around the Council's expectations and position in relation to changes in CAs.
- 7.22. The similarities across each document also suggest that there may be scope to 'de-couple' them from their related appraisals and republish a single unified set of guidelines which collectively addresses all CAs as a standalone document. (This is considered in more detail in option 2 below)

#### *Going Forward*

- 7.23. Given the time that has lapsed since their adoption or last review, and changes in the national policy context, a review and update of all of the Authority's existing Conservation Appraisal Documents is considered desirable. The importance of the documents in identifying and helping an area to realise its full strategic potential, and in supporting The LPA (and other stakeholders) in decision making, make this a priority task for the Authority.
- 7.24. The aim of any review must therefore be to secure documents whose analysis, rationale/justifications and language have been updated to align them more effectively with legislation and current national policy (ensuring they are more robust and secure against challenge).
- 7.25. Each document is between 30-50 pages long. 22 documents require review. If collated this would equate to a single document of approximately 900 pages length, (three times greater than the Local Plan). This makes a full scale comprehensive review amongst the most significant outstanding conservation related tasks, when

combined with the consideration and attention to detail that is required to ensure a high quality of outcome, it clearly has major resource/ time implications.

- 7.26. Aside from the number of documents, their length, and the rigour necessary to secure high quality outcomes, it should be understood that a number of other factors will inevitably impact on resources and timing. These include:
- 7.27. External and internal consultation requirements. The public in each respective area should be consulted on all new and revised documents. This engagement should be kept to the absolute minimum necessary to comply with legislation (through for example an advertised 'drop in' session), this would also still need to be combined with meeting procedural requirements around publicity, and addressing member consideration and/or formal ratification of each document at either a chair or committee level, prior to publication.
- 7.28. It is also significant that the existing documents are currently available only on Microsoft 'Publisher'. This is now very outdated software that is no longer supported by Microsoft. In addition to work associated with refreshing and updating, review would also therefore require a wholesale transfer of all content to Word, (or possibly an alternative, more sophisticated package such as Adobe InDesign), with any related time issues around formatting that such a conversion process would inevitably generate.

#### *Option 1 – Standalone Review of Appraisal/Guideline Documents*

- 7.29. Review of all of the documents could be addressed as an individual 'standalone' exercise, addressing the re-writing, public consultation and adoption of each document in turn. This approach would retain the same format that unites both an appraisal and guideline component in each document, and could progress (perhaps chronologically) from one document to the next.

#### *Time implications*

- 7.30. Undertaken as a dedicated task by a single individual without the interruption of other workstreams or priorities, it is estimated that the process of reviewing, adapting, re-writing, and re-formatting each document could take 6-8 weeks. Public consultation and adoption could realistically require a further 8-12 weeks (possibly longer). It is therefore estimated that completing a review of all 22 documents in this manner could take approximately 5-6 years. (Even with an increased tempo and greater personnel resources it is estimated that the task would still require 2-3 years of work).

#### *Option 2 – 'De-couple' appraisal and guideline components, proceed with more rapid review of Guidelines*

- 7.31. An alternative approach to reviewing each whole document 'one by one' on an exclusively 'standalone' basis may be possible (or at least worthy of further exploration). A separation or 'de-coupling' of the guideline component of each document from its appraisal element would allow all the guidelines for all existing and new documents to be 'collected', unified, consulted upon, adopted (and republished)

in a single document that stands separately from the appraisals. This approach may offer possible advantages:

- It would avoid the repetition of identical or very similar guidelines found in each separate document.
- It would effectively shorten each document, reducing the time necessary to review its outstanding appraisal component.
- If implemented it would make a comprehensively revised and more robust set of guidelines (applicable across all CAs) available to DM decision makers and other stakeholders more rapidly than through an individual review of each document.

#### *Practical and procedural implications*

7.32. Whilst adoption of this approach would see all of the guidelines comprehensively, 'simultaneously' and more rapidly renewed, it could generate uncertainty around how to proceed with public consultation around a unified set of guidelines. It would also separate or 'disconnect' the guideline component of each document from its related appraisal, leaving the two components 'out of sync' until such time as its review were completed, consulted, adopted and published. It is possible that this situation could potentially make either appraisal or guidelines (or both) easier to challenge. It could also have implications on the preparation and timing of any of the new appraisal documents required for the three conservation areas that do not currently have them.

#### *Time implications*

7.33. Undertaken in a similar manner to option 1 (as a dedicated task by a single individual without the interruption of other workstreams or priorities), it is estimated that the process of analysing all of the existing guidelines collating, unifying and re-drafting them could take 10-14 weeks. Public consultation and adoption of the separated and unified guidelines could realistically require a further 12-16 weeks (possibly longer).

7.34. As has already been noted it would still also be necessary to review, adapt, re-write, re-format, consult and adopt each of the outstanding 22 appraisal elements on an individual standalone basis. It is estimated that this could take at least 12 weeks per appraisal (possibly longer). This suggests a possible overall time frame similar to option 1 of approximately 5 years to fully and comprehensively complete any review.

#### *Recommendation*

7.35. Of the two options presented, option 1 is more straightforward and circumspect in terms of avoiding practical/procedural complexity and/or challenge. Option 2 could however offer a distinct time advantage in terms of the guidelines, but is unlikely to be fully completed (and therefore significantly faster than option 1 overall). In light of these factors, and when considered on balance, option 1 is recommended as the most appropriate course of action. It is also the case that those conservation areas most subject to development pressure could be prioritised for review of their documents, ensuring delivery of the most pressing work in a much shorter timescale.

## Conservation Areas - Future Designations

- 7.36. Details on all of the city's conservation areas are available on the City Council's website at the following link:  
<https://www.portsmouth.gov.uk/ext/development-and-planning/planning/conservation-areas>

### *Current Situation*

- 7.37. The existing number of conservation areas in Portsmouth (25) is high. It ensures a geography of coverage that is very extensive (approximately 10% of the physical area of the city), and diverse, not only by historical period, but also by building/structure typology. This legacy of cover represents a strong success for the LPA.

### *Boundary review and de-designation*

- 7.38. Notwithstanding the special overall qualities of all of the city's conservation areas, it is reasonable to assert that some enjoy greater architectural and historic significance than others. This is a product of their qualities and degree of alteration at the time of designation and their subsequent evolution. Notwithstanding these differences it is not considered appropriate to revisit existing CA boundaries or to entertain or explore the de-designation of any areas. Whilst there are differentials in the quality and levels of conservation between areas, all are considered to retain sufficient character and quality, so as to make such an approach unjustified. It is conceivable that such measures could also be challenging with residents, and would certainly present a strong opportunity cost in terms of the advancement of other more positive and desirable priorities.

### *Going Forward*

- 7.39. It is suggested that the designation of further conservation areas is not a priority for the Council. In common with the processes around Article 4 Directions, the designation and confirmation of CAs is also bureaucratically complex and time consuming. It is also important to note that excessive or unwarranted designation runs the risk of diluting or eroding the specialness of existing areas.
- 7.40. The comprehensive historic coverage of existing conservation areas (medieval to late 19th/early 20th century), make 20th century townscape the most likely future candidate for consideration. In light of this it is notable that areas of 1930's housing in the north of the city have been surveyed (in the last 5-10 years), for their suitability but found wanting in terms of 'specialness', and the survival of original fabric.

### *Recommendation*

- 7.41. In light of these factors it is recommended that the current status quo be continued, and a passive 'holding position' is taken. Proposals will not be actively encouraged, invited or facilitated.

### *Time implications*

- 7.42. Adoption/continuation of this approach would have no time or resource implications

## Conservation Areas - Future Article 4 Directions

### *Current Situation*

7.43. As the table above confirms, of the city's 25 conservation areas, 14 have 'Article 4 Directions'. All of the city's directions are available to view on the City Council's website at:

<https://www.portsmouth.gov.uk/ext/development-and-planning/planning/conservation-areas>

Within these 14 areas a total of 28 Directions have been confirmed. The highest numbers are in areas where higher concentrations of single family housing can be found. Historically, the Authority made a significant effort to ensure that where appropriate Article 4 directions were made and confirmed. This effort has ensured that prescribed works to properties within CAs have been brought under planning control.

7.44. The numerical, geographical and percentage coverage afforded by these Directions is high (Amongst the highest in fact of any Planning Authority in the Hampshire area). This is a legacy of a concerted and successful effort to protect areas by establishing control, and it ensures that where necessary the city's conservation areas currently enjoy coverage that is more than satisfactory.

### *Going forward*

7.45. The designation and conformation of new Article 4 Directions is time consuming, bureaucratically complex, and contingent on lengthy public consultation. It is also notable that there has been no external demand for such measures in recent years. In and of themselves these factors do not negate the need for, or appropriateness of, fresh designations, and the adoption of further Article 4 Directions in the future cannot of course be ruled out. In the context however of a comprehensive review such as this, these factors (in combination with the very high level of existing coverage) do suggest that it should be a very low priority

### *Recommendation*

7.46. In light of these factors it is suggested that the LPA do not take a pro-active approach to the adoption of further directions. Proposals will not be actively encouraged or invited by third parties, and where they are forthcoming, (at the suggestion for example of an elected member), they would be considered/recommended only after careful survey, a balanced analysis of need and resource implications and on genuine merit.

### *Time implications*

7.47. Adoption/continuation of this approach would have no time or resource implications

## 8. Local List

### Background - What is the 'Local List'?

- 8.1. The Local List is a list of "*buildings, monuments, or sites.....identified by Local Planning Authorities (LPAs), as having a degree of significance meriting consideration in planning decisions but which are not formally designated*". Inclusion on the list highlights that the building or structure is considered by the LPA to be of local (rather than national) historic and/or architectural interest. It alerts the LPA, owners/ occupiers and third parties that this is the case.



Figure 7 - The Registry

### What are the implications of inclusion on the 'Local List'?

- 8.2. Inclusion of a building on a local list does not have any immediate effect in law. It does not lead to any changes to permitted development (PD) rights relating to its alteration or extension, (which apply just as they do to any other unlisted building). (*Mynors 5th Edn (2017) (7-017 p.203)*)
- 8.3. Unless the locally listed asset is located within a conservation area, express planning permission is not required for its demolition (total removal). An application for prior approval which is limited to addressing details of the method of demolition and subsequent restoration of the land is however required. The absence of formal (or 'statutory') designation means that Listed Building Consent (LBC) is also not required for works to a locally listed building. Notwithstanding this, where works to a building on the local list would require planning permission inclusion is a material consideration in determining any application. Inclusion should also encourage and support the retention/reuse of the building.

### Current Situation

- 8.4. Portsmouth has had a 'list of local buildings of special architectural and historic interest' ('Local List') since March 2003. The chronology below outlines the adoption process for the list:
- 22.06.01 Draft list of proposed assets approved under Members Information Service (MIS) Item 11 of Issue 25.
  - Local list formally adopted at a meeting of the Planning, Regeneration and Economic Development (PRED) committee on the 21st March 2003 (21.03.03)
  - Local List publication booklet last updated (without addition) December 2011.

- 8.5. Since this time it has been updated (once) in 2011. This removed a limited number of buildings due to demolition (5) or statutory listing (4). No further locally listed assets have been demolished or listed since that time, nor have any new buildings or structures been added to or removed from the list since this date. The current (2011) version of the Local List is available as a PDF on the Council's website at: <https://www.portsmouth.gov.uk/ext/documents-external/pln-planning-conservation-buildings-of-historic-interest.pdf>

At the time of its adoption, the list was ratified at the appropriate level within the Authority. This has secured its use as a material consideration in decision making, (including in appeal situations). The Council has not considered it necessary to adopt it as a Supplementary Planning Document (SPD).

#### Relevant national policy/guidance

- 8.6. The NPPF includes locally listed structures in the definition of 'undesigned' heritage assets. It also makes clear that "work in designating and taking decisions related to local heritage lists should be no more than is necessary" (para 197)
- 8.7. Practice around local lists is also supported by Planning Policy Guidance (PPG) (Para: 39 last updated 23.07.19). The advice offered by the PPG is very broadly focussed, but it does make clear that: "Local planning authorities may identify non-designated heritage assets. These are buildings, monuments, sites, places, areas or landscapes identified as having a degree of significance meriting consideration in planning decisions but which are not formally designated heritage assets. In some areas, local authorities identify some non-designated heritage assets as 'locally listed'....."*A substantial majority of buildings have little or no heritage significance and thus do not constitute heritage assets. Only a minority have enough heritage interest for their significance to be a material consideration in the planning process.*"

#### Historic England Advice Note No.7

- 8.8. Historic England also have an Advice Note (No.7) 'Local Heritage Listing' (last updated May 2016) related to this area of conservation practice. This note acknowledges the need for flexibility and local responsiveness around the initiation and management of a local list. It also clarifies that decisions on the ways in which assets are identified, and the system adopted for managing a local list, are matters for local planning authorities. The advice it offers focusses to a large extent on methods for setting up and managing a list (rather than reviewing or changing an existing list).

#### Going Forward

- 8.9. The local list contributes to the Authority's 'positive strategy for the conservation and enjoyment of the historic environment' Both the identification of the assets and the weight they are afforded in the DM decision making process help the Council to deliver better, more 'conservation centric' decision making.

## Policy in the new Local Plan

- 8.10. HE guidance note 7 asserts that "Where a local list exists, it is good practice to have a relevant policy in the Local Plan which explains how assets on the list will be dealt with". It is intended that the revised conservation and design policy currently under consideration for the new local plan, address development relating not only to designated, but also explicitly to un-designated heritage assets. For this reason, an individual policy that focusses exclusively on development impacts and locally listed assets would essentially replicate the content and approach of this more widely framed policy solution, and is therefore considered unnecessary.
- 8.11. A comprehensively framed policy would of course be the subject of normal local plan objection procedure, and if included and adopted would be afforded considerable weight when making decisions about development affecting locally listed (and other non-designated) assets.
- 8.12. The Council has already thoroughly assessed and identified a comprehensive list of local assets, based on an extensive list of criteria published in the local list. It has also ratified and published this in full online. Notwithstanding this, as has already been noted it was last reviewed in 2011, and is also silent on the matter of how existing or new assets should be removed or added to the list.
- 8.13. Having regard to current experience and practice, (which has shown this to be an area of very limited stakeholder interest), and the competing demands of other objectives identified in this paper, a continuation of the 'status quo' is not considered untenable. Such an approach is not however indicative of 'best practice', and in the longer term (3-5 years) would realistically require attention.
- 8.14. In this context the Local Plan process presents an opportunity to consider how an update to the list could be progressed. The key areas of focus in this regard have already been identified and must be considered a review of the local list and addressing how existing or new assets should be removed/added to the local list.
- 8.15. The process of reviewing/updating the local list can be addressed ostensibly in one of two ways, either a comprehensive 'proactive' approach is taken, or a more responsive 're-active' solution is adopted. (Either approach will of course have different process, and time/resource implications associated with it).

## Option 1 - A proactive approach

- 8.16. Implies a systematic review of the existing buildings /structures on the list (possibly including a site visit to re-assess their condition). Associated with this would be a comprehensive 're-survey' of the city (perhaps along thematic lines) to seek to identify potential new assets for inclusion. Consideration could also be given to whether previously ignored categories of asset should be eligible, and what criteria they should meet. It is possible that this approach could be served by new technology. Other Planning Authorities (notably Wandsworth) have for example facilitated reviews using IT/web based systems such 'Placecheck', as tools for identifying buildings to potentially add to their local list.

## Option 2 - A re-active approach

- 8.17. Would be less 'expansive' in its aims, accepting that the original approach taken to the selection of assets and the list's current scope are broadly satisfactory. This approach would also accept that a thorough 'snapshot' re-appraisal of the condition of individual assets would not take place on a systematic basis. This does not mean however that the Authority would necessarily be unaware of change to these assets or be prevented from having regard to this in any decision-making process (The Council does for example hold a comprehensive photographic record of the assets at the time of their inclusion on the local list). Rather than embarking on a wholesale review it would be more limited and passive, relying on a 'desk based' analysis of existing assets, and on third parties/stakeholders coming forward with suggestions (nominations) for additions, that would then be assessed against published criteria.

## Addressing the nomination of assets

- 8.18. Either approach requires that a mechanism be made available for third parties to nominate buildings for inclusion on the local list. It is suggested that this would be most effectively achieved by creating a page on the City Council's website. The page should provide a link to a short nomination form and email address to send it to. As a preliminary to the assessment process, the form should ask the nominee to provide the address of the nominated property, and their own contact details and invite them to make their own evaluation against some (or all) of the nomination criteria. (Any form should also clarify that anonymous nominations will not be accepted).

Associated with this exercise would be other work to:

- Consider the existing criteria for inclusion and where necessary 'tweak', adapt/enlarge and agree any changes of approach in preparation for their publication on the webpage.
- Establish and publish which individual(s) and or body would have responsibility for assessing any nomination(s). This typically lies with the Head of Service/Conservation Officer or wider LPA, Its scope could however be extended to third parties, (such as for example an independently constituted panel).
- Identify and publish when assessment(s) would be made. This would either be on an ad hoc basis in response to nominations received, or at fixed points in a year, and how and when any applicant or property owner would be notified of any nomination and decision.
- Establish whether member consideration and/or formal ratification at either a chair or committee level is necessary in relation to:
  - Any procedures or the conferment (delegation) of any powers associated with the nomination and assessment processes
  - Acceptance of inclusion of a building on the list

## Recommendation

- 8.19. It should firstly be re-iterated that the case for continuance of the status quo erodes as time goes on.

Of the two approaches discussed option 2 (taking a 're-active' approach to review) is recommended as the most appropriate course of action. It is considered to offer a more balanced fit within the context of the range of competing objectives highlighted by this topic paper. Notwithstanding this, this approach also responds to clear instruction in the NPPF (para 197) that "*work in designating and taking decisions related to local heritage lists should be no more than is necessary*" (para 192) Although more restrained in its approach than wholesale review of the list, it would still offer a strong positive in establishing and opening up a process of nomination, and setting the local list on a revised and updated footing.

### Time implications

- 8.20. Ascribing a precise timescale to this task is not straightforward, nevertheless undertaken as a dedicated task by a single individual without the interruption of other workstreams or priorities, it is estimated that the process of (desk top) reviewing the existing assets/document, altering the existing criteria for inclusion on the list, establishing how, and when additions could be made and securing adoption of a refreshed document could take from 3-5 months, (significantly longer if a more proactive approach to review is taken).

## 9. Heritage at Risk and Heritage Strategy

### Background

#### What is Heritage at Risk?

9.1. Heritage at Risk is a programme initiated by Historic England in the late 1990s to help protect and manage certain classes of designated heritage asset. It identifies (using a checklist of published criteria), those sites that are considered by HE to be most at risk of being lost as a result of neglect, decay or inappropriate development. These assets are entered on an 'At Risk Register' that is maintained and 'dynamically' updated by HE on an annual basis. It is used by them to raise awareness around their condition, and to engage with stakeholders around identifying positive solutions for the assets on the register.

#### The scope of the HE 'At Risk' register

9.2. The scope of the HE register extends to: Places of worship, Archaeological sites, Conservation areas, Registered parks and gardens and Protected wreck sites. It has always covered listed (but not scheduled) buildings and structures, but only those listed at grade I and II\*, (the most significant and least common grades). With the exception of places of worship, those listed at grade II are not covered by the list.

#### Current Portsmouth Entries

9.3. The City of Portsmouth has 15 entries on the 2020 register. This represents a modest decrease on previous years. A majority of the sites are 'Category C' which are those sites in 'Slow decay; no solution agreed. Only two sites are in 'Category A' the most at risk category.

#### An 'At Risk' register for Portsmouth

9.4. The exclusion of Grade II buildings from the HE register of course leaves this class of asset unrepresented. Historic England encourage Local Authorities to produce their own at-risk registers for this, and other classes of asset (including locally listed assets and conservation areas). Such a document would not only complement the EH register, broadening the scope of assets identified at risk, but also offers the scope to feed into and inform the identification of assets for regeneration/enhancement through a 'heritage strategy' (discussed in more detail below).

#### Current Situation

9.5. Portsmouth does not currently possess its own adopted 'at risk' register. Historically a survey of potential assets for a register was undertaken, criteria for inclusion on a list developed, and a list drafted. This document was not however taken forward for adoption. The work around this document remains valid and could therefore serve as the basis of a revived register for the city. Before being progressed however it would require a major review of the assets included and a subsequent update of inclusion criteria/content.

## Recommendation

- 9.6. As has already been noted a local register offers scope to feed in to a wider Heritage Strategy for the city. For this reason reviewing, updating and securing the adoption of a register for Portsmouth is considered desirable, and represents an ‘intermediate’ priority for the Authority. (It is also recommended that control over the nomination or inclusion of any asset on a revived list remain exclusively at the discretion of the Planning Authority, rather than being opened up to any third party).

## Time implications

- 9.7. Undertaken as a dedicated task by a single individual without the interruption of other workstreams or priorities, it is estimated that the process of (re)drafting a local list for the city including resurveying assets for potential inclusion, reviewing criteria for inclusion on the register consulting and securing adoption could take from 4-6 months.

## A ‘Heritage Strategy’ for Portsmouth

### Background

#### What is a Heritage Strategy?

- 9.8. A heritage strategy is an overarching ‘strategic’ document whose purpose is to identify and clearly understand the significance, value and potential of heritage assets in an area, and in particular how their special character could contribute to the future of the area. They typically provide advice and guidance for the management of assets, focussing especially on the identification of places (often those ‘at risk’ or in need of enhancement) that can play a role in the future development and regeneration of a place.
- 9.9. They can also focus on the development of policies, approaches and actions for decision making around the prioritisation and progression of sites. In so doing, they can be used to help support future external funding bids with third party agencies (such as the Heritage Lottery Fund, Architectural Heritage Fund, Historic England, or Big Lottery), helping Authorities to achieve their objectives for the protection and enhancement of the historic environment. Good examples of award winning heritage strategies nationally include those for Dover District Council (adopted 2013), Nottingham City Council (adopted 2016).

#### Current situation

- 9.10. A draft strategy has been prepared which was given Cabinet approval for consultation in July 2021. The Strategy sets out a vision for heritage in Portsmouth and identifies some key themes for future working in the city around this, also highlighting some projects that can be taken forward to support this. The draft has been prepared in consultation with Historic England as a key stakeholder for heritage in the city. A final Strategy is expected to be prepared following the consultation before the end of 2021.

## Recommendation

9.11. The role of a Heritage Strategy in helping to secure improved prospects for at risk and underutilised assets and in meeting the Authority's (and Council's) wider corporate objectives around regeneration is potentially significant. For this reason, progressing a strategy is considered both desirable and a high priority for the Authority.

## 10. Heritage and Public Realm

### Current Situation

- 10.1. The selection and maintenance of appropriate materials, and street furniture in public areas plays a key role in sustaining the significance of the city's historic areas (conservation areas, scheduled monuments, registered parks, listed buildings etc) In order to help secure the most appropriate outcomes in this regard, in 2001 the City Council published '*Roads and Street Furniture in Historic Areas*', a policy/guidance document that was intended to set out and formalise the Authority's approach to practice in respect of the retention of existing historic material and new work. It sets out for example standards that are expected in relation to paving (and kerbs), road surfacing/markings, lighting, street signs, street furniture, and traffic calming measures. The publication was last updated in 2010.
- 10.2. The age of the document, date of its last review, and evolution of the Council's relationship with its current highways contractor indicate that a re-examination of its content and approach are not unreasonable. Work around this issue, in the form of a 'Public Realm Strategy' for the city, was commenced and drafted to completion, but ultimately not progressed to adoption. The content of the Roads and Street Furniture Document was condensed, adapted (its wording strengthened), and then subsequently integrated into a draft of this wider strategy around public realm.

### Recommendation

- 10.3. At present, progress around this issue therefore remains wedded to the status and progress of the public realm strategy. If this wider and more complex piece of work is not brought forward, then it is considered that a fresh standalone review and update of the existing document should take place. By comparison with some of the other priorities identified here updating the existing document is considered to be a relatively straightforward task. Notwithstanding this it is considered to be a low to intermediate priority in the context of the range of tasks considered in this document.

### Time implications

- 10.4. Undertaken as a dedicated task by a single individual without the interruption of other work streams or priorities, it is estimated that the process of reviewing updating, and (re)drafting a heritage strategy for the city and engaging with stakeholders and securing its adoption would take at least 6 months. (Potentially significantly longer)

# 11. Management of the Council's Heritage Assets

## Background

11.1. The City Council is the freehold (or leasehold) owner of a range of designated and undesignated heritage assets in the city. In order to have a full and up to date understanding of the extent and nature of the assets within its estate, the Council recently undertook a comprehensive interrogation of its own property database. This confirmed that the Authority is responsible for the management of 80 assets. These include not only buildings, but also street furniture and other structures such as monuments and memorials. Understanding the condition, value and potential of these assets should be the basis of rational decision making about their management, use, alteration or disposal. This understanding in turn highlights the opportunities for, and constraints around change.

## Current situation

11.2. Responsibility for the management of the great majority of the City Council's own assets rests either with its Asset Management/City Development or Housing Services. Works to these assets that are frequently proposed or undertaken include small scale maintenance and development (alterations/ extensions). Less frequently proposals whose scope is more significant such as the disposal of assets or larger scale (re)development works (sitting within a wider regeneration agenda), are also proposed.

11.3. These currently take place within the context of an internal exchange of advice and guidance between the Planning Service and other relevant departments, and where they subsequently progress (and are necessary) through the Development Management process (supported by relevant legislation, national and local policy). Whilst this process is effective, formal written guidance setting out the responsibilities, objectives and characteristics of a heritage centric approach to the Council's management of its own assets is at present absent.

## Recommendation

11.4. In light of this it is suggested that consideration be given to negotiating, drafting and adopting guidance to aid relevant departments of the Council in the sympathetic and appropriate management of the city's heritage assets. This should champion quality in the care of inherited assets and around new construction needs. It should also set a good example. The credibility of the Council's role as a steward of its own assets, (and as a regulator of change to other's historic buildings) requires the Authority to demonstrably achieve the standards it expects of others. (This applies particularly to buildings of civic importance).

11.5. Ideally it would also acknowledge the need for, and set out minimum requirements around planned maintenance and repair programmes, based on regular (at least quinquennial) inspections and condition reports. Where the disposal of an asset is

under consideration, it should clearly set out that the overriding aim of disposal will be to secure an optimal end use(r), (rather necessarily than the highest price). Although desirable, this task is considered to have a low priority in the context of the range of tasks discussed in this paper.

### Time implications

- 11.6. Undertaken as a dedicated task by a single individual without the interruption of other work streams or priorities, it is estimated that the process of drafting relevant guidance would take 6-8 weeks.

## Appendix A. Local Plan Issues and Options Consultation 2018 LPA response to Historic England feedback

### Introduction

As part of the city's Local Plan Review, an issues and options consultation exercise was undertaken in August 2017, stakeholders were asked about the Council's approach to the conservation and enhancement of the city's heritage assets. A range of views were expressed, The response provided by Historic England (HE) was comprehensive, (addressing all of the key points and issues raised by other respondents), and identifying the following matters for the plan review process to consider:

*The gathering of evidence in a heritage topic paper.*

A comprehensive and carefully considered heritage topic paper has been prepared.

*HE expressed concern at the absence of heritage studies, and posed a number of questions around the Council's evidence in relation to the historic environment: Is there an extensive urban survey (EAS)? Is there an urban archaeological database (UAD)? Is there a list of locally important heritage assets? Has the Council undertaken a survey of grade II buildings at risk? It was suggested that if the evidence base for the historic environment is weak, the Council may need to commission proportionate research in the form of a : Historic characterisation visual impact assessments, and /or archaeological assessments*

The Historic England website identifies a number of approaches to historic characterisation in urban areas, including those mentioned in HE's issues and options response: 'Extensive Urban Survey' (EAS) and 'Urban Archaeological Databases' (UADs). Their website clarifies that EUS is a: "county-by-county survey of the smaller towns of England. They are carried out by local authority historic environment services, with funding from Historic England". It also makes clear that UADs are a form of: " Detailed Historic Environment Record coverage, carried out in about 30 selected historic towns and cities which have rich and complex below-ground archaeology".

Portsmouth has neither an EUS nor a UAD. It does however have an up to date Historic Environment Record (HER), alongside 22 Conservation Area Appraisal and Guideline documents, a list of locally important assets, and an Urban Characterisation Study (which addresses the historic environment in depth). All of these documents have been adopted/published and are available on the City Council's website. A survey of grade II listed buildings at risk has also been prepared (but is currently not published). The topic paper acknowledges that these documents (including the Urban Characterisation Study) would benefit from review/updating. Notwithstanding this, the Council's evidence base for the Historic Environment is not weak. It is considered sufficient and satisfactory for the review and preparation of a new local plan for the city.

*Securing the historic environment's role in the delivery of the Plan's economic, social and environmental objectives may require consideration of the relationship between the plan's heritage objectives and its engagement with issues such as : The vitality of town centres, Promoting sustainable transport, Delivering a choice of homes, and Requiring good design.*

Engagement with these issues is likely to be necessary through the Local Plan process. A limited number of the city's lower tier retail areas are (at least partially) located in

conservation areas, many were heavily impacted by war damage, and none is richly endowed with heritage assets. For this reason none can be considered of comparable significance to nearby and better surviving historic centres such as Chichester or Winchester. Identifying and taking forward opportunities for centres that do enjoy historic value is perhaps best achieved through a heritage strategy (which this paper identifies as a priority), and the pursuit of other measures such as bids for external funding, (an objective of the Council), supported by a newly appointed bid manager.

The City Council recently successfully completed the redesign and reconstruction of the multimodal Hard Interchange located in the HM Naval Base Conservation Area, The city's main station 'Portsmouth & Southsea' is also a grade II listed building, beyond these two sites there are no further assets directly linked to the city's sustainable transport network. Outside of these sites it is difficult to see how heritage assets can directly support its promotion. In contrast, assets can contribute to the delivery and quality of housing choice, most obviously through sympathetic conversion. In order to understand the scope and interaction of heritage assets and possible housing sites, the Council, through its 'HELAA' process has undertaken a 'sieve' mapping exercise, overlaying heritage assets and possible future development sites, and in so doing, contributing to its understanding of capacity and density in response to the historic built environment.

Requiring good design will be addressed through the revision and enhancement of the DM policy relating to design and conservation in the plan.

*In the formulation of strategy HE also advise consideration of the following:*

*How the plan will address heritage at risk, and the re-use of buildings.*

*The relationship between conservation/heritage assets and Green Infrastructure (GI). How development around and/or within heritage assets might better reveal their character and significance. How the Historic Environment Record (HER) might assist in identifying and managing the conservation of non-designated heritage assets. What implementation partners need to be identified.*

As has been noted, the Authority intends to address heritage at risk and the re-use of buildings through a heritage strategy.

The mutually beneficial relationship between heritage assets and GI is discussed in more detail in the Council's GI background paper. This paper acknowledges that a limited but important number of the city's green open spaces are also designated heritage assets (most notably the Hilsea Lines and Southsea Common). Their protection and enhancement helps not only to secure positive heritage outcomes, but serves as an added draw in achieving other health/multi-functional benefits as well.

Development around and/or within assets that might better reveal their character and significance will be addressed through the revision and enhancement of the DM policy relating to design and conservation in the plan, which as in the past will address not only the impact of proposals on the fabric, but also on the setting of assets (including conservation areas).

As has already been noted The Council has a local list, as such the management of undesignated assets (at this level) is fully integrated into the development management process. The HER may however assist in identifying other undesignated assets. In light of

this consultation/analysis of the register should take as part of any work to review/ update the Local List. (A task which been identified as a priority in the topic paper).

It is considered that the identification of implementation partners is necessary. This will come through the engagement process(es) necessary to take forward a number of the key tasks identified in the paper (such as a heritage at risk strategy, and heritage and public realm).

*They were also clear that an effective strategy for conservation requires relevant heritage specific Development Management (DM) policies. (This should include a policy or policies for assessing the potential impact of development proposals on the significance of assets). These policies should set out what is required of applicants in terms of: Describing the significance of assets, and assessing the impact of a proposal on that significance.*

It is proposed that the existing unified design and conservation policy in the current plan be reviewed and enhanced to ensure that the articulation and assessment of significance/ impact are given the appropriate weight. The Council's 'local list' application submission requirements have also been recently updated to make clear (in line with guidance in the NPPF) that in addition to submitting a heritage statement where required, the Authority expects applicants to consult the local HER.

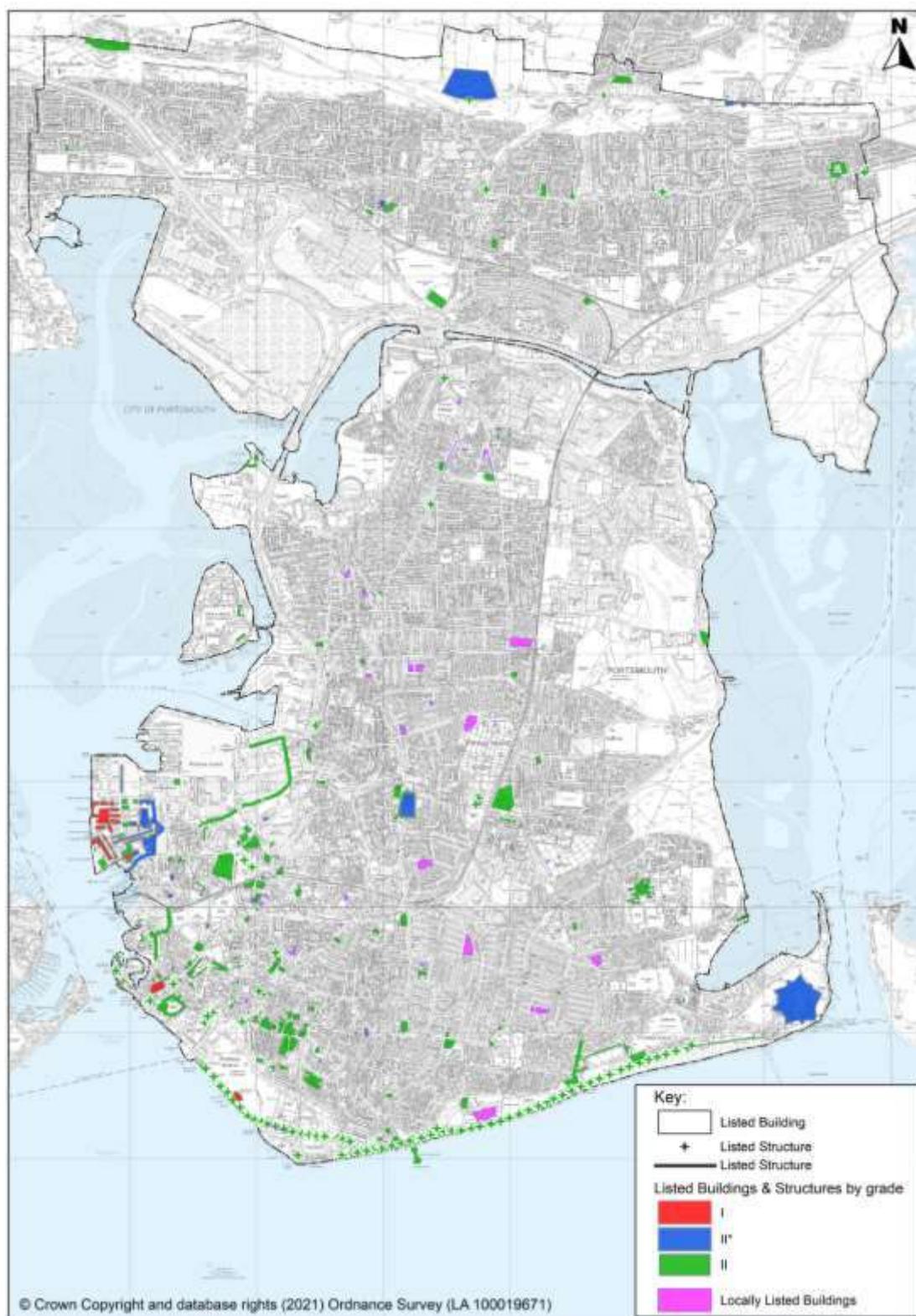
*HE also suggested that a policy that specifically addresses assets at risk and their enhancement is included within the plan with the following wording recommended for such a policy: "The Council will monitor buildings or other heritage assets at risk through neglect, decay or other threats, proactively seeking solutions for assets at risk through discussions with owners and willingness to consider positively development schemes that would ensure the repair and maintenance of the asset, and, as a last resort, using its statutory powers".*

As suggested, it is intended that a policy specifically addressing assets at risk and their enhancement will be included in the Local Plan. Its wording is adapted from that suggested by Historic England (above).

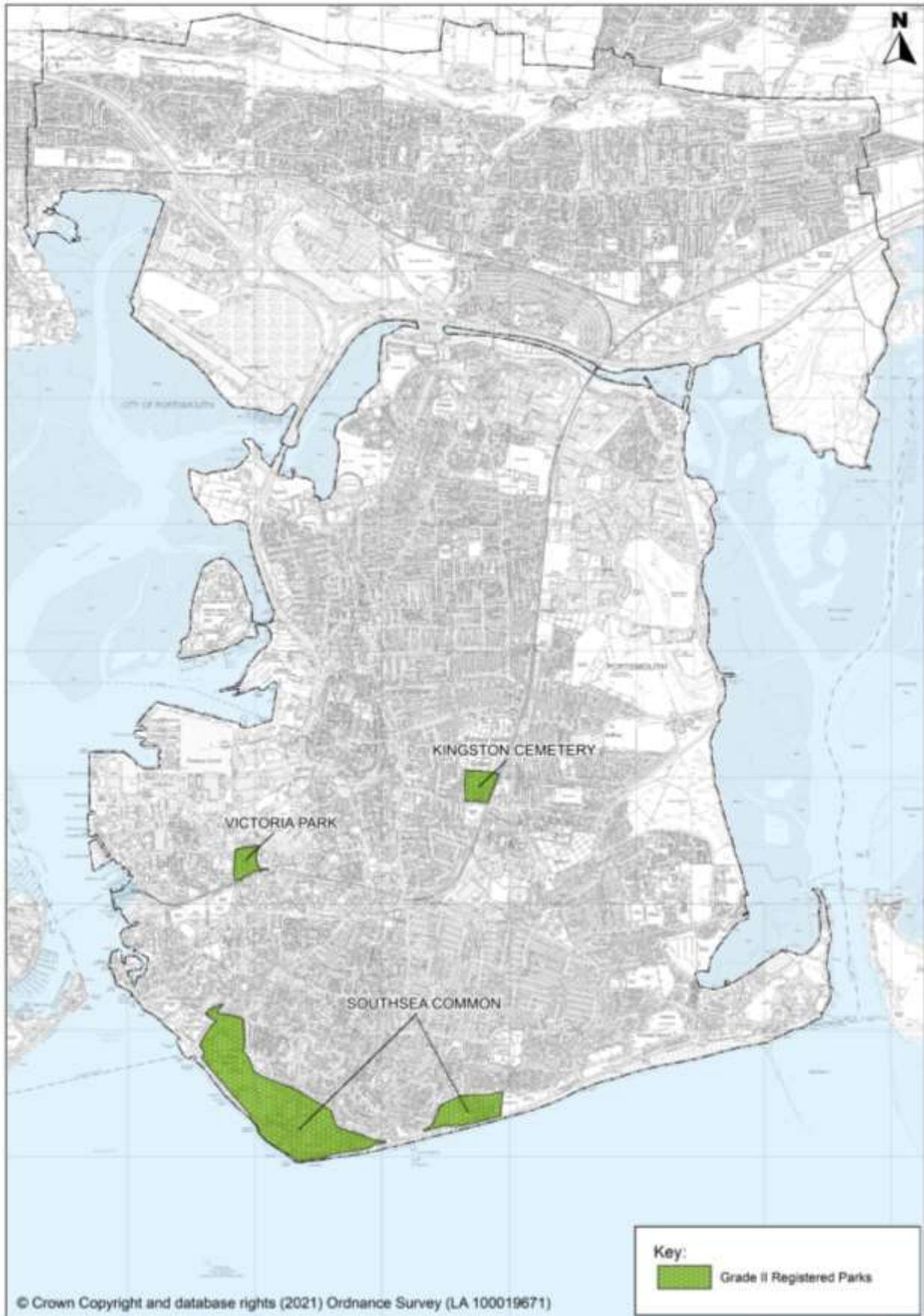
*HE also indicated that they expect the council to demonstrate how the historic environment has influenced its choice of sites, and to set out detailed overriding justification if it proposes the allocation of any sites that would have an adverse impact on assets. They also expect the Council to acknowledge that 16 designated heritage assets are on the Historic England At Risk Register.*

As has previously been noted, in order to understand the scope and interaction of heritage assets and possible development sites, the Council, through its 'HELAAR' process has undertaken a 'sieve' mapping exercise, overlaying heritage assets and possible future development sites. This process has identified a modest number of significant sites (in particular the grade II listed St James's Hospital, and Tipner sites) where development has the scope to impact on heritage assets. The justification for allocation of these sites has been influenced not only by their heritage status, but also their capacity to meet the city's housing/growth needs. The impact of any scheme on these assets will be addressed through the Development Management process and relevant legislation and national/local planning policy. Where it is considered necessary it will also be supported by the provision of appropriate site specific briefs, and through the inclusion of relevant sites in other supporting policy documents such as SPD's. The Council acknowledges that Portsmouth has 16 designated assets on the HE at risk register.

## Appendix B. Statutory & Locally Listed Buildings within Portsmouth



## Appendix C. Registered Parks and Gardens within Portsmouth



## Appendix D. Scheduled Ancient Monuments within Portsmouth

