

Decision Maker: Ian Maguire - Assistant Director of Planning and Economic Development (delegated decision)

Date of decision: 5 February 2026

Subject: Nomination for the Former Portsmouth City Records Office, Museum Road, Southsea to be placed on the Register of Assets of Community Value

Report by: Tom Bell - Principal Planning Officer

Wards affected: St Thomas

Key decision: No

Full Council decision: No

1. Purpose of report

- 1.1 The Council received an Asset of Community Value (ACV) nomination in relation to the Former Portsmouth City Records Office, Museum Road, on 5th December 2025. Further details were requested which were submitted to the Council's satisfaction by 12th December 2025.
- 1.2 The application is determined against the Localism Act 2011, guidance set out in the Assets of Community Value: Policy Statement (2011) and the Council's Policy for Defining Social Interests / Well-being for determining ACV nominations.
- 1.3 The purpose of this report is to make a recommendation to the Assistant Director of Planning and Economic Development in respect of the determination of the nomination of the Former Records Office as an ACV. The determining criteria are set out in section 88 of the Localism Act and section 5.1 of this report. Consideration is also given to the Government's Assets of Community Value: Policy Statement (2011) (as set out in section 5.2 of this report).

2 Background

- 2.1 This application for entry onto the Council's list of ACVs has been submitted by the Sustainable Conservation Trust (SCT), which meets the eligibility requirement as a 'not for profit organisation - company limited by guarantee which does not distribute any surplus to its members'. The Council has checked the SCT's status on the Companies House website.
- 2.2 The Former Records Office is located on Museum Road, which is within St Thomas ward and within the Council's administrative area. The Former Records Office is

owned by Portsmouth City Council (PCC) and is currently the responsibility of the Housing Department.

- 2.3 The Council (Planning) acknowledges that the implications of a decision to place land or buildings on its list of ACVs could represent an interference with the Owner's right to the enjoyment of property under Article 1 to the First Protocol of the European Convention on Human Rights, as incorporated into domestic law by the Human Rights Act 1998. To that end, the Council and indeed the statutory framework of the Localism Act 2011 (and secondary legislation) recognise that such interference must be balanced against the public interest, any interference must be proportionate, and that interference may warrant a claim for compensation by the Owner against the Council.
- 2.4 The consideration of the Former Records Office is on its merit as a potential ACV. This is separate from any consideration of the building's architectural and heritage value and is not influenced by the City Council's proposals for the building as landowner.

3 History of the Building

- 3.1 The Former Records Office building is located adjacent to the Portsmouth Museum & Art Gallery and was home to the regimental institute (part of Victoria Barracks, now demolished). The building is thought to have been built in 1898 and designed by the War Office to be in keeping with the surrounding buildings, which were all designed by Lieutenant-Colonel R N Dawson-Scott. It became the Records Office in the mid-1970s.
- 3.2 In 2011, the Records Office was moved to Portsmouth Central Library to make up what is now the History Centre. In June 2021, Historic England undertook a survey of the site to ascertain whether it had special historical or architectural status. The building was found to not have the requisite special architectural or historic interest in the national context to recommend it for listing. The building has been vacant since 2011 and has not been in ancillary use to the Portsmouth Museum.

The History of the Archive Service

- 3.3 The City's archives have been held in several locations including the Old Town House on the High Street in Old Portsmouth and the Gaol on Penny Street before being transferred to the Guildhall. The records survived the bombing of the Guildhall in 1941. The Portsmouth City Record Office was established in 1960 in the rebuilt Guildhall. It moved to a site in Museum Road in 1976. In June 2011 the Record Office merged with the Local Studies section at Central Library to form Portsmouth History Centre.

Condition of the Building

- 3.4 A condition survey was undertaken in 2021 to look at the cost to upkeep and maintain the building. The condition survey revealed that costs to perform remedial works were in the region of £2 million, with conversion to a museum in the region of £2.5 million. Costs to demolish the building were considered at the time of survey to be in the region of £300k.
- 3.5 The location of the building contributes to its current condition, as it is located on the site of the former city moat where subsidence has created rotation of the external walls and substantial cracking along the masonry, so much so that the south gable has been propped up by scaffolding.

4 Summary of the submission

- 4.1 The SCT submitted its application setting out arguments in favour of the Former Records Office being listed as an ACV. The application included:
- A nomination letter
 - An ACV nomination form
 - Illustrations and Concepts document for the City Records Office by Ashik Kanani for SCT
 - A red line plan confirming the site's red line boundary
 - A document titled the Uniqueness of Portsmouth detailing the importance of the City's Cultural Heritage
 - An outline Suitability Appraisal by The Visitor Attraction Consultants (TVAC).
 - Confirmation email stating that the SCT is a not-for-profit organisation - company limited by guarantee which does not distribute any surplus.
- 4.2 Separately on 20th January 2026 a letter of support was received from Stephen Morgan MP, this letter highlighted the following:
- The historic and civic importance of the Former Records Offices to the City.
 - Support for the reuse of the Former Records Office as a community hub and the SCT's proposals citing their community benefits.
 - That the listing of the records office as an ACV provides an opportunity to safeguard the building for the local community.
 - That the SCT's proposals align with the wider City of Culture bid that the City is currently preparing.
 - That the project the SCT is proposing demonstrates Portsmouth's commitment to protecting and investing in the spaces that give our city its character, cultural depth, and creative capacity and strengthens the narrative of community-led cultural development.

Summary of the owners' comments

- 4.3 The site is owned by PCC and falls under the responsibility of the PCC Housing department. PCC Housing have submitted a response to the application for listing. The key points raised are as follows:
- The Former Records Office has been closed since 2011 and there has been no public access to the building or grounds for 15 years.
 - Prior to 2011 when the records office was in use, public access was limited to a search room with no public access to the wider building.
 - The work of the Former Records Offices has been relocated to the Central Library so there is no loss of social value.
 - The applicant has not demonstrated the viability of the proposed reuse.
 - A 2011 condition survey by Faithful and Gould indicated that the estimated costs to repair the building to a useable condition was at that time £2.03m (maintaining the existing layout) rising to £2.498m to adapt the building for museum use.
 - That the applicant had not previously approached the Council to discuss its proposals, sought access to the building or engaged with the Council to understand its condition or suitability.
 - That a 2020 community consultation undertaken by the Council indicated that 54% of respondents indicated support for housing development being a suitable use for the building.
 - That the building has been reviewed under the Council's Heritage Strategy and by Historic England. This review concluded that, due to adaptations and extensions over time, the building's architectural merit is limited, and it does not warrant listing.

5 Should the Records Office be listed as an Asset of Community Value?

- 5.1 The main legislative tests the nomination must pass are set out in Section 88 of the Localism Act 2011. The Council as LPA has reviewed the evidence of the applicant SCT, and in light of the Council officer's visit to the site to erect signage, the Council forms the view that ss.88(1)-and (2) must be considered:

- (1) For the purposes of this chapter but subject to regulations under subsection (3), a building or other land in a local authority's area is land of community value if in the opinion of the authority—

(a) an actual current use of the building or other land that is not an ancillary use furthers the social wellbeing or social interests of the local community, and

(b) it is realistic to think that there can continue to be non-ancillary use of the building or other land which will further (whether or not in the same way) the social wellbeing or social interests of the local community.

(2) For the purposes of this Chapter but subject to regulations under subsection (3), a building or other land in a local authority's area that is not land of community value as a result of subsection (1) is land of community value if in the opinion of the local authority—

- (a) there is a time in the recent past when an actual use of the building or other land that was not an ancillary use furthered the social wellbeing or interests of the local community, and
- (b) it is realistic to think that there is a time in the next five years when there could be non-ancillary use of the building or other land that would further (whether or not in the same way as before) the social wellbeing or social interests of the local community.

5.2 Further guidance is set out in the Government's Assets of Community Value: Policy Statement (2011), which states that a building or other land should be considered an ACV if:

- its actual current use furthers the social wellbeing and interests of the local community, or a use in the recent past has done so; and
- that use is not an ancillary one; and
- for land in current community use it is realistic to think that there will continue to be a use which furthers social wellbeing and interests, or for land in community use in the recent past it is realistic to think that there will be community use within the next 5 years (in either case, whether or not that use is exactly the same as the present or past); and
- it does not fall within one of the exemptions.

5.3 The City Council's policy for defining social interests / well-being states that, when assessing nominations for inclusion on the Register of Assets of Community Value the City Council will have regard to the following criteria:

1. The extent to which the approval of the nominated site would enhance the social interests and social wellbeing of the local community because in its absence the local community would be deprived of land or a building that is essential to the special character of the local area, and provides:

- i. a place to meet and socialise, or
- ii. a place to shop, or
- iii. a recreational, sporting or cultural facility.

2. The definition of the extent of the local community will depend on the nature of the use and each case will be considered on its merits, with particular reference to the character and heritage of the local area, its community cohesion and its sense of belonging.

3. The City Council will have regard to the realistic prospect of the continued or resumed use of the asset within the next five years, and in particular and where it is a matter relevant to that use, the commercial viability of the proposal (including the ability to raise funds) and the sustainability of that use.

5.4 This report considers the points set out in these guidance documents:

Was there a time in the recent past when the actual use of the Former City Records Office furthered the social wellbeing and interests of the local community?

- 5.5 The former records office has been vacant since 2011 when the Former Records Office merged with the Local Studies section at Central Library to form the Portsmouth History Centre¹. The SCT argue in their application that 'as the city's records office from 1976 until 2011, it [the records office] served thousands of residents, researchers, families, and students. It preserved, interpreted, and shared the stories that form the foundation of our city's identity'. Whilst it is undoubtedly true that that the site had a function as an important community value for the City as a whole (the whole City would be considered the community in the case of the Former Records Office), that function has been operating as part of the Local History Centre on the second floor of the Central Library for the last 14 years. The Records Office function is not inherently tied to the Former Records Office building (or any other building) as evidenced by its different homes over the course of its existence.

The Former Records Office building is currently vacant and has been for the last 14 years with no prospect of return to its former use. The ACV regulations refer to the building having been in use in the recent past when considering the social wellbeing and interests of the local community. However, the regulations do not define 'recent past' and leave it up to the Council to decide. It is considered that 14 years is a considerable amount of time to have elapsed and it is the Council's opinion that 14 years ago does not constitute recent past.

Is the Former Records Office ancillary to another use?

- 5.6 No. Although the Former Records Office is subservient in an architectural sense (both buildings being part of the former barracks) to the City Museum with which it shares grounds it has not been used by the Museum at any point since it was vacated by the Records Office. Its last known use as a Records Office was not ancillary to the museum.

Is it realistic to think that there is a time in the next five years when the Former Records office could further the social wellbeing and interests of the local community?

- 5.7 The SCT have suggested that the Former Records Office could be brought into use as a Visual Immersive Arts Museum & Creative Community Hub, delivering:
- public exhibitions
 - artist workspace
 - skills training
 - creative workshops for all ages
 - community heritage projects
 - partnerships with schools, universities, and local organisations

¹ <https://librariesandarchives.portsmouth.gov.uk/archive-service-and-history-centre/your-visit/>

- 5.8 The SCT states that 'This model is scalable, sustainable, and achievable through phased refurbishment and grant opportunities. We (the SCT) have already (had) discussions with Heritage Lottery Fund and other public and private organisations and successful bids developed in the past.'
- 5.9 The Council is aware that the estimated bill for the repair and reuse of the former records office stands at £2 - 2.5 million, an amount needed in addition to any ongoing operation and maintenance costs. This extraordinary cost has prevented the Council bringing this building back into beneficial use over the prolonged period of its abandonment, despite the resources available to the City Council. In light of the level of cost needed to make the building habitable, and the lack of any detailed submission from the SCT in respect of how they would raise the necessary capital sums, it is the Council's opinion that it is not realistic to think that there is a time in the next five years when the building could further the social wellbeing and interest of the local community
- 5.10 No exemptions barring the land from inclusion on the list of ACVs have been brought to the Council's attention.

6 Recommendations

- 6.1 The Assistant Director is recommended to **refuse** the Nomination on the grounds that:

The Former Records Office has been vacant for the last 14 years, is not in current use and has not in the Council's opinion been in community use in the recent past. The uses proposed by the SCT would be beneficial to the City, however, they could be housed in a number of other locations across the City without the extraordinary costs associated with the refurbishment of this site and based on the submission by the SCT and comments by the Council it is not considered realistic to think that the site would return to a social wellbeing or community interest use in the next five years. On the basis that the property does not meet the statutory definition it is not considered necessary for the decision maker to consider the financial impact upon the landowner. However, if this were to be taken into account it is suggested there be lesser weight attached on the basis that the Human Rights Act generally protects individuals from decisions or actions that are incompatible with Convention rights rather than public authorities.

The recommendations set out above were approved by

Ian Maguire - Assistant Director of Planning and Economic Development

Signed by: 05.02.26