



# East Weare Camp and Military Battery Structures Portland Dorset

## Review of Proposed Mitigation Including Site Boundary Protection

### Prepared for

Powerfuel Portland Ltd  
The Core, Gore Cross Business Park,

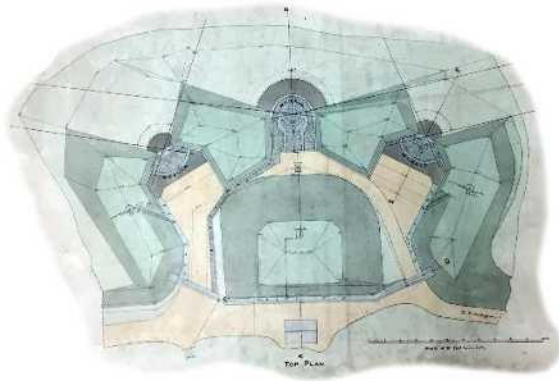
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# Content/Quality Assurance



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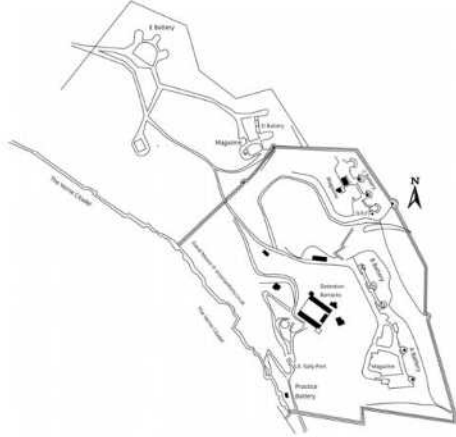
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## 1.0 Introduction

- 1.01 Mann Williams were instructed by Giles Frampton of Powerfuel Portland Ltd (Powerfuel) to carry out a review of proposed mitigation, including boundary protection works to the existing protected site/structures.
- 1.02 The area around Portland Harbour has historically been recognised as an important military strategic location. The mid-C19 was marked by a period of growing political and military concern over French foreign policy and an arms race developed between the two nations. In 1845 the Royal Navy established a base at Portland, constructing a new harbour where its fleet of steam-driven warships could be replenished with coal. In 1859, due to concerns over a possible French invasion, Lord Palmerston, the Prime Minister, instigated the establishment of the Royal Commission on the Defence of the United Kingdom which recommended that vital points along the south coast, including the Royal Dockyards at Portsmouth, Chatham, Plymouth and Portland, be fortified. As a consequence the defences at East Weare, to the south of Portland Harbour, were developed and the Verne Citadel fort (1857-81) and East Weare Battery (1862-9) were constructed. In circa 1880 East Weare Camp was established and from 1889 the rifle range was being built. The building of Verne High Angle Battery in 1892 and Upton Fort in 1902 demonstrates Portland's continuing role as an important strategic location.
- 1.03 East Weare Camp, a self-defensible detention barracks, provided secure accommodation for the gunners and garrison of the East Weare Batteries, A-E. This is the only known example of this type of small defensible barracks. A range finding station and observation post were built near East Weare Camp in c.1901. Converted to coastguard use in 1914, East Weare Camp has had successive adaptations and alterations during the C20. By 1991 it had fallen out of use, was dilapidated and subject to vandalism.
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- 1.04 Mann Williams understand that Powerfuel is proposing an energy recovery facility located on approximately 2.14ha of land in the eastern end of Portland Port.
- 1.05 Historic England has noted that the proposal could result in a negative contribution to the setting of local heritage assets and confirmed that Dorset Council is responsible for establishing if any heritage benefits could be achieved to offset this harm.
- 1.06 The Dorset Council's Conservation Officer initial response (dated 17 November 2020) noted that it was in broad agreement with the impact assessment set out in the Environmental Statement and that "less than substantial harm" has been identified in relation to the setting of a number of designated heritage assets in the local area.
- 1.07 Mann Williams agree with the Dorset Council Conservation Officer assessment of "less than substantial harm" to the designated heritage assets, in the absence of any further mitigation.
- 1.08 The Dorset Council Conservation Officer response went on to suggest potential public benefits and heritage mitigation which could be considered to offset the identified harm. This is consistent with NPPF 202 which states "Where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal including, where appropriate, securing its optimum viable use."

- 1.09 A Framework Heritage Mitigation Strategy (Mitigation Strategy) was agreed between Powerfuel, Dorset Council Conservation and Natural England in mid 2021. These included (a) an agreed programme of works that will secure the long-term future of E Battery a scheduled ancient monument, removing it from the Historic England Heritage at Risk Register and (b) the extension of an existing footpath to provide public access and interpretation to the currently inaccessible group of heritage assets in this area.
- 1.10 The Mitigation Strategy included proposals to reopen a footpath to the south of the site and the progression of phases of vegetation clearance and conservation works to protect the monument, in line with recommendations given in a previous report by Mann Williams in 2021. It also included the erection of a fence to the landward side of the historic structures.
- 1.11 Following agreement of the Mitigation Strategy the Dorset Council Conservation Officer provided an updated response (15 October 2021) which confirmed that the package of works will deliver significant public benefits which should be afforded weight in the planning balance commensurate with the significance of the assets affected. It noted that the removal of E Battery, an asset of the highest significance, from the Historic England Heritage at Risk Register should be considered a highly significant outcome and concluded that the measures will result in benefits to designated heritage assets whose significance is harmed by the proposals.
- 1.12 Mann Williams expect Dorset Council will have consulted with Historic England prior to agreeing the Mitigation Strategy with Powerfuel. Related to this we note Historic England's response dated August 2021 that concludes "A programme of works that will conserve and secure the long-term future of the batteries, provide public access and interpretation will help offset any harm that may result from this proposal".
- 1.13 Mann Williams agree with the positions stated by the Dorset Council Conservation Officer and Historic England in 2021.
- 1.14 In February 2023 Historic England and a new Dorset Council Conservation Officer submitted responses regarding the impact of the proposed landward side fencing and the overall value of the Mitigation Strategy.
- 1.15 This report provides further context for the benefits of the Mitigation Strategy and responds to the recent comments from Historic England and the new Dorset Council Conservation Officer.

## 2.0 Mitigation Strategy – E Battery

- 2.01 The image below is a view of the site of E Battery looking north west across Portland Harbour. The area of the site is heavily vegetated with the majority of the structure covered. An overlay of the approximate location and configuration of E Battery has been added for reference along with the route of the proposed publicly accessible permissive path.

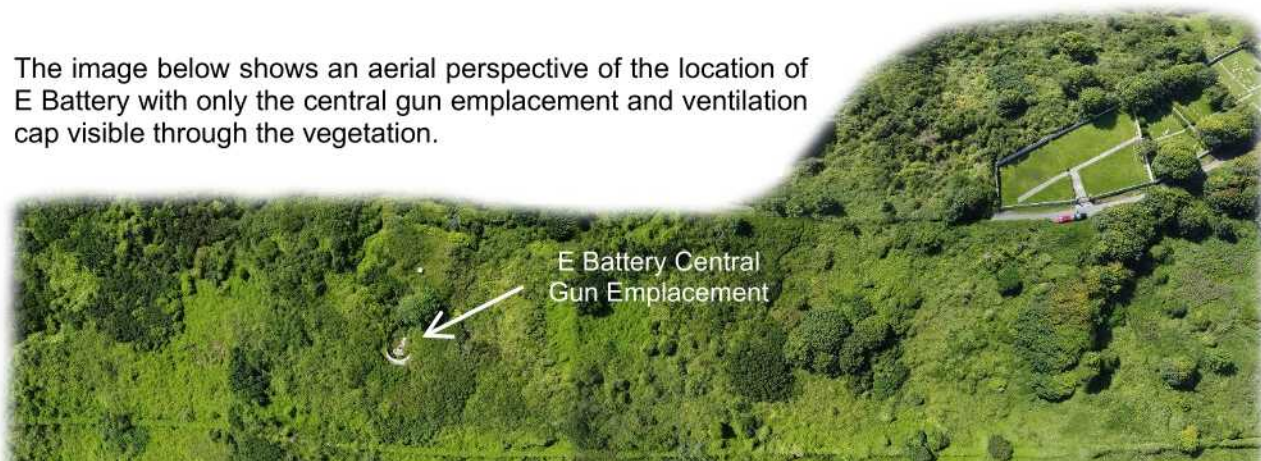


- 2.02 E Battery is a scheduled monument and therefore is classified as an asset of the highest significance
- 2.03 E Battery has been listed on the Historic England At risk Register since 2012, where its condition has been consistently stated as “generally unsatisfactory with major localised problems” with a “declining” trend. Mann Williams is not aware of any mitigation undertaken since 2012 to improve the condition of this heritage asset and it remains on the at-Risk register in 2022.

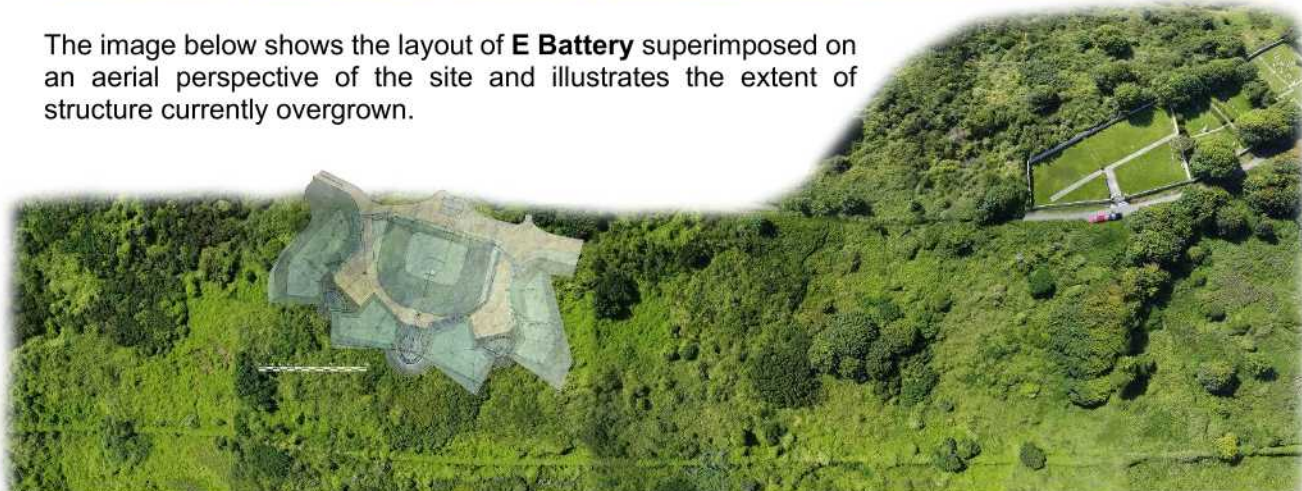


2.04 It is noted that the Battery structure is formed with generally large Portland Stone blocks and is robustly built to withstand military service, however invasive vegetation still has potential to cause significant damage to the structure and is occurring. Significant levels of local vandalism and graffiti can also be seen and illustrate the active challenges that exist in the need to protect the site.

- 2.05 The image below shows an aerial perspective of the location of E Battery with only the central gun emplacement and ventilation cap visible through the vegetation.



- 2.06 The image below shows the layout of **E Battery** superimposed on an aerial perspective of the site and illustrates the extent of structure currently overgrown.



- 2.07 The image opposite illustrates the extent of vegetation that is present across the structure of E Battery. The vegetation in the image is concentrated around exposed wall heads and is a significant ongoing risk to the masonry, particularly where it is penetrating joints.



- 2.08 At this stage the majority of the structure is inaccessible for inspection but there are concerns that the high level areas are at an elevated risk of damage and vegetation should be removed at the earliest opportunity.

- 2.09 The Mitigation Strategy includes removal of invasive vegetation and implementation of conservation repairs to fabric. Enhanced public access will be provided to this asset, and other designated assets in the area that are currently not accessible, providing additional public benefit. A landward fence will be implemented that will improve security for the port and also the heritage assets, which will reduce the risk of future local vandalism and damage to these assets as has historically been the case.

- 2.10 E Battery has been on the Historic England At risk Register for over 10 years. The condition of the asset is declining with the principal vulnerability being scrub/tree growth. A sustainable conservation strategy for the site is essential in order to protect this heritage asset for future generations.

## 3.0 Response to February 2023 Comments

- 3.01 Mann Williams agree with the positions stated by the Dorset Council Conservation Officer and Historic England in 2021 which confirmed that the improvements to E Battery, including removal of this asset from the Historic England at-Risk Register would be substantial and offset the “less than substantial harm” impact on the heritage of this, and other local assets, as a result of the energy recovery facility.
- 3.02 In January 2023 the Dorset Council Planning Officer arranged a further meeting with Historic England. This resulted in a new submission from Historic England in February 2023 (reference appendix B). The new Dorset Council Conservation Officer made similar representations, focusing on the impact of the landward fencing.

3.03 We would provide the following responses to comments contained in these recent submissions:-

	Comments	Response
3.04	The fencing will introduce harm to the significance of the batteries, their immediate settings, and their wider settings.	The fencing will be on the landward side of structures that were designed to be principally seaward facing. It is unclear how the placement of a fence in the proposed location would harm the setting. Even if this were to be the case, the additional protection to the heritage as a result of the security provided, against future vandalism and further damage to these assets, should be considered to be a substantial benefit.
3.05	The proposed fencing will fundamentally alter the way the assets can be experienced. The series by their very nature were designed to be open so views through the Port and landscape could be observed.	The asset currently cannot be seen or experienced from any location as it is completely surrounded by invasive vegetation that is actively causing ‘harm’ and is contributing to E-Battery being on the ‘at-risk register.’
3.06	The level of harm to the significance of several heritage assets from the energy recovery facility will be considerable and the mitigation benefits are unlikely to offset the harm.	<p>Historic England note “considerable” harm would be caused by the energy recovery facility (excluding any mitigation) but this is not a accepted grade of harm in heritage terms as this can only be “substantial, less than substantial or no harm”. The Dorset Council Conservation Officer in his response of November 2020 graded the level of harm as “less than substantial”. We agree with this opinion and, given no contrary view has been offered, assume that Historic England also is in agreement.</p> <p>In our view the removal of E Battery, a scheduled ancient monument and an asset of the highest significance, from the Historic England At risk Register represents substantial benefit that outweighs the “less than substantial harm” of the proposals on the setting of local heritage assets.</p> <p>Historic England's position appears to relate solely to a perceived visual and aesthetic consideration. This needs to be compared to the primary objective of developing a conservation strategy for E Battery that allows vegetation around and, on the structures, to be removed to halt the physical damage being caused.</p> <p>In addition, the opportunity to provide public access to this asset, and other local heritage assets, provides further public heritage benefits.</p>

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## 4.0 Conclusion and Recommendations

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- 4.01 The Battery Structures at Weare, Portland currently surrounded by invasive vegetation. The ravages of time, neglect and the action of this invasive vegetation is creating significant risk of decay to the principal fabric of the structures.
- 4.02 E Battery, a scheduled ancient monument and an asset of the highest significance has been on the Historic England At-risk Register since 2012. No mitigation has been undertaken to improve this asset over the past 10 years and, in the absence of any future action, its condition will continue to decline.
- 4.03 In 2021 this active and progressive risk to the monument from vegetation was set out with a recommendation for prompt action to control or preferably remove as a matter of urgency.
- 4.04 The proposals to effectively manage the site and provide a secure protective fence to the landward side of the historic structures where the public can potentially access would be seen as a sensible and practical approach to a medium-term solution.
- 4.05 The monuments and structures were 'sea-facing' structures so a protective fence located on the landward side would not appear to cause any net-harm to a group of structures that are already suffering from decades of neglect, vandalism and the effects of invasive vegetation.
- 4.06 To develop and progress a sustainable medium and long-term strategy for the site it would be considered essential that a secure zone around the monument/structures is created.
- 4.07 Far from causing 'harm' to the site, it would be our view that the proposed protective fence is of significant and quantifiable benefit, as it allows conservation works and management of the historic site and structures to progress.
- 4.08 It is also considered important to note that a fence can, in the future, be removed and this meets with a fundamental conservation principal of reversibility. In contrast the ongoing deterioration of the historic structures through the inability to effectively control access and management of the site is ongoing and progressive. This is to the direct detriment of the historic structures and would be considered to far outweigh any perceived negative impact of a boundary fence.
- 4.09 It is not, in any way, disputed that an historic site, listed building, scheduled monument etc, should ideally be presented in a form as close to its original setting as possible. The reality is that sites need protection, and this is recognised and accepted across the UK. The need to physically protect the fabric of an historic structure is of primary importance.
- 4.10 It would be our strongly held opinion that the proposed fencing is to the significant net benefit of the heritage asset and should be permitted.
- 4.11 In conclusion, in our view the "less than substantial harm" that has been identified to the setting of local heritage assets as a result of the energy recovery facility proposal is outweighed by the substantial benefits achieved through the restoration of E Battery and removal of this asset from the at-Risk register, and the provision of access to this and other currently inaccessible heritage assets to allow the public to experience the assets and improve understanding of the local area history.