

The case for change to the Treasury rules on the Disposal of Surplus Government Land in favour of social, environmental and economic benefit to local communities

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The current disposal system

According to the UK 1992 Treasury rules, the state owns or leases all state property and assumes the right to dispose of it, usually by selling it to the highest bidder at maximum planning value within three years, with the proceeds ultimately accruing to the relevant ministry: in the case of redundant defence sites: the Defence Infrastructure Organisation of the Ministry of Defence.

The DIO was formed in 2011 to bring together the management of the MoD's estate, to reduce its running costs and create commercial opportunities.¹ In 2016 the MoD published *A Better Defence Estate*. It covers about 1.8 per cent of the UK land mass, but “overall it is still too big, too expensive, with too many sites in the wrong locations... and 40 per cent of our assets are more than 50 years old. The Armed Forces are 30 per cent smaller than at the end of the last century but the estate has only reduced by 9 per cent.” A list of army, navy and airforce sites for disposal with dates followed, but these disposals have not all been implemented eg HMS Nelson Wardroom Portsmouth, HMS Sultan, Southwick Park...²

The Cabinet Office Guide for the Disposal of Surplus Land (2017) said “Officials within DIO work diligently on behalf of the MOD to maximise the potential benefits from the sale of any surplus assets. The Department is obliged by Her Majesty’s Treasury Managing Public Money protocols to maximise sale receipts which are re-invested in operational requirements. Treasury guidelines state that transactions such as sales between Departments should generally be at full market value even if transferred to other public sector bodies (including publicly sponsored housing associations). If no other government departments express an interest, the site is sold in a way which achieves best value for the taxpayer. This is usually via the open market.”³

“The disposal of surplus government owned property is an important part of the Government’s drive to improve its estate management and create an efficient, fit-for-purpose and sustainable estate that meets future needs. This means disposing of surplus land and buildings in a way that delivers value for the taxpayer, boosts growth and delivers new homes.” If not required by another public body, it must be disposed of on the open market, except when there are ‘wider public benefits, consistent with the principles of Best Value.’³ (3.2.4, 3.2.5)

The Green Book presents the techniques and issues that should be considered when carrying out assessments, to promote efficient policy development and resource allocation across Government. The guidance emphasises the need to take account of the wider social costs and benefits of proposals and to ensure the proper use of public resources. In some cases it may be justifiable to choose the option which does not generate the highest Exchequer receipt.³ (3.2.4)

However, examples of more locally beneficial disposals at less than the highest price are rare.

Criticism of the MOD DIO by the National Audit Office, the Public Accounts Committee and in the press

The DIO was criticised by the National Audit Office in 2016 because the performance regime it had set for Capita, its strategic outsourcing partner, was "not fit for purpose" and was failing to incentivise sustainable spending reductions (MoD estate plans hit by short-term cuts and contract weaknesses – NAO".⁴ In 2021 the National Audit Office criticised the MoD's site disposal process for not achieving its disposal targets. In 2022 the Cabinet Office announced a new strategy, including selling off £1.5bn worth of state-owned buildings and cutting £500m from the estate's operating costs. But in December 2022 the Public Accounts Committee criticised the Cabinet Office for poor management and a "lack of ambition" which left the taxpayer to pay for costly leases and maintenance charges on the government's £158bn portfolio of government property.

On 21 December 2022 George Hammond's article in the *Financial Times* said 'Ministers accused of wasting taxpayers' money on UK property estate.' 'In 2018, ministers created the Government Property Agency as part of the Cabinet Office to manage a sprawling portfolio held by various departments. But its ability to do so effectively has been held back by crumbling IT systems and lack of a detailed understanding of conditions in the office market... The database is close to two decades old and a replacement system has been delayed several times'.⁵

The Public Accounts Committee has several times criticised the MOD's Defence Infrastructure Organisation - which is responsible for disposals of surplus defence land. The DIO publishes lists of sites it is minded to close, but in response to political events it may change its mind on whether or not to go ahead with a closure; either way, there is often no in advance dialogue with the affected local authorities. There are sometimes mass protests against proposed base closures. Jobs and suppliers' contracts may be lost as well as other benefits from military activity. Military secrecy may mean that local authorities do not always have local plans in place when sites are closed. If developers have paid a high price for a site, they will seek permission for new land uses which produce a high financial return. The short three-year timescale required may not enable the needs of the ex-defence community to be met, because sustainable reuse often takes time to develop. Even if the proposed new uses do not address local needs, planning authorities may be deterred from refusing planning permission by fear of the cost of appeals. New owners of these often complex sites have to pay for decontamination to the standard required for their intended new land uses. On the rare occasion when a site was given to a local authority free, there was no accompanying dowry to pay for the extensive decontamination required. As the MOD is not funded to keep its historic structures in good repair, the cost of neglected maintenance may mount up, adding to the costs of subsequent adaptive reuse.

While the current disposal system is intended to bring monetary recompense to the national Treasury and to government departments, there is evidence that it may, on the contrary, not achieve the required maximum financial return either. Significant

amounts of 'clawback' are paid by developers to the Treasury when their profit exceeds the purchase price they paid – for example Gunwharf in Portsmouth and Haslar Naval Hospital in Gosport.

Parliamentary Questions

On 22 March 2022 Stephen Morgan MP asked the Secretary of State for Defence, with reference to the report by the National Audit Office, Optimising the defence estate, published in June in 2021, **what assessment his Department has made of the potential impact of closure of sites on local communities...** Jeremy Quin MP Ministry of Defence replied on 24 March that: 'The Ministry of Defence has a requirement to deliver its defence tasks as efficiently as possible and where sites are no longer required or critical defence tasks are better met through using another site this includes their disposal. Individual social and/or economic assessments are not routinely conducted as part of this process, however, the Department continues to work closely with local authorities to determine the impact of these decisions and how we can release surplus military sites for meaningful future use.'⁶

On 29 March 2022 Stephen Morgan MP asked the Secretary of State for Defence, **whether his Department has plans to assess other countries' practice in respect of the disposal of surplus government land, including Italy, France and Germany where redundant defence sites are given to agencies separate from defence ministries.** In his reply, Jeremy Quin MP ignored the question and replied on 29 March that: 'The Ministry of Defence works in accordance with HMT guidelines for the disposal of land. Once a site is declared surplus to Defence it is first advertised on a cross-Government database to see if it is required for other Government purposes, before if that is not the case being advertised on the open market. On sale we seek to maximise sales receipts for the taxpayer.'⁷

On 31 March 2022 Stephen Morgan MP asked the Secretary of State for Defence, **what assessment he has made for the implications of his policies of the National Audit Office, Optimising the defence estate,** published in June 2021. On 25 April Jeremy Quin replied: 'The Department has carefully considered the four main recommendations from the National Audit Office Report and has already implemented a number of measures to enhance delivery of our estate optimisation plans, including: a re-baselining of the disposals schedule; a review of the Defence Estates Optimisation Portfolio governance model; plans to adopt a new Delivery, Commercial & Procurement Strategy; and improved data collection.'⁸

These responses suggest that there is no acknowledgement by central government that the current disposal system is dysfunctional, and that even though ministries of defence work together as allies to prevent outbreaks of war and if necessary to fight common enemies, the government is not interested in reform of the disposal system of sites they no longer need for national defence, which could draw on other countries' more locally beneficial experience.

The Public Interest

The Hampshire based Bill Sargent Trust Research for Action sponsored Julian Dobson's studies '*In the Public Interest? Community Benefits from Ministry of Defence Land Disposals*' and '*Forces for good: local benefits from surplus military land*' in 2012. These studies investigated how to reconcile the two seemingly irreconcilable approaches – maximum cash return to the Treasury versus local gain in jobs, new facilities, open space, housing. He found 'a lack of overarching academic research and little to suggest the issue has been high on the national policy agenda' and 'minimal interest in the issue from central government'. He identified a perennial tension between short-term budgetary exigencies of the public bodies selling land – and the long-term needs of the local community. Community benefits tend not to correlate with sale price or 'value for money'. Choices were made between the desire to maximise capital receipts from public land disposal and using it for social benefit. It was not surprising that benefit to local communities from a more considered approach has been ignored by the Ministry of Defence in favour of maximum financial return to the defence budget. A competing narrative to the logic of cost-saving and maximising the immediate financial return to the taxpayer is that the public good is best served by using public assets and their potential development to benefit the communities most impacted by them.⁹

Proposal

As part of dismantling of the UK's very centralised state and instead devolving land use decision-making for these specialised sites to locals, a new more locally beneficial procedure for disposal of former defence property is proposed. Its aims are to institute a more orderly and locally responsive disposal process where local needs are met in the new land uses; where there are historic structures which could be reused, to address their neglected maintenance; and to encourage new sustainable and locally beneficial new uses for surplus defence sites, in partnership with local communities whose hopes and aspirations are fully taken into account and incorporated in the new land use outcomes, bringing their local communities social, environmental and economic benefits. Other countries' disposal systems have crucial differences from the UK's in how they handle disposals, which offer workable and beneficial alternatives.

In the United States local communities can plan future uses of ex-defence sites to meet their needs (Base Realignment and Closure Act 1990). Once plans are agreed, the sites may be transferred to them free. In addition, in the US and France their Ministries of Defence have regeneration agencies with funds to help local communities to rebuild their economies after bases close. In Italy and Germany disposals are handled by other government agencies, not by part of the ministries of defence. These crucial differences from the UK system contribute to state land disposals being defined by gains to the *local* public interest (social, environmental and economic), rather than solely by a centralised financial one.¹⁰

The accompanying paper sets out other countries' policies and practice in detail.¹¹

A new locally responsive and controlled procedure

The reorganisation and scaling back of Britain's armed forces over the next decade will affect communities all over the UK. The size of the armed forces will fall by at least one tenth by 2020¹³, and number of civilians employed to support them will drop by one third in the next five years. As a result large numbers of former military sites will become surplus to Ministry of Defence requirements.

Many of these sites will be in areas that have strong social and economic ties with the armed forces. Communities will lose employment and business opportunities; but they will also have a rare chance to benefit from new uses of the sites that become available.

These benefits could include new business and economic activities; affordable housing; services and facilities for ex-service personnel; the preservation of heritage assets or the creation of new public green spaces. But they will only be realised if the Ministry of Defence builds long term partnerships with local communities.

Such partnerships depend on the Defence Infrastructure Organisation, which is responsible for the MOD's land and property, being released from pressure to obtain the maximum cash receipts as quickly as possible when disposing of assets. A longer term understanding of value needs to inform its actions, with the wider public benefit overriding narrow departmental interests.

We suggest four key principles should inform the wave of asset sales that is expected to take place:

- Assets purchased or created with public funds should be disposed of in ways that maximise public benefit which is not solely confined to financial return
- Public value should be interpreted broadly, using concepts such as 'total economic value'
- Communities affected by disposals should be party to timely decision-making
- Long term visions should be developed for the future use of ex-military sites.

This paper argues that the government's localism agenda, including community asset ownership and neighbourhood planning, should be aligned with the disposal strategy in order to obtain the best outcomes for everyone, meeting the needs of local communities and the armed forces alike.

In particular, site disposals should be managed to meet the needs of ex-forces personnel and formerly defence-dominated communities wherever possible, enabling veterans to play as active a part in civilian life as they have during their time in the forces. The recently established Armed Forces Covenant should provide a framework for long term partnerships to create shared benefits both for veterans and for local residents.

Recommendations for new regulations on the disposal and redevelopment process

This draft incorporates experience from the Hampshire Buildings Preservation Trust/Royal Town Planning Institute Seminar of planners, local authorities, developers, conservation architects and local communities held to discuss defence disposals and redevelopment in 2017. It was submitted to the Defence Select Committee but not discussed there. Its recommendations would benefit from further input from the Local Government Association, Royal Town Planning Institute and other interested parties, but its intention is clear: that as part of the decentralisation of UK governance, disposals of publicly owned sites should benefit the *local* public interest and local communities affected by defence site closures, rather than the sales proceeds accruing to the Treasury and the MOD,

1. Before release – at national level

Essential:

* **With Crown immunity removed, the MOD must comply with planning statutes.**

* **Regular communication between the DIO's regional offices and local authorities** where closures are under discussion via MOD local community liaison representatives, to discuss proposed closures and disposals. Communication needs to be regular, early, clear, transparent and timely - in order that local authorities, communities and developers have time to respond positively and build sustainable land uses for these sites into preparation of their local plans.

* **Clawback** where the developer pays the Treasury a proportion of the profit subsequently made over the first purchase price has operated several times at Gunwharf, Haslar Hospital and elsewhere. These moneys might usefully fund a **MOD Conservation Group**

* A national forum **for all participants in the regeneration process would be useful to share experience of regeneration and good practice between local authorities and community groups and to influence government.** The US Association of Defence Communities is a forum and lobby in Washington DC. Method: dedicated infranet, website, publications, regular seminars, a dedicated website or e-publication.

The University of Portsmouth School of Architecture has an **international Defence Heritage** Group of practitioners and academics, which is applying for a networking grant to share experience.

- Publicise in local and national media the **effects of defence cuts on local communities and examples of community-led regeneration.** A campaign would help to win over hearts and minds to the potential of defence sites for local regeneration.

* **Good practice guides:** The EU funded several good practice guides eg *ASCEND: Achieving the Socio-Economic Re-use of Former Military Land and Heritage. Model Management Framework.* Another was *Regeneration through Heritage. Understanding the Development Potential of Historic European Arsenals* in which

English Heritage was a partner. These partnerships' contribution is assessed on pages 13/14 of the attached document ¹¹. Would a **UK based good practice guide** linked to the forum proposed above, based on successful examples of sustainable regeneration be useful?

2. Historic defence sites

The issues that arise are: **urgency versus resource constraints, multi-designations** adding to their complexity, **flood risk, coastal erosion, contamination, poor access, depressed land values, the unique and complex form of many structures**, the complexity of unravelling sites' **significance**, the many **Buildings at Risk**, the **complexity of accessing funds** and the **failure to recognise the economic value of heritage**.

The exclusion of active defence sites from local authorities' powers to issue **Urgent Works and Repairs Notices** requiring repairs to decayed historic buildings **needs to be removed**, especially where the MOD have no use for them and they have long been empty and unused.

Neglected maintenance has allowed the condition of listed and scheduled structures to deteriorate, so eventual remedial costs will escalate. As a stitch in time saves nine, **funds allocated to maintenance of unused defence property** are a worthwhile investment in the potential for future use – by the MOD or subsequent owners.

*It is important to identify who is to pay for **maintenance and restoration of infrastructure** such as dock walls, culverts, basins, caissons, cranes, water, electricity and sewerage services. These may need to be separately funded via a sinking fund, which service charges to the new occupiers would not cover.

* **Historic England's Heritage At Risk Registers (HAR)** are intended as a spur to action – to maintenance of historic structures and to their sustainable new use. It is not acceptable for the MoD to state that 'austerity measures will continue to provide challenges for MOD heritage management. The effects are already being experienced with a decline in the condition of listed buildings and the scaling back of condition assessments as a result of budgetary constraints.' (MOD Heritage Report 2011–2013, 2014, para. 41). Many historic defence sites particularly in the southeast, are on the Register. They need maintenance, reuse for defence purposes – or disposal to the civilian property market or transfer to civilian bodies as community assets.

* **Sites left empty for too long whilst MoD makes up its mind to sell, lead to significant deterioration** – for example Daedalus wardroom. The crucial route to sustainable regeneration for them and others on the register is for **new and appropriate uses** to be found, so that **operational budgets also finance conservation**. This is the best way to secure their conservation and future and to bring return to the public interest. Vacant buildings are at greater risk of deterioration than occupied ones, where problems are more likely to be addressed before they become critical. Repairs to vacant buildings should be given due importance, and allocating a risk category may aid this. (*Managing Heritage Assets* Historic England, 2009 p.31). The effect of deferring work, causing 'structural or weather tightness issues' and 'fabric deterioration' (Ibid. p. 30), should be taken into account when

deciding priority and urgency where buildings are vacant (as with all the structures on the At Risk Register). *Leaflet 12: Historic Environment* (Ministry of Defence, 2010 paras. 12-52) declared that “the MOD is committed to resolving its HAR issues and ensuring assets do not become at risk. *Quadrennial inspection reports on all listed buildings and quinquennial inspection reports for scheduled monuments in the naval estate should be designed to prioritise maintenance and repairs. On 16 January 2023 the DIO’s archaeologists are ‘to use the world’s first global Historic Environment Record (HER), an online database which will revolutionise the management of heritage on the MOD’s UK and overseas estate’, although, of course this only applies to the small number which are of historic value.¹² **Doing nothing is no longer an option.** Effective **Conservation Management Plans** should be drawn up by the MoD, DCMS, Historic England and local authorities. There needs to be a mechanism to enable enforcement against neglect of listed buildings regardless of ownership.

Understanding a historic site is an essential stage in determining its sustainable future. Its setting, plan form and layout, condition, building materials and architectural features need to be taken into account. Priority should be given to **retaining and enhancing its local character and distinctiveness and to enhancing its historic setting.** The more significant a heritage asset, the greater the weight that should be given to its conservation and its capacity for change, and to the amount of detail in a planning application. Specialist defence structures are particularly difficult to find sustainable new uses for. Gosport examples are the listed Submarine Escape Training Tower, and the unique Cavitation Tunnel. A further problem is **overlaps between scheduling and listing**, making consents complex and time consuming. These designations need to be simplified.

Local planning authorities can assist developers’ understanding these issues. This understanding, also enriched by **Archaeological Management Plans** and **Conservation Management Plans** should be used to inform the constraints and opportunities available. **Historic features should be retained** where possible. **A Condition report and artefact survey** were carried out to identify the significance of Point Battery Portsmouth.

The current state of **historic defence structures** is such that their conservation requires both **an immediate and a long-term broad-based plan of action.** In order for them to be restored to a useful condition, they should receive more of the operational naval base budget, with a higher level of annual maintenance than at present. This target could be managed through a MoD Conservation Group or a Heritage Partnership Agreement, as recommended in *Leaflet 11: Historic Environment MOD conservation groups* (Ministry of Defence, 2010) which set out the benefits and functions of MoD Conservation Groups; Leaflet 11; *Historic Environment MOD conservation groups* (Ministry of Defence, 2010); **and** MOD Leaflet 12 2010.

These buildings were built of predominantly local materials with public money, to defend the country. They constitute public heritage; the Local Authority should be taking a leading role in its conservation. For listed structures to be restored to a useful condition, they should receive more of the operational defence budget, with a higher level of annual maintenance than at present. Quadrennial inspection reports on all listed buildings and quinquennial inspection reports for all scheduled monuments should be undertaken. **A positive and constructive approach to conservation is**

key.

3. Developers

*From the developers' point of view: "We must breathe new life into unused Military Historic Sites by working in a **collaborative and proactive way to deliver the best possible outcome for all parties**": David Craddock Elite Homes developer at Priddy's Hard Gosport. Historic military sites need a different/open approach in terms of planning and conservation requirements.

***The cost of enabling development is substantial** – and the developer can't pay all. The economic drivers need to be understood. Developers can't take on a site with indefinite costs, and fixed site contracts are not possible on historic sites. There is a need to look at 'Bigger Picture' benefits rather than specific losses to historic elements of buildings and landscape. The onus should be on **creating partnerships with owners of Historic Sites to facilitate best design, and to deliver appropriate density to create best value**. Good Design and a creative approach is key to success.

For developers, a particular challenge is to overcome the protectionist approach that the **very many consultees** seem to have! These include:

- *Historic England
- *Natural England
- *Environment Agency
- *Highways Agency
- *County Ecologist
- *County Archaeologist
- *Local authority Conservation Department, Planning Officers, Council Committee
- *Parish Council
- *Local residents

Greater Collaboration & Understanding

*to achieve the best out of every site all parties have to appreciate and consider other consultees and stakeholders position as well as their own;

*A loss in one area can and should be a gain in another;

*To constantly expect the developer to bear the costs and to take all of the risks will mean fewer sites like these will get brought back to life;

*to appreciate that the costs of enabling these developments to go ahead arising from abnormal conditions is substantial and that something has to give to make it possible to pay for the long term regeneration of the Historic elements of the sites.

4. Planning stage

Masterplanning of large ex-defence sites responsive to their history and historic layout - in accordance with local authority local plans and economic priorities - is a useful process in determining sustainable reuse.

Recreation of lost **employment** including work using specialist high skills should be a priority in redevelopment as well as housing. CEMAST College, Innovation Centres, Solent Airport, business development are all very positive examples of what can be done on an ex-MOD site.

Housing development should always be closely related to transport, education and social facility planning.

Section 106 Agreements can be used by local authorities to secure funding from subsequent sales of parts of sites by the new owners against the costs of conservation - as was done at Haslar Hospital.

LPAs need to be properly informed as to the significance of a site's heritage assets and landscaped setting and must **stress the importance of 'front-loading' detailed site and building appraisals**. **Frequent site meetings for major sites** are necessary and this needs resourcing. Excellent practice is the close supervision by Gosport's Conservation Officer of large sites such as Haslar Hospital via two weekly meetings on site which saves time and paper trails.

Hybrid Outline Consents. For complicated, multi-phased redevelopments it is not reasonable to expect the developer to know precisely when each building will be tackled. Mass, form, layout, texture need to be considered before giving consent, then dealt with on a detailed basis, phasing the work on a critical path. Phasing also helps developers to secure and fund the reuse of large sites.

Other plans and supplementary planning guidance need to be taken into account. An example is Portsmouth's Seafront Masterplan Supplementary Planning Document. 'The ARTches Project', was outlined within the Seafront Masterplan Supplementary Planning Document, dated April 2013.

It is important to promote the **intrinsic value of large military-heritage sites** to the wider community, and their economic potential.

Genuine community consultation – bottom-up as well as top-down - needs to be built into the regeneration process, especially where no public access was previously available. Methods include Heritage Open Days, site visits inviting feedback, Community Planning Events, Enquiry by Design, Planning for Real, public exhibitions... Local residents are resistant to change. Developers responsive to local concerns who gain public support for their proposals benefit from faster and less contested process toward planning consents.

Experiments in sustainable redevelopment such as Eco-towns may be appropriate to the redevelopment of ex-defence sites.

Both national and local Defence Museums contribute substantially to the local economy.

5. Design Phase

New buildings should be sited so they are sensitive to the historic plan form of the site and its wider setting in the landscape. **Enabling development** should be considered in order to secure the future of historic buildings of high significance and sensitivity to change. **Short-term solutions** might include mothballing, temporary uses, carrying out urgent repairs, securing it and protecting it from fire...

Adaptive reuse plans of historic defence buildings should be **reversible and non-destructive**. This essentially allows (should the need arise) for the removal of any additions and the reversion of the structure to its current state with minimal visible changes.

6. Construction Phase

Contamination and Pollution during redevelopment. Sealing in accumulated contamination may be acceptable where a military airfield becomes a civil one, but much depends of whether the MOD has kept relevant records. Should the MOD pay to treat the pollution it created?

Building dust/debris problems during redevelopment need much earlier, tighter control. A Dust Management Plan might recognise a site as a 'High Risk' site with 'Sensitive Receptors' (i.e. neighbours!). There may be limited water supplies in some parts of the site and serious cost implications to the contractors

Problems with the modern trend of using **sub-contractors**. There must be a named, responsible site manager with full control of sub-contractors and able to stop unplanned, Bank Holiday removal of unwanted hedges, for example. Unauthorised demolition is completely unacceptable.

7. Ways Forward:

Research about defence disposals and sustainable redevelopment of Defence Heritage in the UK and other countries is deposited in the Portsmouth History Centre of Portsmouth Central Library. This database, being developed with Portsmouth School of Architecture Conservation studies, is available for students and other researchers, to learn from experience and good practice.

Dialogue at national level between the DIO, Local Government Association, RTPI and other interested parties which includes consideration of whether other countries' practice in reuse of surplus defence sites would be appropriate in the UK, in order to improve the current system, in which there's no learning of what works and what doesn't work from site to site, in favour of a much more locally beneficial system.

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