REBUTTAL PROOF OF EVIDENCE
on
Landscape and Visual Matters

[redacted]
BSc (Hons) MA DipUD CMLI

For site at:
Haslar Immigration Removal Centre Expansion, Gosport

On behalf of Appellant:
The Home Office

Rebuttal Proof of Evidence

PINS Reference Number:
CROWN/2026/0000005

LPA Reference number:
26/00216/CROWN

Date: November 2026

7a Wintex House, Easton Lane Business Park, Easton Lane, Winchester, SO23 7RQ
01962 856008| ubu-design.co.uk

AtkinsRéalis - Sensitive / Sensible [FR]

TABLE OF CONTENTS

Rebuttal Proof of Evidence

Section 1: Rebuttal Evidence Page 1

AtkinsRéalis - Sensitive / Sensible [FR]

1. Rebuttal Evidence

Introduction

1.1. This Rebuttal proof of evidence responds to the Proof of Evidence of Mr Simon Barnett (Mr Barnett) and Mr [redacted] (Mr [redacted] on behalf of Gosport Borough Council (GBC), and the Statement of Case of No Detention No Haslar (NDNH). I have focussed on what I consider to be the main points of dispute in relation to landscape and visual matters where I am able to provide further clarification, and my silence on any particular issue should not be taken to indicate agreement.

1.2. These points principally comprise the built form relationship of the proposed development to its context, separation from the Haslar Barracks Conservation Area, views from Fort Road and Clayhall Road, and landscape and visual impacts on character and appearance.

1.3. The impact on historic assets and their setting is addressed by Ms [redacted] in her Proof of Evidence and Rebuttal.

Contextual Relationship of Built Form

1.4. Mr [redacted] considers that *"Three storey buildings of significant footprint will appear incongruous in the area, not just compared with the buildings of lower height within the Conservation Area, but also the surrounding residential development which is all two storeys in height."* (Proof of Evidence of Mr [redacted] para 5.3)

1.5. As discussed in my Proof of Evidence at paragraph 7.3, the size and scale of the proposed three storey buildings follows the existing wider pattern of larger scale built form along the coastline, represented by the buildings of the Royal Hospital, Canada House and Haslar Terrace to the north-east and Fort Monckton to the south-west, which represent three storey buildings of larger massing. The pattern of built form follows a clear separation between the two storey suburban residential pattern of Clayhall, and the existing development along the coastline, which the proposed development respects.

1.6. At a local level, in considering the immediate context of the site, although there would be some increase in scale from the buildings of the Haslar Barracks

Conservation Area and the two storey Clayhall area, this is comparable to scale changes across the peninsula. Furthermore, there is a good degree of separation proposed from the Conservation Area and Fort Road, which both allow for tree planting to be incorporated in the intervening space, which can be conditioned through a Landscape Plan at Reserved Matters.

1.7. The height and proximity of the proposals in relation to heritage assets and their setting and the design of the proposals in relation to the Conservation Area are considered by Ms [redacted] in her PoE and rebuttal response.

1.8. Mr Barnett states *"it is considered that the current indicative proposals are not well designed in terms of scale, massing and detailing, nor do they have any regard to their setting. As such the proposals do not demonstrate that the quantum of development can be accommodated in a visually acceptable way."* (Proof of Evidence of Mr Barnett, para 5.15). I address this view in my PoE at paragraph 7.6.

Separation from Conservation Area

1.9. Mr [redacted] considers that *"The indicative separation of the proposed accommodation blocks to the Conservation Area boundary is considered insufficient to overcome the overbearing relationship that the proposals will have on the Conservation Area. Whilst the approximately 24m gap will allow for planting between the Conservation Area and new buildings, screening can only mitigate negative impacts, rather than removing impacts or providing enhancement…"* (Proof of Evidence of Mr [redacted] para 5.7)

1.10. With 24m separation between the Conservation Area boundary (demarcated by the security fence) and the proposed buildings, there is sufficient room to accommodate narrow canopy trees offset from the proposed building, while observing the tree planting limitations in relation to security requirements (paragraph 6.1, p19 LVIA). Tall species trees could be introduced which would screen and soften the proposed buildings and additionally provide enhancement in predominantly utilitarian views dominated by security fencing.

Views from Fort Road and Clayhall Road

1.11. In his review of the assessment of Haslar Barracks Conservation Area, Mr [redacted] considers views along Fort Road and Clayhall Road. He considers that

"The immediate setting is compromised by the aforementioned security fencing, however the two storey buildings within the west of the site comprising the former Regimental Hospital located towards the junction of Fort Road and Clayhall Road and landmark Water Tower, are clearly visible on approach from the south west on Fort Road and on approach from the northwest where Clayhall Road becomes Fort Road. Furthermore, when approaching from the west on Fort Road these buildings are experienced against the backdrop of the rear of Grade II listed Haslar Terrace and the historic boundary wall abutting the north side of Dolphin Way, continuing along Clayhall Road to Haslar Road". He concludes that *"Therefore, the way in which Haslar Barracks Conservation Area will be experienced will be negatively effected by the proposed development within its setting on approach in both directions."* (Proof of Evidence of Mr [redacted] para 7.5)

1.12. The LVIA considers views from Fort Road and Clayhall Road within the visual assessment.

1.13. Viewpoint 07 of the LVIA (p37, LVIA) provides a view on the approach from south-west on Fort Road. As Mr [redacted] acknowledges, the security fencing compromises the setting. Changes to the view will principally be due to the introduction of the emergency access from Fort Road and the introduction of the single storey Energy Centre. The proposed three storey buildings, due to their location, will be predominantly screened by foreground dwellings.

1.14. At closer range on Fort Road, the security fencing becomes more prominent, further obscuring the taller Haslar Barracks buildings and Haslar Terrace, while the relative separation within the view of the proposed three storey buildings from these buildings will increase.

1.15. On the approach from north-west on Clayhall Road, the proposed buildings will become partially visible above single storey Haslar Barracks buildings in the last short section of the road approaching Dolphin Way junction (refer to Viewpoints 08 and 09, p38-39, LVIA). They are not likely to appear overbearing in relation to the foreground taller Haslar Barracks buildings due to their greater distance from the viewpoint. A Verified View could be conditioned at Reserve Matters to confirm this. Haslar Terrace is out of the field of view at this close range.

1.16. There is the potential for tree, hedge and shrub planting to soften and enhance views from Fort Road and Clayhall Road, which are currently relatively devoid of

vegetation within the Haslar IRC site, subject to tree planting limitations in relation to security requirements (paragraph 6.1, p19 LVIA).

1.17. Further discussion on impact on views of the heritage assets (Haslar Pennisula Conservation Area, Haslar Barracks Conservation Area and Haslar Terrace) is considered by Ms [redacted] in her PoE and rebuttal response.

Landscape and Visual Impacts on Character and Appearance

1.18. NDHD, in their Statement of Case, suggest that the LVIA did not appear to have accounted for security restrictions on planting when assessing the overall landscape and visual impacts of the development. As clearly identified in the LVIA at paragraph 6.1, security restrictions on tree planting were acknowledged and formed part of the understanding of the project requirements. In the interests of brevity of the LVIA, these security restrictions were not repeated at every reference to planting mitigation, as in many situations they were not relevant. However, they were considered, and where tree planting was not possible in a specific location, this was identified in the assessment. For example, at paragraph 5.47 of the LVIA, I identified that *"For dwellings backing onto the site on the south-eastern side of Fort Road, views are unlikely to change as there is limited opportunity for tree planting near their boundary within the site, due to security constraints. The magnitude of change for viewers from limited dwellings on the north-western side of Fort Road and from Haslar Terrace would be small with a moderate-minor neutral significance of residual effects, while for the limited dwellings on the south-eastern side of Fort Road backing onto the site, the significance of effect would remain as major-moderate adverse, which is a significant effect."* Therefore, where relevant, I have accounted for security restrictions on tree planting when assessing the overall landscape and visual impacts of the development, contrary to NDHD's interpretation of the LVIA.

1.19. In relation to the impact of lighting, lighting is not automatically assessed as part of every LVIA, and a night-time assessment was not requested by the LPA. The proposed development lies within an urban area where artificial illumination already forms part of the established character. Lighting intrusion is not likely to have a significant influence on landscape character or visual amenity, and any lighting mitigation would be agreed through the Lighting Assessment.

1.20. The NDHD, at paragraph 103, states that *"The Inquiry should consider the sensitivity of the affected receptors, duration of effects, winter visibility…"*. Sensitivity of the affected receptors and duration of effects are considered as part of the LVIA. In relation to winter visibility, a winter visual assessment was not requested by the LPA nor was it deemed necessary for this site as there was very little screening from existing tree cover identified in the visual assessment. The NDHD continues *"… and the extent to which mitigation depends on planting which is not possible as a result of the development's security requirements.*" As covered in paragraph 1.18 of this Rebuttal, the LVIA accounted for security restrictions on mitigatory planting when assessing the overall landscape and visual impacts of the development.

1.21. Finally, the NDNH suggests that *"The Inspector should further consider whether the planting proposals relied upon by the Applicant are deliverable and durable, and to ask whether the LVIA has accounted for limitations on those proposals."* The planting proposed as mitigation within the LVIA is deliverable and durable and this can be controlled by conditions (approved landscape plan and management plan).