# Haslar IRC expansion
# Gosport, Hampshire

Rebuttal Response

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wessexarchaeology



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## Rebuttal Response

## 1 INTRODUCTION

### 1.1 Project background

1.1.1 Wessex Archaeology has been commissioned by AtkinsRéalis PPS on behalf of the Home Office ('the Applicant'), to provide heritage support in relation to the proposed redevelopment and expansion of the Haslar IRC, Gosport, Hampshire.

1.1.2 After refurbishment works to the existing IRC buildings which were undertaken under permitted development rights, the current outline application is for new accommodation blocks and associated infrastructure within currently vacant land to the south-west of the existing IRC. Due to the nature of the proposals it is being determined as a Crown Development application.

1.1.3 To inform this application Wessex Archaeology have produced a series of reports:

- Archaeological Desk-Based Assessment (Wessex Archaeology 2026a, ref. 265220.01);
- Heritage Statement (Wessex Archaeology 2024, ref. 258220.05);
- Archaeological Mitigation Strategy (Wessex Archaeology 2025, ref. 285223.01);
- Heritage Impact Assessment (Wessex Archaeology 2026b, ref. 285223.02); and
- Heritage Proof of Evidence (Wessex Archaeology 2026c, ref. 285223.03).

### 1.2 Scope of document

1.2.1 This Rebuttal Response has been prepared to review and respond to the Proof of Evidence (PoE) documents submitted by Gosport Borough Council in relation to the application where they raise points relating to heritage. These comprise:

- Proof of Evidence of Richard Whittington (Principal Conservation and Design Officer); and
- Proof of Evidence of Simon Barnett (Head of Development Management).

1.2.2 These submitted PoEs discuss a number of heritage assets which are considered in turn in the sections below.

1.2.3 Further to this a series of PoEs and a Statement of Case (SoC) have been received by the Rule 13 party, No Detention No Haslar (NDNH). Within the SoC, potential effects upon the Haslar Barracks Conservation Area and nearby heritage assets is covered as 'Main Issue Two'. Relevant points from this response are answered in the appropriate sections below.

1.2.4 Historic England also provided pre-application advice and a consultation response on the application. These are referred to by the Principal Conservation and Design Officer in their PoE. Relevant comments from Historic England are noted below where they relate to the reviewed PoEs.

1.2.5 The impact on landscape and visual matters is addressed by Ms [redacted] in her PoE and rebuttal response.

## 2 REVIEW

### 2.1 Introduction

2.1.1 As noted by the Principal Conservation and Design Officer in paragraph 2.1 of their PoE and by the NDNH SoC (paragraph 82-3), it is true that the application boundary extends into the Haslar Barracks Conservation Area and borders Stokes Bay Conservation Area to the south-west and the Haslar Peninsula Conservation Area, including The Royal Hospital Registered Park and Garden, to the north-east. However, the actual area of development is more limited with impacts predominantly restricted to the currently vacant ground between the Haslar Barracks and the current car park. An expansion of the existing car park is proposed within the south-western part of the application site which introduce a modest change here, but the area show within the Haslar Barracks Conservation Area and extending along Dolphin Way relates to access provisions only and its character and appearance will not change.

2.1.2 The NDNH SoC also takes issues with the restriction of consideration of the HIA to the current development proposals and associated red line boundary, arguing for a cumulative 'continuation of harm' to be considered. The refurbishment works within the existing IRC were informed by a Heritage Impact Assessment (Faithful and Gould 2023) and allowed for the vacant buildings to be brought back in use and good repair as well as improving the aesthetic quality and integration of some of the existing more modern buildings. Positive heritage benefits for the Conservation Area and locally listed buildings can therefore be identified from the initial refurbishment works. The results of the already permitted and undertaken works are the baseline against which the current HIA assesses the current proposals.

### 2.2 Haslar Peninsula Conservation Area

2.2.1 The area of Haslar Peninsula Conservation Area adjacent to the Haslar Barracks Conservation Area includes heritage assets relating to Haslar Hospital and the historic park.

2.2.2 While as noted in by the Principal Conservation and Design Officer in paragraph 2.1 of their PoE it provides an important historic context and wider character for the area, the setting assessment undertaken as part of the Heritage Impact Assessment found that only partial long views were available from the development areas of the site. Within these views there is no contribution made to the significance of the heritage assets as there is no tangible historic association with the site nor does it offer a good location to appreciate the architectural or artistic interest of the assets.

2.2.3 The Principal Conservation and Design Officer notes in paragraph 3.3 of their PoE that the Haslar Barracks Conservation Area is experienced on an approach south-west along Fort Road with the rear of the Grade II listed Haslar Terrace (NHLE 1233482) also in view. This visual connection between the two assets will not be affected. However, the Principal Conservation and Design Officer's PoE does state that there would to be an impact on the setting of the Haslar Peninsula Conservation Area and Haslar Terrace. The principal that

the proposed development would be experienced in views which include the Haslar Barracks and Haslar Peninsula Conservation Areas together is also raised in paragraph 7.5. However, there is no clear discussion of how this would affect the significance of the Haslar Peninsula Conservation Area or Haslar Terrace. Although 'wider negative effects on the Haslar Peninsula and its heritage led regeneration' is cited in paragraph 7.7 there is no articulation or conclusion as how this would occur or of a level of harm. This issue is also present in the NDNH SoC where an effect on the setting of the Registered Park and Garden is automatically equated as harm (paragraphs 105). The presence of the proposed development within views of the assets is not sufficient to cause harm and in my opinion the argument as to how this would result has not been made.

2.2.4 Further discussion on visual impacts within these views is considered by Ms [redacted] in her PoE and rebuttal response.

## 2.3 Stokes Bay Conservation Area

2.3.1 The area of the Stokes Bay Conservation Area that borders the site is characterised by the Scheduled Monument of Font Monkton which is assessed in detail in the Heritage Impact Assessment. The change in the setting of the heritage asset was found to be one of degree rather than kind and the overall character of this part of its setting would not fundamentally change. The site was found not form a part of the asset's setting which contributes to its significance. Key views identified in the Conservation Area Appraisal extend seaward rather than towards the site (Donald Insall Associates 2023, 33). It is considered that the proposed development will have no impact on its significance. No harm has been identified as a result of the development proposals by the Principal Conservation and Design Officer in their PoE or Historic England in their consultation response.

## 2.4 Haslar Barracks Conservation Area

2.4.1 The Principal Conservation and Design Officer in paragraph 2.4 of their PoE identifies the Haslar Barracks Conservation Area as holding national historic interest. This accords with the conclusions of the Heritage Impact Assessment and the Heritage PoE which concludes that it is the historic interest which primarily informs the significance of both the Conservation Area and the locally listed buildings. The buildings themselves have some architectural interest, but this was not sufficient for them to be included on the National Heritage List for England. As highlighted by Historic England in pre-application advice (ref. PA01202212) 'they were always designed to be an enclosed, rather than an outward looking place'. The barracks' enclosed and coherent character as a group of contemporary military structures is the key aspect of the character of the Conservation Area which informs its significance. The buildings themselves are utilitarian and repetitive in design reflecting their military use.

2.4.2 The key points raised in the Principal Conservation and Design Officer's PoE are the height, proximity and design of the proposed development.

2.4.3 The height is described as 'overbearing' and 'incongruous,' however, in my opinion, it has not been clearly expressed how the difference in height between the buildings within the Haslar Barracks Conservation Area and the proposed development would affect the significance of the heritage asset. In heritage terms, as he sets out in paragraph 7.2, it is the contribution of setting to the significance of a heritage asset or the ability to appreciate it which is important. In his description of the aspects of the setting of the Conservation Area which he believes contributes to its significance it is the interrelationship with the other military elements in the wider area, experienced through views along Clayhall Road, Fort Road and Dolphin Way. The visual interconnection between these heritage assets will not be blocked by the proposed development. The height of the development (three storeys as

opposed to the more general two storeys of the properties fronting Fort Road) will not materially change its presence or absence within a streetscene.

2.4.4 While a taller structure can be more visually prominent, the design of the Haslar Barracks does not in my opinion seem to have been designed to be visually dominant and this does not inform either its architectural or historic interests.

2.4.5 The contextual relationship of built form in visual and design terms is addressed by [redacted] in her PoE and rebuttal response.

2.4.6 In terms of proximity, again proximity does not in and of itself lead to harm in heritage terms. The Haslar Barracks are a cohesive group of structures and being able to perceive them as a distinct entity is important to understanding their significance. To this end a degree of separation between the Conservation Area and the proposed development is required. A distance of around 24 m is proposed within the proposals as there is a need to allow for the two parts of the IRC to operate as one. While this separation is described by the Principal Conservation and Design Officer as 'insufficient' (paragraph 5.7) this is again expressed as relating to overbearing and not explicitly linked to heritage interests or the significance of the Conservation Area. The Heritage PoE concluded that the distance would be enough to ensure that the Haslar Barracks Conservation is recognised as a distinct area.

2.4.7 The Principal Conservation and Design Officer has some concerns with the design of the new development, in particular the dining block and CASU (these are keyed as one storey in the submitted plans and so described as such in the Heritage Impact Assessment, though the elevations show an upper level without windows) (paragraph 5.8). Details of the design are also raised by the NDNH SoC (paragraph 91). This is an outline planning application and as such the detail of design and materials will be subject to a reserved matters application.

2.4.8 In their PoE the Principal Conservation and Design Officer states their belief that the proposals have not avoided or minimised harm to the Conservation Area in accordance with the requirement in HE4 of the National Planning Policy Framework (NPPF) (paragraph 6.2). However, it should be noted that Historic England in their consultation response acknowledged that 'the harm has been minimised by moving the proposed buildings away from the barracks, while the design and detailing of the buildings would be dealt with at reserved matters'.

2.4.9 The Principal Conservation and Design Officer also disagrees with the conclusions of the Heritage Impact Assessment and states it is therefore contrary to HE5 of the NPPF (paragraph 6.2). As set out in the Heritage PoE there is a subjective element to assessing setting and the effect of changes on the significance of heritage assets and so some degree of professional disagreement can arise in this regard without an implication that an assessment has been incorrectly performed. The Heritage Impact Assessment has provided a detailed setting assessment in accordance with the. *The Setting of Heritage Assets: historic environment good practice advice in planning note 3* (Historic England 2017). This sets out systematic and staged approach to the assessment of the effects of development, involving identifying the heritage assets affected, understanding their significance, understanding the degree to which setting informs their significance and the effects of the proposed development on significance.

2.4.10 As set out in HE6 in the NPPF substantial weight should be given to the conservation of heritage assets, but where harm would occur this should be weighed against any public benefits of the proposals. The two paragraphs not reproduced by the Principal Conservation

and Design Officer from this section introduce the test of substantial harm and also that there is differing degrees of significance even for nationally recognised heritage assets. While the degree of harm identified by the Principal Conservation and Design Officer is not explicitly set out, they clearly consider this below the level of substantial harm. Though a designated heritage asset, the Haslar Barack Conservation Area which encompasses a group of locally listed assets is considered to hold lower level of significance than a Conservation Area which might contain a number of Listed Buildings.

2.4.11 The Principal Conservation and Design Officer believes that the proposals have not fulfilled the HE9 1b requirement to 'consider the area's special architectural or historic interest (as identified as part of the designation of the conservation area) in the design of development'. I consider that the development proposals mirror the orientation of the military buildings within the Conservation Area and will reflect their use of red brick, plain style and repetitive elements. The detail of the design and materials will be secured at the reserved matters stage. Notwithstanding this, it is not required for the proposals to precisely mimic the design of the barracks. Equally the requirement under HE9 1b is only where development proposals are within or affect the significance of a Conservation Area, a point which is disputed between Principal Conservation and Design Officer and myself.

2.4.12 In their PoE the Principal Conservation and Design Officer quotes the consultation response from Historic England which speculates that the proposed development would be medium-term and might make it more difficult for longer term plans for the site. As set out in the Heritage PoE any prospective future or alternative development is not a heritage concern in itself; the application is required to consider the heritage impacts of the current proposals.

2.4.13 The NDNH SoC contends that the development proposals will affect the intact nature of the barracks (paragraphs 88-90). I do not believe that the cohesive nature and original layout of the barracks would be affected by the adjacent but distinctly separate new buildings. As noted above, in my opinion, sufficient separation has been achieved to ensure the Conservation Area is still viewed as a distinct and contained group of assets.

2.4.14 The NDNH SoC also raises points around access stating that 'the development contradicts the objective of conserving and enhancing the Haslar Barracks Conservation Area by making it more publicly accessible' (paragraph 92-3). Whilst improving public access or interpretation may be an enhancement of a heritage asset (Historic England 2017, 14), the presence or absence of public access does not in and of itself affect the significance of an asset. The current ownership and use of the site obviously restricts its public access and this has been the case for many years as well as being an aspect of its original function. As stated by Historic England and in the HIA, the asset was designed as an enclosed and inwardly focused complex. While there may be aspirations in the Conservation Area Appraisal (Gosport Borough Council 2018) to open up the area (both in terms of access and visual appearance) these are not part of the current planning application and would not be precluded in the future by its consent.

2.4.15 An opinion is expressed in the NDNH SoC that traffic relating to the IRC will result in harm to heritage assets through 'noise, surface erosion and air pollution' (paragraph 97). Whilst tranquillity can be an aspect of the setting of a heritage asset which informs its significance, this is not judged to be the case in respect to the heritage assets in the vicinity of the site.

2.4.16 The landscape and visual impact points (paragraphs 98-103) are addressed by Ms Rachel Williams in her PoE and rebuttal response.

## 2.5 Archaeology

2.5.1 Points in relation to archaeology are covered in the PoE from the Head of Development Management in paragraphs 5.10-12. This acknowledges the Archaeological Desk-Based Assessment and states that mitigation can be archived via a suitably worded planning condition. I concur with this opinion and some further detail on this point and appropriate mitigation is provided in the Heritage PoE.

2.5.2 While archaeology is raised by NDNH SoC (paragraphs 96), it is considered that these matters are dealt with through the Archaeological Desk-Based Assessment and specific heritage statement relating to the Monkton Hutments.

# 3 CONCLUSIONS

3.1.1 Harm to the Haslar Peninsula Conservation Area and the listed Haslar Terrace is stated in the PoE from the Principal Conservation and Design Officer. This assertion appears to rest on the presence of the development proposals in views encompassing these assets and the Haslar Barracks Conservation Area, however the direct visual connection between these assets will not be interrupted. The Heritage Impact Assessment found that the development area was not considered to contribute to their significance and the presence or absence of development within the site is not considered to affect their heritage interests. As such it is not considered that the development proposals would affect the significance the assets and result in harm.

3.1.2 The Principal Conservation and Design Officer finds a degree of harm to the Haslar Barracks Conservation Area. The level of this harm is not articulated but their response suggests they believe this to be less than substantial. The cause of this harm is stated in relation to the height, proximity and design of the development proposals. The Haslar Barracks Conservation Area derive their significance from their historic and architectural interest. The barracks form an enclosed, inward looking and distinct group of assets which is safeguarded through its designation as a Conservation Area. While the Heritage Impact Assessment and Heritage PoE found a degree of separation between the new development and the existing IRC buildings within Conservation Area was important to enable their distinct identity to be seen and understood this has been allowed for within the proposals. The height of the development proposals are relevant only if they would affect the significance of the heritage assets. In this case the barracks were not designed to be visually dominant and the presence of taller structures in the vicinity is not considered to affect their historic or architectural interests. As this is an outline application the detail of design and material will be secured at the reserved matters stage.

3.1.3 While the scheduled Fort Monckton within the Stokes Bay Conservation Area and potential archaeology within the site are also discussed there is no substantive disagreement on these matters.

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# APPENDICES

## Appendix 1: Terminology

*Glossary*

The terminology used in this assessment follows definitions contained within Annex B of NPPF:

| | |
|---|---|
| **Archaeological interest** | There will be archaeological interest in a heritage asset if it holds, or potentially holds, evidence of past human activity worthy of expert investigation at some point. |
| **Conservation (for heritage policy)** | The process of maintaining and managing change to a heritage asset in a way that sustains and, where appropriate, enhances its significance. |
| **Designated heritage asset** | A World Heritage Site, Scheduled Monument, Listed Building, Protected Wreck Site, Registered Park and Garden, Registered Battlefield or Conservation Area designated under the relevant legislation. |
| **Heritage asset** | A building, monument, site, place, area or landscape identified as having a degree of significance meriting consideration in planning decisions, because of its heritage interest. It includes but is not limited to designated heritage assets and assets identified by the local planning authority (including local listing). |
| **Historic environment** | All aspects of the environment resulting from the interaction between people and places through time, including all surviving physical remains of past human activity, whether visible, buried or submerged, and landscaped and planted or managed flora. |
| **Historic environment record** | Information services that seek to provide access to comprehensive and dynamic resources relating to the historic environment of a defined geographic area for public benefit and use. |
| **Setting of a heritage asset** | The surroundings in which a heritage asset is experienced. Its extent is not fixed and may change as the asset and its surroundings evolve. Elements of a setting may make a positive or negative contribution to the significance of an asset, may affect the ability to appreciate that significance or may be neutral. |
| **Significance (for heritage policy)** | The value of a heritage asset to this and future generations because of its heritage interest. The interest may be archaeological, architectural, artistic or historic. Significance derives not only from a heritage asset's physical presence, but also from its setting. For World Heritage Sites, the cultural value described within each site's Statement of Outstanding Universal Value forms part of its significance. |

*Chronology*

Where referred to in the text, the main archaeological periods are broadly defined by the following date ranges:

| **Prehistoric** | | **Historic** | |
|---|---|---|---|
| **Palaeolithic** | 970,000–10,00 BC | **Romano-British** | AD 43–410 |
| **Mesolithic** | 10,000–4000 BC | **Saxon** | AD 410–1066 |
| **Neolithic** | 4000–2400 BC | **Medieval** | AD 1066–1500 |
| **Bronze Age** | 2400–700 BC | **Post-medieval** | AD 1500–1800 |
| **Iron Age** | 700 BC–AD 43 | **19th century** | AD 1800–1899 |
| | | **Modern** | 1900–present day |



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