Haslar IRC expansion
Gosport, Hampshire

Heritage Proof of Evidence of Naomi Brennan on behalf of the Applicant

Document Ref.: 285223.03
Crown Development Application Ref: CROWN/2026/0000005
GBC/LPA Ref: 26/00216/CROWN
October 2026

wessexarchaeology



© Wessex Archaeology Ltd 2026, all rights reserved

Suite 3
Minton House
London Road
Amesbury
SP4 7RT

www.wessexarch.co.uk

Wessex Archaeology Ltd is a company limited by guarantee registered in England, company number 1712772. It is also a Charity registered in England and Wales number 287786, and in Scotland, Scottish Charity number SC042630. Our registered office is at Portway House, Old Sarum Park, Salisbury, Wiltshire, SP4 6EB.

Disclaimer
The material contained in this report was designed as an integral part of a report to an individual client and was prepared solely for the benefit of that client. The material contained in this report does not necessarily stand on its own and is not intended to nor should it be relied upon by any third party. To the fullest extent permitted by law Wessex Archaeology will not be liable by reason of breach of contract negligence or otherwise for any loss or damage (whether direct indirect or consequential) occasioned to any person acting or omitting to act or refraining from acting in reliance upon the material contained in this report arising from or connected with any error or omission in the material contained in the report. Loss or damage as referred to above shall be deemed to include, but is not limited to, any loss of profits or anticipated profits damage to reputation or goodwill loss of business or anticipated business damages costs expenses incurred or payable to any third party (in all cases whether direct indirect or consequential) or any other direct indirect or consequential loss or damage.

Document Information

Document title	Haslar IRC expansion, Gosport, Hampshire
Document subtitle	Heritage Proof of Evidence of [redacted] on behalf of the Applicant
Document reference	285223.03
Client name	AtkinsRéalis PPS Limited
Address	3rd Floor White Building 1-4 Cumberland Place Southampton SO15 2NP
On behalf of	The Home Office
Planning reference	Crown Development Application Ref: CROWN/2026/0000005 GBC/LPA Ref: 26/00216/CROWN
Project management by	[redacted]
Document compiled by	

Quality Assurance

Issue	Date	Author	Approved by
1	12/10/2026	NB	[redacted] MDT
2	19/10/2026	NB	[redacted] MDT
3	19/10/2026	NB	[redacted] MDT

Contents

Summary ..... *ii*

1 INTRODUCTION **1**
1.1 Project background 1
1.2 Scope of document 1
1.3 Qualifications and experience 1

2 LEGISLATION AND POLICY CONTEXT **2**
2.1 Introduction 2
2.2 Commentary 3

3 PREVIOUS ASSESSMENT **4**
3.1 Introduction 4
3.2 Summary of conclusions 5

4 SUMMARY OF RELEVANT CONSULTATION RESPONSES **6**
4.1 Gosport Borough Council 6
4.2 Historic England 7

5 SUMMARY OF CASE **7**
5.1 Haslar Conservation Area 7
5.2 Archaeology 9

6 CONCLUSION **10**

BIBLIOGRAPHY **11**

APPENDICES **12**
Appendix 1: Terminology 12

Summary

This proof of evidence has addressed the potential impact of the scheme on the significance of Haslar Conservation Area and below ground archaeological remains. With regard to the first issue, while the consultee responses from Gosport Borough Council and Historic England believe that some harm may occur due to the height, location and design of the proposed development, in my professional opinion there will be no harm to the historic and architectural interests of the Conservation Area arising from the change to its setting. The detail of design and materials can be secured and addressed through reserved matters. The proposed location of the new buildings has provided a visual separation with the Conservation Area, allowing for the distinct identity of the barracks to be maintained, while allowing for the operational connection between them and the existing IRC to be maintained.

There is agreement that the archaeological potential of the application site is limited and potential impacts low, with modern made ground recorded as overlying the area of development. As a result, a mitigation approach comprising education alongside a finds reporting protocol rather than active monitoring has been proposed.

Haslar IRC expansion
Gosport, Hampshire

Heritage Proof of Evidence

1 INTRODUCTION

1.1 Project background

1.1.1 Wessex Archaeology was 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); and
- Heritage Impact Assessment (Wessex Archaeology 2026b, ref. 285223.02).

1.2 Scope of document

1.2.1 My evidence addresses heritage issues, primarily the potential impact on the Haslar Conservation Area which is the main point in relation to heritage raised by the consultees.

1.2.2 The purpose of this proof of evidence is to present expert evidence that summarises:

- relevant local and national planning policy in relation to heritage;
- the significance of the affected assets; and
- the effect of the proposals on that significance.

1.2.3 This information is then considered alongside the relevant consultee responses responding to the points raised.

1.3 Qualifications and experience

1.3.1 This document has been prepared by Naomi Brennan, BSc (hons), ACIfA. I am a Principal Heritage Consultant at Wessex Archaeology and have acted as the project manager on the Haslar IRC project from 2023 to 2026. In this role I have overseen and provided quality

assurance on the reports produced, provided technical advice and support on the project and liaised with key consultees.

1.3.2 I have worked in the heritage sector since 2004 and have over ten years' experience as a senior heritage consultant. I have researched and prepared numerous Environmental Impact Assessments, heritage statements and desk-based assessments for both small-scale developments and large infrastructure projects. I also project manage and oversee the production of heritage statements and desk-based assessments for a wide range of developments. Recent projects include on-going heritage and archaeology support for the Southsea Coastal Defence Scheme, a 4.5 km scheme extending from Old Portsmouth to Eastney.

1.3.3 The evidence which I have prepared and provide in this proof of evidence is true and has been prepared, and is given, in accordance with the guidance of my professional body and I confirm that the opinions expressed are my true and professional opinions.

2 LEGISLATION AND POLICY CONTEXT

2.1 Introduction

2.1.1 The *Planning (Listed Buildings and Conservation Areas) Act 1990* provides specific protection for buildings and areas of special architectural or historic interest. It provides for the designation of areas as Conservation Areas due to their *special architectural or historic interest the character or appearance of which it is desirable to preserve or enhance*. Where proposals may affect a Conservation Area, Section 72 (1) places a duty upon decision-makers to have special regard to *the desirability of preserving the character or appearance of that area*. While setting is not explicitly protected under the 1990 act it is generally understood that changes to the wider area may affect the character of a Conservation Area. The National Planning Policy Framework (NPPF) is clear that the setting of a designated heritage assets (including a Conservation Area) can contribute to significance and impacts to significance through changes to the setting of a Conservation Area should be considered.

2.1.2 At the time of the submission the 2024 version of the National Planning Policy Framework was in effect where policies for conservation and enhancing the historic environment are set out in Chapter 16. The references used throughout the reports and the consultee responses refer to this version.

2.1.3 A new version of NPPF was issued in August 2026 (MHCLG 2026). The wording of this version, whilst changed in layout, does not affect the criteria relating to assessing effects on the significance of heritage assets, nor does it change the weight, as expressed in the current version, to be given in the planning balance.

2.1.4 Overall these policies recognise that heritage assets are an irreplaceable resource and should be conserved in a manner appropriate to their significance. Within planning applications the significance of any heritage assets affected, including any contribution made by their setting, should be established. In determining applications local planning authorities need to understand and weigh up the significance of an asset and the extent of the impact (both positive and negative). For applications that directly or indirectly affect non-designated heritage assets, a balanced judgement will be required with regard to the scale of any harm or loss and the significance of the heritage asset.

2.1.5 The application site lies within local authority area of Gosport Borough Council. The relevant local planning policies from the current local plan (Gosport Borough Local Plan, 2011 – 2029) are:

- LP11: Designated Heritage Assets including Listed Buildings, Scheduled Ancient Monuments and Registered Historic Parks & Gardens
- LP12: Designated Heritage Assets: Conservation Areas
- LP13: Locally Important Heritage Assets

2.1.6 Within the emerging new local plan (Gosport Borough Local Plan, 2042) the relevant polices are:

- D10: Historic Environment
- DE4: Designated Heritage Assets
- DE5: Conservation Areas
- DE16: Locally Important Heritage Assets

2.1.7 The policies from the emerging plan largely reflect the wording of the previous policies with some text removed which largely repeats the principles set out in NPPF. The exception is the new D10 Historic Environment policy which provides more of an overarching strategy from the Gosport Borough Council as to the measures it will take to preserve and enhance the historic environment.

2.2 Commentary

2.2.1 Whilst the statutory duties in respect of s66 of the *Planning (Listed Buildings and Conservation Areas) Act 1990* lie with the decision makers, it is noted here that the development proposals have sought to position the new buildings away from the Conservation Area within the constraints of maintaining the effective operational connection between the two areas.

2.2.2 The National Planning Policy Framework provides the most detailed policies in relation to the historic environment, the wording and meaning of which are reflected and echoed in the relevant local planning policies.

2.2.3 NPPF requires the applicant to provide information with a planning application on the significance of aspects of the historic environment (known and potential) which may be affected by the proposals and to assess those impacts (HE5). This includes how changes to the setting of heritage assets may affect their significance. This was undertaken through the Archaeological Desk-Based Assessment and Heritage Impact Assessment which was undertaken in accordance with the relevant standards and guidance.

2.2.4 There is a desirability for sustaining and enhancing the significance of heritage assets (HE4), and a principle that substantial weight should be given to the conservation of an asset (HE6, 1). However, whatever the level of harm, the NPPF acknowledges a proportionate approach should be used, based on the significance of the asset. Though HE 6, 3 explains that any harm will be a matter of considerable importance and weight.

2.2.5 Where less than substantial harm is identified to a designated asset then this harm should be weighed against the public benefits of the proposals (HE6, 4). Any impacts on the Conservation Area should therefore be considered as part of the overall planning balance.

2.2.6 In accordance with HE10 the investigation, recording and reporting of any archaeological remains within the Site can be secured by a planning condition.

2.2.7 The requirement to conserve or enhance the character and appearance of Conservation Areas is reflected in the local planning policies. The setting of Conservation Areas is addressed in LP12 2.b)/ DE5 1.b) though changes and impacts have not been explicitly linked to the significance of the asset or its special character or appearance. Policy D10 notes the significance contribution that Gosport's military history makes to the historical, architectural and archaeological interests of the town but the principle of seeking to conserve or enhance this is no different to the obligation under NPPF for all aspects of the historic environment.

3 PREVIOUS ASSESSMENT

3.1 Introduction

3.1.1 An archaeological desk-based assessment (Wessex Archaeology 2026a) was prepared to consider potential impacts to the archaeological resource. This was an updated version of a report previously prepared for the initial phase of development. The desk-based assessment was also informed by a heritage statement which was prepared following consultation with the planning archaeologist for Gosport Borough Council, and assesses the significance of the 20th century Monckton Hutments which were formerly situated within the application site in greater detail (Wessex Archaeology 2024).

3.1.2 A heritage impact assessment (Wessex Archaeology 2026b) was undertaken to identify any heritage assets (with the exception of buried archaeological remains) likely to be affected by the proposed development, including any contribution made by their setting.

3.1.3 The reports consulted a number of sources in preparation of the assessment these including:

- National Heritage List for England (NHLE);
- Hampshire Historic Environment Record (HHER);
- Historic maps including Ordnance Survey and tithe mapping; and
- Observations made during the site visits (September 2023, October 2025).

3.1.4 It was also undertaken in accordance with a number of key guidance documents including:

- *Standard and guidance for historic environment desk-based assessment* (CIfA 2014, revised 2020);
- *Managing Significance in Decision-Taking in the Historic Environment: historic environment good practice advice in planning note 2* (Historic England 2015);
- *Statements of Heritage Significance: analysing significance in heritage assets* (Historic England 2019); and

- *The Setting of Heritage Assets: historic environment good practice advice in planning note 3 (GPA3)* (Historic England 2017).

3.2 Summary of conclusions

Archaeological desk-based assessment

3.2.1 The Archaeological Desk-Based Assessment (Wessex Archaeology 2026a) established that there is an archaeological interest within the site. This was defined as the potential for the presence of buried archaeological remains related to 19th and 20th century military installations to be present.

3.2.2 The detailed assessment of the Monckton Hutments found that they are unlikely to have left any substantial archaeological remains and that their archaeological interest is limited, with their significance largely deriving from their documented history.

3.2.3 Ground investigation works have identified between 0.80-1.6 m of modern made ground and an archaeological watching brief already undertaken within the existing IRC did not locate any significant archaeological remains. This would seem to indicate that there is only a low potential for buried archaeological remains to be located within the application site and for the proposed development to result in harm to any archaeologically significant remains.

3.2.4 It was concluded that any adverse impact to buried archaeological features as a result of the implementation of the development proposals would be permanent and irreversible in nature. However, this potential adverse effect could be reduced through the implementation of an appropriate scheme of archaeological mitigation.

3.2.5 An Archaeological Mitigation Strategy has been produced by Wessex Archaeology (Wessex Archaeology 2025) in consultation with the planning archaeologist for Gosport Borough Council. Due to the low potential for any significant remains to be present, a formal archaeological watching brief was not recommended. Instead, construction personnel would receive a toolbox talk on the archaeological potential of the site prior to the start of groundworks, and a finds reporting protocol would be established to provide guidance on recognising, reporting and responding to any archaeological material that may be encountered.

Heritage impact assessment

3.2.6 The Heritage Impact Assessment (Wessex Archaeology 2026b) identified that the proposed development would have no direct, physical impacts on any designated heritage assets.

3.2.7 During pre-application consultations with Historic England, Haslar Conservation Area and Fort Monckton Scheduled Monument were identified as assets which the proposed development might impact through a change in their setting.

3.2.8 The significance of Fort Monckton and its associated listed buildings derive from its archaeological and architectural interest. The setting assessment found that the site does not form a part of the asset's setting which contributes to its significance. This was due to a lack of architectural or appreciable historic association with Fort Monckton and the lack of legibility of the fort's significance from within the site. Furthermore, the scale of the proposed development is such that any long views from the fort which add to the ability to appreciate its connection to Portsmouth Harbour or other contemporary defences, would not be impacted. It was concluded that the proposed development would therefore have no impact on the significance of Fort Monckton Scheduled Monument.

3.2.9 The site lies adjacent to the Haslar Barracks Conservation Area. A number of the surviving 19th century structures within the barracks are locally listed, but do not meet the criteria for formal national listing. The significance of the Conservation Area is derived from the special architectural and historic interests of its component elements comprising the Locally Listed Buildings contained within it, and aspects of the spaces and built elements surrounding and connecting them. The application site was assessed as making a limited contribution to its significance, as views from the site towards the Conservation Area allow for the appreciation of the enclosed nature of the barracks and some appreciation of the significance of the Locally Listed Buildings within it. The assessment found that the landscaped buffer between the proposed accommodation blocks and the Haslar Barracks Conservation Area would provide sufficient visual separation of these two elements. Similarly, the proposed fencing would not impact the significance of the barracks and would result in a very minor visual change given the presence of the existing 5.2 m high fencing. Furthermore, the proposed development would ensure the continued maintenance of the Locally Listed Buildings within the Haslar Barracks Conservation Area. This assessment has therefore found that the proposed development would result in no harm to the significance of the Conservation Area.

3.2.10 The Heritage Impact Assessment was shared with the Inspector of Ancient Monuments, who had provided the pre-application comments. They did not offer a detailed response but felt that the previous pre-application response was still relevant. They also noted that 'given the potential impact on the Conservation Area is likely to be modest we would defer to Gosport BC going forward' (pers. comm. 09.01.26). The report was also shared directly with the Conservation Officer at Gosport Borough Council.

4 SUMMARY OF RELEVANT CONSULTATION RESPONSES

4.1 Gosport Borough Council

4.1.1 The report from the regulatory board includes the following concern:

The Council has very strong concerns, given the height and scale necessary to achieve the quantum of development proposed in the application, about the harmful impact on the setting of a number of adjacent designated heritage assets, in particular the Haslar Barracks Conservation area and the Listed Buildings and park at the former Royal Hospital Haslar.

4.1.2 Heritage and design are considered together in section 4.3. The key points raised are the proximity of the buildings to the Haslar Barracks Conservation Area and their height, scale and appearance, stating an opinion that 'the elevations and site plan show a group of large buildings of a starkly utilitarian design lacking architectural merit and of a size and proximity to cause harm to the adjacent Conservation Area' (para 4.3.3). They refer to the *Haslar Barracks Conservation Area Appraisal* (Gosport Borough Council 2018) which includes the principle that 'any development would need to have regard to the context of the Barracks site to ensure it would not be overbearing in form or harm its setting'. The size and scale of the buildings, described as out of keeping with the area, is described as the overriding issue (para 4.3.7).

4.1.3 While the separation between the Conservation Area and the development proposals is described as insufficient (para 4.3.6) it is later admitted that the location is likely to be necessary as the application would operate alongside the existing IRC buildings (para. 4.3.9).

4.1.4 Archaeology is addressed in paragraphs 4.3.10-12 where the comprehensive Archaeological Desk-Based Assessment is commended and the conclusions broadly

agreed with. The response agrees that the archaeological potential is reduced and its mitigation could be secured through a planning condition.

4.1.5 While design is a not purely heritage matter the design detailing is highlighted in paragraph 4.3.13 as being considered not in keeping with nearby heritage assets.

4.1.6 Although not discussed within the heritage and design section in the conclusion it is stated that there are concerns about harmful impacts on the setting of the designated historic assets at the former Royal Hospital Haslar (para. 5.2); though no further details are given.

4.1.7 The wording of the regulatory board report is repeated in the response from Gosport Borough Council dated 06.08.26.

4.2 Historic England

4.2.1 The response from Historic England (22.07.26) confirms that only one designated heritage asset would be materially affected, namely the Haslar Barracks Conservation Area.

4.2.2 It notes the historic and architectural interest of the barracks expressing the view that 'the early 19th century had a strong tradition or [sic] design and craftsmanship that meant that even simple, functional buildings such as these were, in a quiet way, beautiful'. However, it does conclude that the existing high fencing makes it 'almost impossible' to appreciate the architectural interest of the barracks and that 'their setting is already poor'. Concluding that 'these proposals would not greatly harm the significance of the barracks when viewed in very narrow terms'. It also concedes that 'the harm has been minimised by moving the proposed buildings away from the barracks'.

4.2.3 The wording of the response suggests an opinion that the term utilitarian is being used in relation to development proposals as a synonym for ugly and expresses the opinion that the final design and materials would be cheap and of poor quality. However, they acknowledge that 'the design and detailing of the buildings would be dealt with at reserved matters'.

4.2.4 The final point raised is around the future use of the site with an expectation that the development proposal might make a long-term redevelopment for residential use more challenging.

5 SUMMARY OF CASE

5.1 Haslar Conservation Area

5.1.1 Setting is:

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. (NPPF Annex B)

5.1.2 Changes in the surroundings of a heritage asset do not need to be assessed for the harm to the setting itself, but rather for the effect of the changes on the on the interests from which the significance of the heritage asset is derived. For this reason the guidance from Historic England makes it clear that 'its importance lies in what it contributes to the significance of the heritage asset or to the ability to appreciate that significance' (Historic England 2017,

4). The effect of a change on the setting of a heritage asset is not determined by proximity or level of visual affect. It relates as to how the changes affect the significance of the asset.

5.1.3 The Heritage Impact Assessment undertook a setting assessment with regard to the guidance in *The Setting of Heritage Assets: historic environment good practice advice in planning note 3 (GPA3)* (Historic England 2017). As part of this this an initial scoping exercise was undertaken where several designated heritage assets in the vicinity of the site, including those at the Royal Hospital Haslar were considered, but were then concluded to not likely to be affected by the proposals. Despite the brief mention of the Royal Hospital Haslar in the response from Gosport Borough Council, it does seem to be agreed by the Gosport Borough Council and Historic England that it is potential impacts to the setting of Haslar Conservation Area which are the point of concern.

5.1.4 As per the guidance from Historic England the significance of the asset needs to be understood in order to assess when any changes to its setting will affect that significance. As identified in the Heritage Impact Assessment and the response from Historic England the significance of the Locally Listed Buildings relates to their historic and architectural interest. In my professional opinion it is their historic interest which primarily informs their significance and the lesser importance of their architectural interest is reflected in their ineligibly for formal national listing. The Conservation Area allows for the protection of the setting of the individual buildings and allows for their group association to be appreciated.

5.1.5 As noted by Historic England in earlier pre-application advice (28.11.24, ref. PA01202212; includes as Appendix 5 of the Heritage Impact Assessment) the openness of the development area ‘is not necessary to appreciate the barracks’ significance, given that they were always designed to be an enclosed, rather than an outward looking place’. It is whether the siting and design of the buildings would in some way affect the special character and appearance of the Conservation Area. The key concern raised by both Gosport Brough Council and Historic England is whether the new development would be ‘overbearing’ and ‘not in keeping’ with the adjacent character.

5.1.6 On the issue of overbearing, it is in my professional opinion key for the coherence and distinct identity of the barracks to be maintained; they need to be perceived as the enclosed and associated group of assets which they are. Given this there needs to be a clear separation with the new development proposals and this (within the confines of operational needs) has been achieved. I do not believe that the height of the proposals in and of itself creates an adverse effect in heritage terms. The development proposals may be more visually dominant but as the small, enclosed and modest Haslar Barracks does not seem to have been designed to be visually prominent, visual dominance does not in my opinion inform either its architectural or historic interests.

5.1.7 The architectural style of the buildings is accurately described as utilitarian meaning that their function dictates their form. This reflects their military character and status with a repetition of detailing and materials as well as a prioritisation of practical design over ornamentation. My use of this term is not to express any value judgement of the beauty or lack thereof of in this style. The height, scale, massing and design of the development proposals are relevant only in so far as they might affect the significance of the asset. While there may be wider considerations beyond heritage for design, a similarly utilitarian style and use of materials does not in my opinion conflict or detract from the architectural interest of the Conservation Area. As noted in the consultee responses this is an outline application and the exact materials and detailing can be addressed and secured at reserved matters stage.

5.1.8 The Heritage Impact Assessment did not, for the reasons articulated above, find any harm from the development proposals on the significance of the Conservation Area. In this judgement there is disagreement with the responses from Historic England and Gosport Borough Council which find a degree of harm. While neither response clearly sets out a level of harm it can be assumed that this is defined as less than substantial as both reference an ability to offset this with public benefits. Having made the judgment that harm would occur I believe that the consultees need to more precisely define the level of harm to enable a determination of the planning balance to be made.

5.1.9 There is a subjective element to assessing setting and the effect of changes on the significance of heritage assets. Some degree of professional disagreement can arise in this regard and there is no clear scale for defining and categorising the degree of perceived harm beyond the substantial harm threshold as set out in NPPF. Notwithstanding this, in my professional opinion there is no harm to the significance of the Haslar Barracks and I do not think that the consultees have clearly made the arguments as to why the historic and architectural interest of the Conservation Area and the associated locally listed assets would be harmed.

5.1.10 While there are future aspirations for the redevelopment of the site for housing the current application should be determined based on the current proposals and its accordance with planning policy. 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 and, in my view, they do not cause any harm in heritage terms.

5.1.11 Subsequent to the submission of the Heritage Impact Assessment, it has been confirmed that due to the design flood level and associated mitigation that the fixed floor level would be at 5.24 m aOD with the 12 m building height up from this level. As a result, the overall building heights will be taller than 12 m. However, as set out above, in my opinion the height of the proposed structures is not in itself an issue that would affect the significance of the Conservation Area.

5.2 Archaeology

5.2.1 There is agreement between the Archaeological Desk-Based Assessment and Gosport Borough Council that, while there is known 19th and 20th century military activity within the site, the potential for buried archaeological remains to be impacted by the proposal is low. This is due to the presence of between modern made ground (as mapped by ground investigations), the fact that no archaeologically significant remains were identified during the watching brief at the existing IRC and a general low potential for below ground remains relating to the known military activity to survive as below ground remains.

5.2.2 The comments from Gosport Borough Council suggest there may be some confusion of the detail of the mitigation strategy proposed. The Archaeological Mitigation Strategy (Wessex Archaeology 2025) and its approach was discussed and agreed with the archaeological advisor to Gosport Borough Council. However, since this time there has been a change of personnel and as a result some of the awareness of these discussions may have been lost. Due to the overlying modern made ground and low potential for the construction groundworks to impact on significant archaeological remains, a mitigation approach comprising education alongside a finds reporting protocol rather than active monitoring was proposed. A planning condition to secure this archaeological mitigation may need to depart from the normal *pro-forma* wording used for an archaeological watching brief.

6 CONCLUSION

6.1.1 In undertaking this proof of evidence I have reviewed the reports and the assessment work undertaken in relation to the proposed Haslar IRC expansion and I am confident in their conclusions. The assessments undertaken and the conclusions drawn are in accordance with the relevant guidance from CIfA and Historic England and reflect current national and local planning policies in relation to heritage. There is some disagreement in relation to Haslar Conservation Area between myself and the consultees. My findings are that the proposals will not affect the significance of the Conservation Area, with the historic and architectural interest of the assets unaffected. Both Gosport Borough Council and Historic England have identified some harm, but this is believed to be less than substantial. I believe this difference falls within the realm of professional judgement. If harm is judged likely to occur then this can be balanced against the other benefits of the scheme.

BIBLIOGRAPHY

Chartered Institute for Archaeologists 2014 (revised 2020). *Standards and guidance for historic environment desk-based assessment* https://www.archaeologists.net/work/standards.

Gosport Borough Council 2015. *Gosport Borough Local Plan 2011-2029*. Available online: https://www.gosport.gov.uk/media/1210/Local-Plan-2011-2019-Written-Statement/pdf/Gosport_Borough_Local_Plan_2011-2029_-_adopted_version_b.pdf?m=636971633273370000

Gosport Borough Council 2018. *Haslar Barracks Conservation Area Appraisal*. Available online: https://www.gosport.gov.uk/media/2353/Haslar-Barracks-Conservation-Area/pdf/Haslar_Barracks_Conservation_Area_Appraisal_Mar_2018.PDF?m=637267926138700000

Gosport Borough Council 2021. Gosport Borough Local Plan 2042 (Submission Version). Available online: https://www.gosport.gov.uk/media/7468/Submission-Gosport-Borough-Local-Plan-2042/pdf/Submission_Gosport_Borough_Local_Plan_2042.pdf?m=1790936033363

Historic England 2015. *Managing Significance in Decision-Taking in the Historic Environment: historic environment good practice advice in planning note 2.* https://historicengland.org.uk/images-books/publications/gpa2-managing-significance-in-decision-taking/.

Historic England 2017. *The Setting of Heritage Assets: historic environment good practice advice in planning note 3*. http://historicengland.org.uk/images-books/ publications/gpa3-setting-of-heritage-assets/.

Historic England 2019. *Statements of Heritage Significance: analysing significance in heritage assets.* https://historicengland.org.uk/images-books/publications/statements-heritage-significance-advice-note-12/.

Ministry of Housing, Communities and Local Government [MHCLG] 2026. *National Planning Policy Framework: plan-making and national decision-making policies*. https://www.gov.uk/guidance/national-planning-policy-framework

Planning (Listed Buildings and Conservation Areas) Act 1990. https://www.legislation.gov.uk/ukpga/1990/9/contents .

Wessex Archaeology 2024. *Haslar IRC, Gosport, Hampshire: Monkton Hutments Heritage Statement*. Salisbury: unpublished report, ref. 285220.5.

Wessex Archaeology 2025. *Haslar IRC, Phase 2 Gosport, Hampshire: Archaeological Mitigation Strategy*. Unpublished report ref: 285223.01

Wessex Archaeology 2026a. *Haslar IRC, Gosport: Archaeological Desk-Based Assessment.* Unpublished report, ref. 285220.01.

Wessex Archaeology 2026b. *Haslar IRC expansion, Gosport, Hampshire: Heritage Impact Assessment*. Unpublished report ref: 285223.02

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



Wessex Archaeology Ltd registered office Portway House, Old Sarum Park, Salisbury, Wiltshire SP4 6EB
Tel: 01722 326867 Fax: 01722 337562 info@wessexarch.co.uk www.wessexarch.co.uk

Wessex Archaeology Ltd is a company limited by guarantee registered in England, No. 1712772 and is a Registered Charity in England and Wales, No. 287786;
and in Scotland, Scottish Charity No. SC042630. Registered Office: Portway House, Old Sarum Park, Salisbury, Wilts SP4 6EB.