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:
The Home Office

CD 3.13 Proof of Evidence

PINS Reference Number:
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1. Introduction

Witness and Qualifications

1.1. I am [redacted] of Ubu Design Ltd. I hold a BA (Hons) degree in Horticulture, a Post Graduate Master of Landscape Design (MA) and a Post Graduate Diploma of Urban Design (Dip UD). I have been a Chartered Member of the Landscape Institute (CMLI) since 1998. I have also undertaken a Certificate in Environmental Impact Assessment (Procedures and Process).

Professional Practice

1.2. I have been a practising Landscape Architect and Urban Designer for over 25 years, both in public and private practice. Since 2014, I have worked with UBU Design, focusing primarily on projects that require specialist input on landscape planning matters. This has included numerous schemes of various scales, including sites within local and national landscape designations.

1.3. I specialise in producing Landscape and Visual Appraisals, Landscape and Visual Impact Assessments, and Townscape and Visual Impact Assessments, as well as landscape masterplanning and strategy. I have produced numerous such assessments over the last 15 years, have been involved in the evaluation of many more prior to that, and have worked on a wide range of projects, including large scale projects involving producing Landscape Chapters for Environmental Statements through to general landscape masterplanning and design.

Project Involvement

1.4. Ubu Design Ltd were commissioned by Faithful + Gould for The Home Office in September 2023 to produce a Landscape and Visual Impact Assessment (LVIA) in respect of redevelopment and expansion at Haslar Immigration Removal Centre (IRC), Gosport, of which I was the author. They were subsequently commissioned by AkinsRealis acting on behalf of The Home Office in September 2025 to update the LVIA to accompany an outline application in respect of the expansion at Haslar IRC, of which I was also the author.

1.5. The LVIA commission was to identify the baseline conditions of the site and to ascertain the potential effects on the landscape character and visual amenity should a proposed development be brought forward on the site. At the time of assessment, the principle of the proposed development was considered, and potential mitigation that could be implemented to offset or reduce any identified potential effects.

1.6. Subsequently, Ubu Design Ltd were instructed to provide landscape and visual impact evidence to support the Public Inquiry in respect of the proposed development at Haslar IRC.

Scope of Evidence

1.7. The scope of this Proof of Evidence is to deal with the landscape and visual impact issues associated with the site. In preparing my evidence I have considered the following documents:

- Haslar Immigration Removal Centre Expansion LVIA

1.8. This list is not exhaustive. Matters of Planning and Policy are principally addressed by Mr Mark Jackson.

Declaration

1.9. I declare that the evidence which I have prepared and provide for this Appeal is in accordance with the guidance of the Landscape Institute and I confirm that the opinions expressed are my true and professional opinions.

Planning Application

1.10. This Public Inquiry relates to an outline planning application for expansion of the Immigration Removal Centre, with all matters, excluding access, reserved for future consideration.

2. Site Description

2.1. The site is located on the south-eastern side of Gosport, to the east of Fort Road, and is centred on SZ 6147 9824. The site is approximately 4.54 hectares in size.

2.2. The site comprises developed and undeveloped land. It includes a route through the existing Haslar IRC to the north, improved grassland to the centre of the site, and rough scrubland and an informal public car park to the south.

2.3. The north-eastern boundary adjoins the main Haslar IRC, with the access passing through the IRC and connecting to Dolphin Way. The northern section of the north-western boundary of the site adjoins Fort Road, while the southern section of this boundary adjoins the rear garden boundaries of a row of dwellings; the south-eastern boundary adjoins the coastline along the Solent and the south-western boundary adjoins Gosport and Stokes Bay Golf Club and MOD Fort Monckton. Site boundaries are fenced and generally unvegetated to the northern and central sections, while the south-western boundary with the golf club is vegetated.

2.4. A residential area lies to the west, beyond Dolphin Way to the north-east lies The Royal Hospital, Haslar and east across the Solent, the coastline of Southsea is visible.

2.5. Access to the Haslar IRC is currently from Dolphin Way (a private road which connects to Fort Road) while access to the public car park in the south-western part of the site is from Military Road, just off Fort Road. The England Coast Path, a long-distance footpath (permissive path), passes through the public car park and scrubland on the southern side of the site.

2.6. The site and surrounds have a transitional character with residential character to the west and the more utilitarian character of Haslar IRC immediately north. Buildings, walls and fencing provide some enclosure, though the main site area is relatively open. To the south and west of the car park area, tree cover provides greater enclosure.

2.7. The site is broadly level lying at around 5m AOD. There is a very gentle slope running from the south-western side down towards the northern end of the site.

2.8. The site lies immediately to the south of the Haslar Barracks Conservation Area, which covers the Haslar IRC. The site access crosses through this Conservation Area. The site is not within any landscape or environmental designation and does not contain any historic designations. There are no public rights of way that cross the site. The entire site lies within the boundary of the urban area of Gosport.

3. The LVIA

The Submitted LVIA

3.1. I have been involved in the Public Inquiry application since September 2025, and I am the author of the LVIA for the Public Inquiry Scheme (CD 3.13) that was submitted as part of the outline planning application. I have reviewed and stand by the preparation and findings of that work in preparing this Proof, which should be read together with this Proof.

3.2. Sections 4 and 5 of this Proof provide an overview of the findings of the LVIA.

Development Amendment

3.3. The FFL of the development proposal has been recently revised, as agreed with the Environment Agency (EA). The design flood level is 4.64 metres above Ordnance Datum (AOD). With a +600mm freeboard allowance (as agreed with EA), this equates to a revised FFL of 5.24m AOD. The building would be up to 12m from this level.

3.4. This additional 600mm to the proposed height of the buildings is likely to marginally increase the visibility of the development shown in the Zone of Theoretical Visibility (ZTV) and marginally increase views of the upper levels of the tallest buildings, from the limited close range views where they are visible. However, this will not materially affect the landscape effects and is not likely to materially affect the visual effects or the LVIA conclusions overall.

4. Landscape Character, Sensitivity and Effects

Landscape Character

4.1. The site lies within the 9f Gosport and Fareham Landscape Character Area (LCA). The Coastal Plain Open Landscape Type covers the car park and adjacent rough scrub/grassland area in the south of the site, but the remainder of the site is classified as urban settlement and is not covered by a Landscape Type. The LCA evaluation identifies that the area has a low-lying landscape which forms part of the coastal plain, strongly influenced by urban development and defence infrastructure.

Landscape Effects: Gosport and Fareham Coastal Plain LCA in the Vicinity of the Site

4.2. The application site lies within the south-eastern boundary of the 9f Gosport and Fareham Coastal Plain landscape character area (LCA). The landscape within the vicinity of the site is a relatively flat, low-lying area situated within the edge of an urban area beside the Solent coastline. The area has a varied mix of suburban development, the enclosed site of the Haslar IRC, historic naval development further to the north, Fort Monckton and open space of conservation significance to the south-west, and open views on the coastline across to Southsea.

4.3. Within the LVIA, the sensitivity of the Gosport and Fareham LCA in the vicinity of the site is judged to be medium due to the balance of judgements of landscape value and susceptibility to change of medium and medium-low respectively, which are reflective of the overall quality and condition of the LCA in the vicinity of the site.

4.4. The site landscape comprises predominantly improved grassland enclosed by security fencing in the central section. In the south-western part of the site, the public car park is surfaced with tarmac, with an area of rough scrub and grassland vegetation between the car park and the coastline. To the south-east is the coastline with views across the Solent. The built form of Haslar IRC to the north-east of the site is utilitarian with little vegetation, while the suburban area of Clayhall adjoins the site to the north-west.

4.5. The proposed development would involve the removal of some of the grassland vegetation to accommodate the proposed built form and associated infrastructure. The main buildings of the proposal would provide an extension to the existing Haslar IRC development into the site, which echoes the character and geometric layout of the existing enclosed historic development. The orientation and location of the taller blocks perpendicular to the coastline and set back from the south-eastern boundary, would also minimise visual intrusion in views from the sea and the Southsea coastline. The proposed development is located set back a considerable distance from Fort Road, so will cause minimal change to the character of this road.

4.6. Overall, the wider character of the area would remain intact with the general characteristics not materially altered by the proposed extension and enlarged, more urban car park.

4.7. The LCA in the vicinity of the site was assessed in the LVIA as undergoing a medium-small magnitude of change at the post construction stage with a moderate-minor adverse significance of effect.

4.8. A landscape framework would help to embed the proposals within the local landscape and increase the biodiversity value of the site. In residual terms, the Gosport and Fareham Landscape Character Area in the vicinity of the site was assessed as having a reduced magnitude of change to small and a residual landscape effect of minor adverse as a result of benefits from maturing planting, which is not a significant effect.

Landscape Effects: Application Site Landscape Features

4.9. The application site landscape features comprise grassland in the central and southern sections of the site, some scrub and hedgerow vegetation and a limited number of trees along the boundary of the car park area. The site landscape features, principally grassland, are considered to have a medium-low sensitivity to change, deriving from the balance of landscape value and susceptibility to change.

4.10. Much of the grassland, scrub vegetation at the periphery of the car park area, and a small number of trees within the existing car park area will be removed, to facilitate the proposed development.

4.11. A 2 metre wide buffer is proposed along the south-western boundary, between the site boundary and the re-aligned coastal path, allowing existing hedgerow to be retained and new hedgerow to be planted where gaps exist.

4.12. Indicative tree and shrub planting is shown within the proposed car park and on the southern section of the north-western boundary on the Indicative Development Plan (LVIA, page 45, 12. Appendix). There is the potential to introduce new native tree, shrub and wildflower planting as part of the landscape proposals to enhance the development proposals, including in the areas identified as Visual Barrier, Garden and car park area on the Indicative Development Plan. (Note the Indicative Development Plan shown in the LVIA, page 45, 12. Appendix is the Indicative Proposed Site Plan by AtkinsRealis, Drawing number 323319-15207-ATR-000-GF-DR-A-0250-S2-D0100 Rev P08).

4.13. The site features within the development are considered to undergo a medium magnitude of change with the transformation of the Haslar IRC extension development, due to the loss of landscape features, taking into consideration the introduction of a native landscape framework as part of the development proposals. This will lead to a moderate to minor adverse significance of effects at the post construction stage.

4.14. The planting that could be introduced as part of the development would mature over time providing new landscape features which could strengthen the local landscape pattern and create an improved setting to the proposed development, while enhancing the biodiversity value of the site in the longer term. This will lead to a small magnitude of change and residual effects of minor neutral.

Landscape Effects: England Coast Path

4.15. The England Coast Path passes through the public car park and informal scrub/grassland within the southern part of the site. This permissive path, where it passes through the site, will be re-routed slightly to run along the south-western side of the proposed car park. The England Coast Path is considered to have a medium sensitivity to change, deriving from the balance of landscape value and susceptibility to change.

4.16. The application proposals involve the replacement of the scrubland with further car parking, which will result in a continuation of the urban 'car park' character across the remainder of the south-western end of the site, alongside which the path will run, replacing the existing more rural / suburban edge character of this area of the site.

4.17. There is the opportunity to introduce new planting within the proposed car park area including significant tree planting across the car park, as well as shrub or hedgerow planting alongside boundaries and to break up car parking. This planting will help to mitigate changes to the character and setting of the path.

4.18. The magnitude of change resulting from this extension of urban character for a short section of the footpath is considered to be medium, with the overall significance of effects moderate adverse at the post construction stage. The planting that could be introduced in this car park area would mature over time to contribute to the overall character of the footpath as it passes along the south-western edge of the site. This could lead to a reduced magnitude of change to small and a residual effect of minor adverse which is not considered to be significant.

5. Visual Sensitivity and Effects

5.1. The Zone of Theoretical Visibility (ZTV) (Figure 7, p28, LVIA) indicates that potential visibility is limited on the landward side to localised views, with visibility extending on the coastal side across to the Southsea coastline.

5.2. The site is enclosed by closeboard fencing topped with security fencing along the site boundaries with the exception of the eastern boundary, which is a combination of concrete walling topped with security fencing. These boundary treatments provide lower level enclosure, with views possible to upper levels of the site through the security fencing.

5.3. Through the field survey, the site was found to have a limited zone of visual influence, with visibility restricted to some close range views, whilst from the distant Southsea coastline, its location was barely discernible.

Visual Effects: Fort Road & Clayhall Road

5.4. Fort Road and Clayhall Road are interconnecting roads to the west and north of the site. The sensitivity of the views for users of these roads is considered to be low as this is a transport route without the expectation of open views.

5.5. Although there would be some change to the view, because the proposed three storey buildings will be set back a considerable distance from the frontage, these partial views of the upper levels of the buildings beyond the boundary fencing will represent only a small change to the view. The introduction of the new entrance onto Fort Road and the single storey energy centre, due to their proximity to the road frontage, will represent a greater, though still limited, change to the view. New planting, reflecting the limitations of the tree canopy exclusion zone, could be provided to mitigate these changes to the views, which could be conditioned at Reserved Matters.

5.6. Users of Fort Road and Clayhall Road at close range on these roads were assessed in the LVIA as undergoing a minor adverse significance of effect at the post construction stage, and a slight neutral residual effect. These are not significant effects.

Visual Effects: Promoted Walking & Cycling Routes in Gosport

5.7. The Promoted Walking and Cycling Routes in the vicinity of the site are Hampshire Way, Solent Way, Wayfarer's Walk, and E9 Plymouth to Dover along Fort Road and Clayhall Road to the north-west and north of the site, and the England Coast Path across the southern end of the site and to the south-east of the site.

5.8. The sensitivity of the views from these Routes are medium as the immediate character is suburban to the west, with a more industrial / utilitarian character to the south-east along this part of the coast due to the existing Haslar IRC.

5.9. The magnitude of change was assessed in the LVIA to be medium on balance at the post construction stage, with the overall significance of effect moderate adverse for limited close range views for users of these Walking and Cycling Routes. New planting would help to mitigate views, with the residual significance of effect reduced to minor adverse, which is not a significant effect.

Visual Effects: Promoted Walking & Cycling Routes in Southsea

5.10. The Promoted Walking and Cycling Routes Hampshire Way, Solent Way, Wayfarer's Walk, E9 Plymouth to Dover and Nelson Way run along the Southsea coastline to the east of the site. The sensitivity of the views from these routes are considered to be high as they are passing through a valued recreational and cultural area with open views.

5.11. It is possible that the proposed 3 storey elements of the development will be just discernible and therefore a slight change to this distant view is possible, seen in the context of the other Gosport coastline buildings. Darker, muted building materials and colours would help to mitigate changes to these distant views. New tree planting within the site would also soften these views so that new buildings merge into the vegetated backdrop.

5.12. The magnitude of change is initially considered to be small to negligible, with the overall significance of effects moderate to minor adverse for distant views for these Walking and Cycling Routes.

5.13. As new planting matures, views of the new buildings would be barely discernible against a backdrop of trees. The magnitude of change would therefore be negligible with a minor neutral significance of residual effects. Both post construction and residual effects are not significant effects.

Visual Effects: Residential Amenity

5.14. Viewers from the row of dwellings on the south-eastern side of Fort Road, backing onto the site, will experience some change from upper storey windows, where there are no intervening trees within back gardens, showing oblique views of the single storey development and 3 storey development beyond.

5.15. Viewers from the dwellings facing the site from the north-western side of Fort Road will experience limited change to the view with the new vehicular entrance visible and partial views of the set back three storey development also possible beyond security fencing. Distant glimpsed views may also be possible from the upper storey of Haslar Terrace to the north.

5.16. The sensitivity of residential amenity overall is considered to be medium-high. Overall, the magnitude of change was assessed in the LVIA to be medium to small, with a major-moderate to moderate-minor adverse significance of effects for viewers from these dwellings.

5.17. New planting would integrate the built form and soften views into the site in the longer term in views from the north-western side of Fort Road and Haslar Terrace, however, there is limited opportunity for planting to mitigate views from dwellings backing onto the site on the south-eastern side of Fort Road, due to security constraints.

5.18. For the limited dwellings on the south-eastern side of Fort Road backing onto the site, the residual significance of effect would remain as major-moderate adverse, which is a significant effect. For the remaining identified dwellings, the visual effect would diminish to a moderate-minor neutral significance of residual effect.

Visual Effects: Gosport & Stokes Bay Golf Club

5.19. Views from Gosport and Stokes Bay Golf Club were found to be predominantly screened by mature intervening vegetation, apart from a short, unvegetated section of the south-western boundary of the site, where there may be partial views close to the boundary. The hedgerow and tree vegetation on the boundary will be retained within a 2m buffer, and managed to maintain a dense hedgerow, while any gaps will be reinforced with new native hedgerow and tree planting.

5.20. The magnitude of change was initially considered to be small, with a minor adverse significance of effects for limited close range views. As the new planting matures, views would become screened towards the site by the additional planting, with a neutral residual significance of effect from the north-eastern end of the golf course.

6. Local Plan Policy

6.1. Having assessed the landscape and visual impact of the proposed development through the LVIA, I consider that the development proposals are in accordance with Gosport Borough Council's Local Plan policies regarding landscape character and visual amenity. The proposed development, as described in principle through the Outline application, has been designed with a sympathetic layout, scale and massing which respects the pattern of the local built environment and local historic

assets. The proposals provide the opportunity to improve the character and quality of the area through sympathetic detailed design at Reserved Matters and through the provision of a landscape framework and the incorporation of new planting, enhancing biodiversity and providing new landscape features.

6.2. Landscape and visual mitigation features such as new tree planting, biodiversity features and a considered landscape framework across the site, will enable the development to integrate into the local landscape character of the area, improve the immediate landscape condition, and provide benefits to the biodiversity of the site.

7. Council's Landscape and Visual Comments

7.1. In this section I will respond to the landscape and visual matters within Gosport Borough Council's (GBC's) officer recommendation to the Regulatory board on 29th July 2026, which are elaborated on in the Statement of Case.

7.2. In relation to the Council's views on design, GBC state *"An overriding issue is the size and scale of the three storey buildings, which would be out of keeping with the area, not just compared with the predominantly single storey buildings within the Conservation Area, but also the surrounding residential development which is all two storeys in height."*

7.3. In the vicinity of the site, 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 forms a band of larger scale built form both in terms of massing and height, including buildings of the Royal Hospital, Canada House and Haslar Terrace to the north-east and Fort Monckton to the south-west. The size and scale of the proposed three storey buildings continue this pattern of larger scale built form along the coastline. At a more localised level, the proposed built form echoes the character and geometric layout of the existing enclosed historic development of Haslar Barracks, while providing a separation distance to protect the setting of the Haslar Barracks. The orientation of the blocks perpendicular to the coastline and set back from the south-eastern boundary minimises visual intrusion in views from the sea and the Southsea coastline.

7.4. HE, in their response to the consultation, state that *"There is at least some space between the proposed buildings and the barracks, which would reduce their presence when viewed from around the historic buildings and is welcomed."*

7.5. In relation to design, GBC also state *"It is considered that the current 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. It is clear that this proposal detracts from its location…"*

7.6. In terms of scale and massing, the proposals do respond to their setting, as indicated in paragraph 7.3 above, while detailing can be addressed at Reserved Matters. In terms of visual effects, the assessment carried out through the LVIA reports no significant residual visual effects from public viewpoints, primarily due to the location of the proposed built form set back from public routes and enclosed by high fencing. The only significant residual effect of major-moderate adverse is experienced from limited dwellings on the south-eastern side of Fort Road backing onto the site. In relation to residential amenity, GBC state that *"Residents may experience a loss of outlook from rear windows, however, this is across third party land and is not protected by planning policy."*

8. Conclusions

8.1. The findings of the Landscape and Visual Impact Assessment conclude that there will be no long term significant adverse effects arising as a result of the proposed development apart from that experienced from upper rear windows of limited private dwellings on the south-eastern side of Fort Road backing onto the site. Furthermore, the proposed development will provide the opportunity for landscape and biodiversity enhancements to the site. The residual effects reported in the LVIA are based on the expectation that details of planting would be conditioned at the Reserved Matters stage. The site therefore has the potential to accommodate the quantum of development proposed in landscape and visual terms at this Outline stage.