Town and Country Planning Act 1990

Section 293D Crown Development Application

Haslar Immigration Removal Centre (IRC)

Dolphin Way

Gosport

Hampshire

PO12 2AW

Proof of Evidence of

[redacted]

LLB (Hons) MSc Spatial Planning

Local Authority Ref: 26/00216/CROWN

Planning Inspectorate Ref: CROWN/2026/0000005

20th October 2026

1 Qualifications and experience

1.1 I am [redacted], Principal Conservation and Design Officer at Gosport Borough Council, a position I have held for 5 years. Prior to my appointment, I was Conservation Officer at East Hampshire District Council from 2016, having previously been a Development Management Officer at East Hampshire District Council and Winchester City Council, prior, I hold Spatial Planning MSc from Oxford Brookes University and a Qualifying Law Degree, LLB (Hons) from the University of Surrey.

1.2 The evidence which I have prepared and provide in this proof of evidence is true. I confirm that the opinions expressed are my true and professional opinions.

2 Heritage & Design

2.1 Haslar Barracks Conservation Area

The proposal is located within, and on land immediately adjacent to the Haslar Barracks Conservation Area, with the site also neighbouring the Stokes Bay Conservation Area to the south west and the Haslar Peninsula Conservation Area located to the north-east. It is therefore within this context consisting of the designated heritage assets of Fort Blockhouse, Haslar Hospital, Haslar Gunboat Yard, the former HMS Hornet and the Admiralty Experimental Works (Qinetiq) that the site lies in proximity to. The greater area's character is formed by this concentration of scheduled monuments, listed buildings, conservation areas and non-designated heritage assets that make up Gosport's rich military history informing the character of the surrounding townscape.

2.2 The Haslar Barracks Conservation Area Appraisal (GBC, designated 2017), describes the special interest of the Conservation Area (p.1):

'The Haslar Barracks site was developed in 1802 as a permanent regimental infantry barracks within a clearly defined boundary wall. The buildings are red brick, nearly all single storey, and retain the original plan form. In 1864 the site was converted into a military hospital as part of the first phase of reform to army hospitals following the Crimean War. Additional buildings included a water tower, day room and covered colonnade linking the wards (formerly the barrack ranges). Although one source suggests new wards may have been constructed, a commissioner's report indicates that the existing barrack buildings were converted. The complete plan form of this early army hospital survives. In the 1890s the site was taken over by the Royal Engineers who have very strong connections to the military defences in the Borough and experiments and training in the use of searchlights and mines. These three phases, and the retention of the historic buildings associated with them in the scale of the buildings and their plan form, make this site of particular interest.'

2.3 In the late 18th century, the site that was to become Haslar Barracks was known as 'Camp Field.' This strategic waterfront site close to the naval anchorage at Spithead influenced the decision to construct the barracks in this location. The site served a dual purpose: strengthening strategic coastal defence and troop transport to and from Great Britain. During the French Revolutionary and Napoleonic wars, Gosport became a central hub for military activity, hosting numerous transiting armies, coastal defence operations, and garrison duties. Many prominent regiments occupied the site, including those rotated through the barracks, stationed there prior to overseas deployment, or were housed immediately upon returning to England. Notably, the barracks also served as an isolation facility, once quarantining an entire

regiment during a cholera outbreak. An Appendix of the list of regiments known to have occupied this site is included in the Conservation Area Appraisal.

2.4 Haslar Barracks holds national historic significance due to its type and its strategic role in defending the Gosport and Portsmouth military establishments. It is believed to be England's only surviving regimental infantry barracks complex built to counter the threat of invasion in the years leading up to the Battle of Trafalgar (1805) with many of the original buildings still standing today.

2.5 The site's military use spans over two centuries, evolving through three major phases:

- **1800 – c1864 (Infantry Barracks):** Served as a frontline defence complex during a critical period of threatened invasion.
- **1865-c1892 (Army Hospital):** Converted and partially redeveloped into an army hospital, reflecting major post-Crimean War military healthcare reforms.
- **c1892 to c1939 (Royal Engineers Base):** Became the home of the Royal Engineers, long connected to the extensive, nationally important military defences throughout the region.

In the 20th Century, the site continued its military use with an Anti-Aircraft Brigade occupying the site during the 1940s followed by the Royal Army Ordnance Corps in the early 1950s. Post 1950s the site became a Youth Offenders' Centre, before its final use as an Immigration Holding Centre, closing in 2017.

2.6 The Haslar Barracks Conservation Area includes the following locally listed buildings:

Former Officers Quarters, Water Tower, 6 former Barracks, Wall and attached buildings, 2 buildings flanking Parade Ground.

3 Haslar

3.1 Directly north east of the site, on the north side of Dolphin Way lies Haslar Peninsula Conservation Area, designated in 1990, The area covers approximately 50 hectares and incorporates three major areas of historic and architectural interest: Haslar Hospital, Fort Blockhouse, and Haslar Gunboat Yard, with further buildings and features within the former HMS Hornet site and the area to its south.

3.2 Directly north east of the site lies Haslar Hospital and its Historic Park. Begun in 1745 and completed in 1761-2, Haslar was the first purpose built naval hospital in England. Intended for 1500 men, and originally designed to be built as a massive closed four-sided quadrangle centred around a grand inner courtyard, the fourth (south) closing range was never built. By 1780 it could accommodate 2100 men and remained the largest military hospital in England until Netley was constructed a century later.

3.3 The hospital site includes 13No. listed buildings, with Ward Blocks A, B, C, D, E, F And Centre listed as Grade II*. The rear of the Grade II listed Haslar Terrace is visible from Fort Road, adjacent to the boundary of the IRC on approach from the south. The significance of Haslar as a landscape is signified by its inclusion on the National Register of Historic Parks and Gardens and its designation in 2001 as a Grade II Listed Historic Park.

4 Fort Monkton

4.1 Directly to the south of the boundary of the application site lies Fort Monckton, designated as a Scheduled Monument. Built between 1781 and 1790 to defend the western approaches to Portsmouth Harbour, further defensive fortifications continue south at Fort Gilkicker further south and the Stokes Bay Lines to the west. Historic England list the reasons for designation as Rarity, Archaeological importance, Historic importance, Architectural importance, Survival, Vulnerability, Documentation, Potential for archaeological deposits, Diversity, and Group value.

5 Assessment of the impact of the proposals

5.1 The proposed development is considered to have an overbearing impact upon the Haslar Barracks Conservation Area, causing harm to its significance and its setting. There are further concerns on the impact on the setting of the Haslar Peninsula Conservation Area, the setting of the Grade II listed Haslar Terrace and the greater impact on the heritage led regeneration of the area set out below.

5.2 The principle issues relating to the development are the proposed size and scale of the buildings and their poor design in relation to the historic barrack buildings, which are of predominantly single storey height surviving largely intact, as set out in the summary of the special interest of the Conservation Area from the Conservation Area Appraisal above.

5.3 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. The issue is exacerbated by the site's location in a flood zone, which will require raised floor levels resulting in the buildings appearing even higher.

5.4 Pre-application advice was provided in relation to the proposals which raised concerns over the size, height and proximity to the Conservation Area and design of the proposed buildings. The Design and Access Statement submitted with the current application variously states the distance from the boundary of the Conservation Area and the nearest proposed three storey buildings as 24m (5.6.1_LP10 Development Form) and 20m (5.7_Heritage Consultation). The Heritage Impact Assessment states the distance as 'approximately 20 m back from the Conservation Area' (6.2.2). Measurement of the indicative landscape plans show the distance to be approximately 24m.

5.5 Notwithstanding the indicative nature of the drawings and that scale, siting, and appearance are reserved matters, 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. The location of four No. three storey blocks of 12m in height, two of which are 24m from the boundary of the Conservation Area, consisting of low slung, predominantly single storey historic barrack buildings is therefore considered overbearing and harmful to the Conservation Area and at odds with the characteristics of the buildings within which are of significantly lower height and of greater architectural quality.

5.6 The sensitivity of developing this site, directly adjacent to the Conservation Area was recognised when the Haslar Barracks Conservation Area Appraisal was adopted, for the Haslar Barracks CAA states at p.22:

'The broader setting of the Conservation Area: The surrounding land.

'... The western boundary to the site should retain a landscaped strip of land between the existing buildings and any future development to its south-west: possibly with consideration given to tree planting and a footpath link to the waterfront to ensure a degree of separation. 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.'

5.7 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, it should not be regarded as a substitute for well-designed developments within the setting of heritage assets.

5.8 The Design & Access Statement and Heritage Impact Assessment that support the planning application both refer to the dining block and CASU as single storey respectively. This is considered disingenuous as the plans, though redacted, are annotated showing a first floor, serving each building respectively. These buildings are therefore particularly poor in design terms, resulting in elevations that look unbalanced as there are no windows at first floor level to articulate the upper floor, which combined with the extended eaves height, results in an awkward, top-heavy composition. The poor design of these buildings is particularly concerning as the Heritage Impact Assessment states they will 'provide a buffer to the conservation area' (6.2.2).

5.9 The impact on the Conservation Area and beyond would be lessened by better designed buildings, picking up on the architectural qualities of the barracks and of lower height than proposed that would assimilate into the townscape.

5.10 As Historic England set out in their pre-application advice: '*The current proposals do provide a bit of space between the conservation area and the detention centre buildings but could not be described as good neighbours. At three storeys they are rather larger than the single storey historic barrack buildings – probably large enough to appear over bearing'.* Historic England also recommended lowering the buildings by a storey to avoid impacting upon the Conservation Area.

5.11 In the latest response to the proposal at outline application stage, Historic England state:

'*These proposals would not greatly harm the significance of the barracks when viewed in very narrow terms. Its setting is already poor; more fencing and large utilitarian buildings will make this only situation slightly worse.*

As an aside, we need to be honest about the term utilitarian here. These buildings would be ugly – for all the warm words in the design and access and heritage statements the pressures on budgets on a publicly funded project will mean these would be constructed as cheaply as possible. Economising on materials, design and detailing inevitably compromises quality.

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 welcome.

The proposals would also harm the barracks in a wider sense as they make improving the environment in this part of Gosport much harder. The IRC is probably a medium-term use. This site has been allocated for residential in the past and there is the potential here for the barracks to form the heart of a high-quality new residential development that reveals and reinforces their architectural qualities while creating a quality environment in which to live. The current

proposals, by placing large and unattractive buildings on the site that would be difficult and expensive to reuse or replace, would make this long-term aim harder to achieve.

Recommendation

The National Planning Policy Framework requires conflicts between the conservation of heritage assets to be avoided or minimised and any harm, even of a low level, to be clearly and convincingly justified and weighed against the public benefits of the proposal (paragraphs 208, 213 and 215). 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. Whether the public benefits of the proposals outweigh the harm is not for us to comment on.'

5.12 Therefore Historic England acknowledge the setting of the Conservation Area due to the existing proliferation of security fencing will be made worse by the proposed development, identifying harm to the Conservation Area and wider harm of the proposals to the area in general.

6 Legislative and Policy background

Section 72 of the Planning (Listed Buildings and Conservation Areas) Act 1990 requires planning authorities, when considering whether to grant planning permission for development which affects a Conservation Area, to have special regard to the desirability of preserving or enhancing the character and appearance of that area.

Section 66 of the Planning (Listed Buildings and Conservation Areas) Act 1990 requires planning authorities, when considering whether to grant planning permission for development which affects a listed building or its setting, to have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses.

6.1 NPPF (2026)

The recently updated NPPF (August 2026), states:

HE4: Securing the conservation of heritage assets

1. Heritage assets, as an irreplaceable resource, should be conserved in a manner appropriate to their significance. To achieve this, development proposals which would affect the significance of heritage assets, including any contribution made by their setting should:

a. Maintain or secure a use consistent with their conservation, taking into account the importance of maintaining the assets, the positive contribution they can make to sustainable communities including local economies, and the positive contribution they can make to local character and distinctiveness; and

b. Avoid (or if that is not possible, minimise) harm to the significance of heritage assets, and instead conserve this significance.

2. Any harm to, or loss of, the significance of a designated heritage asset (including from development within its setting) should have a clear and convincing justification in accordance with the policies in this chapter.

HE5: Assessing effects on heritage assets

1. Development proposals affecting heritage assets should be accompanied by an assessment of the significance of the assets affected (including any contribution made by their setting) and of the potential effect of the proposal on their significance. The level of detail should be proportionate to the assets' importance and no more than is necessary to understand the potential effect of the proposal on their significance. The relevant historic environment record should be referred to in making this assessment, and appropriate expertise employed where necessary.

2. Assessments of the potential effects of development proposals on the significance of heritage assets (including through effects on their setting) should identify whether proposals would be likely to:

a. Have a positive effect, which is where the significance of a heritage asset would be enhanced, or better revealed; or

b. Have no effect on the significance of a heritage asset; or

c. Result in harm to the significance of a heritage asset, either from work affecting the asset itself or from development within its setting. The degree of harm should be identified: substantial harm would occur where the development proposal would seriously affect a key element of the asset's significance; or

d. Cause the total loss of the significance of a heritage asset.

3. In making this assessment it is the effect on a heritage asset's significance rather than the scale of the development which should be considered.

4. Decision-makers should be satisfied that assessments accurately reflect the effects on heritage assets caused by development proposals.

5. Where a development proposal involves, or has the potential to involve, a heritage asset with archaeological interest, an appropriate desk-based assessment should be undertaken and, where necessary, a field evaluation. These should be used to help understand the asset's significance and the potential effect of the proposal on this, which should inform the design, mitigation and implementation of the development

HE6: Proposals affecting designated heritage assets

1. When considering the potential effect of a development proposal on the significance of a designated heritage asset, substantial weight should be given to the asset's conservation (and the more important the asset, the greater the weight should be). This is irrespective of whether any potential effect amounts to a positive effect, harm, substantial harm, or total loss of its significance.

2. Development proposals which would have a positive effect on a designated heritage asset should be supported.

3. Any harm to a designated heritage asset will be a matter of considerable importance and weight, which should be dealt with in accordance with paragraphs 4 to 6 of this policy.

4. Where a development proposal would harm the significance of a designated heritage asset the effect on the asset and its significance should be weighed against any public benefits

resulting from the proposal. Important public benefits can include securing the long-term reuse of a vacant or underused listed building, and enabling energy efficiency and low carbon heating measures to be employed.

HE9: Conservation areas

1. Development proposals within or affecting the significance of conservation areas should:

a. Retain and conserve buildings and other features which make a positive contribution to the character or appearance of the conservation area where possible; and

b. 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.

2. Not all elements of a conservation area will necessarily contribute to its significance. Where a development proposal would result in the loss of a building or other element which contributes to the character or appearance of a conservation area that is desirable to conserve, the assessment of impact should take into account the relative significance of the element affected and its contribution to the significance of the conservation area as a whole, and the effects of this considered in accordance with policies HE5 and HE6.

3. Proposals which conserve those elements of a conservation area that make a positive contribution to the area (or which better reveal its significance) should be supported.

6.2 As discussed above, the proposals have not 'avoided (or minimised) harm to the setting of heritage assets, and instead conserve this significance', as required by HE4, above. HE4 also requires that: 'Any harm to, or loss of, the significance of a designated heritage asset (including from development within its setting) should have a clear and convincing justification in accordance with the policies in this chapter'. The Heritage Impact Assessment and Design and Access Statement underplay the harm that the proposals will cause to the Conservation Area and therefore do not accurately reflect the effects on heritage assets caused by development proposals, contrary to HE5, above.

6.3 HE6, above, requires that in assessing proposals that impact upon the significance of a designated heritage asset: 'substantial weight should be given to the asset's conservation (and the more important the asset, the greater the weight should be). This is irrespective of whether any potential effect amounts to a positive effect, harm, substantial harm, or total loss of its significance… Where a development proposal would harm the significance of a designated heritage asset the effect on the asset and its significance should be weighed against any public benefits resulting from the proposal. Important public benefits can include securing the long-term reuse of a vacant or underused listed building, and enabling energy efficiency and low carbon heating measures to be employed.' Therefore, given the harm to the significance of the Conservation Area identified above, it is for the decision maker to weigh the balance as to the public benefits of the proposals.

6.4 HE9, above requires that development proposals within or affecting the significance of conservation areas should:

'a. Retain and conserve buildings and other features which make a positive contribution to the character or appearance of the conservation area where possible; and

b. 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. '

It is contended that the proposed development does not accord with part 'b', above, as the buildings bear no relation to the special architectural or historic interest of the Haslar Barracks Conservation Area and indeed causes harm to it.

7 Setting

7.1 The NPPF (2026) defines the setting of a heritage asset as:

'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.' Annex B, Glossary.

7.2 Historic England have published the Good Practice Advice note: '*The Setting of Heritage Assets Historic Environment Good Practice Advice in Planning Note 3* (Second Edition), 2017' giving assistance concerning the assessment of the setting of heritage assets. The advice provides: 'Setting is not itself a heritage asset, nor a heritage designation, although land comprising a setting may itself be designated…Its importance lies in what it contributes to the significance of the heritage asset or to the ability to appreciate that significance.' (p.4) and further explains: 'Because the contribution of setting to significance does not depend on public rights or ability to access it, significance is not dependent on numbers of people visiting it…'(p.4)

7.3 The Good Practice Advice note goes on to state: ' The setting of a heritage asset is 'the surroundings in which a heritage asset is experienced' (NPPF, Annex 2: Glossary). Where that experience is capable of being affected by a proposed development (in any way) then the proposed development can be said to affect the setting of that asset.'

7.4 In order to assess the degree to which these settings and views make a contribution to the significance of the heritage asset(s) or allow significance to be appreciated, The Good Practice Advice note advocates the assessment of 'whether the setting of an affected heritage asset makes a contribution to its significance and the extent and/or nature of that contribution; both setting, and views which form part of the way a setting is experienced, may be assessed additionally for the degree to which they allow significance to be appreciated.(p.10), firstly addressing 'the key attributes of the heritage asset itself and then consider:

- the physical surroundings of the asset, including its relationship with other heritage assets
- the asset's intangible associations with its surroundings, and patterns of use
- the contribution made by noises, smells, etc. to significance, and
- the way views allow the significance of the asset to be appreciated.'

7.5 In the assessment of setting of Haslar Barracks, the physical surroundings of the Haslar Barracks Conservation Area are richly imbued by its location and tangible association with the numerous military heritage assets located within the directly adjacent Haslar Peninsula Conservation Area, mentioned above. 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

beyond. 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.

7.6 In order to assess the effects of the proposed development, whether beneficial or harmful, on the significance or on the ability to appreciate it, the Good Practice Advice note acknowledges that: 'the wide range of circumstances in which setting may be affected and the range of heritage assets that may be involved precludes a single approach for assessing effects. Different approaches will be required for different circumstances. In general, however, the assessment should address the attributes of the proposed development in terms of its:

- location and siting,
- form and appearance,
- wider effects,
- permanence' (p.11)

7.7 As discussed above, location, siting, form and appearance of the proposed development are considered harmful to the Conservation Area and its setting, along with the wider negative effects on the Haslar Peninsula and its heritage led regeneration. With regards to the degree of permanency (and the wider negative effect on Haslar peninsula) of the proposed development, as stated above by Historic England and repeated here for ease:

'The proposals would also harm the barracks in a wider sense as they make improving the environment in this part of Gosport much harder. The IRC is probably a medium-term use. This site has been allocated for residential in the past and there is the potential here for the barracks to form the heart of a high-quality new residential development that reveals and reinforces their architectural qualities while creating a quality environment in which to live. The current proposals, by placing large and unattractive buildings on the site that would be difficult and expensive to reuse or replace, would make this long-term aim harder to achieve.'

7.8 The 'heritage balance', i.e. weighing the identified harm against the public benefits of the proposals for the purposes of policy HE6(4) is undertaken by a different witness (Simon Barnett). Given the proposals are an outline application with all matters reserved except access, in principle there is opportunity for the applicant to explore alternative layouts, building heights and designs that have potentially lesser impact in heritage terms. For example, if the buildings were to be relocated further away from the boundary of the Conservation Area to the proposed 'car park' area, or distributed to a more central position within the site.