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**From:** Eleanor King [REDACTED]  
**Sent:** 03 December 2021 15:12  
**To:** PlanningPolicyConsultation  
**Cc:** Bryony Stala  
**Subject:** Local Plan 2038 Consultation Response  
**Attachments:** Gosport Reps Ministry of Justice Merged.pdf

Good afternoon,

On behalf of our clients the Ministry of Justice, please find attached Representations to the current Local Plan 2038 Regulation 18 Consultation.

I would appreciate confirmation that the attached document has been received.

Many thanks,

Eleanor King BA (Hons) MSc MRTPI

Associate

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# Gosport Borough Local Plan 2038 Consultation Response Form

REF: \_\_\_\_\_ (for office use)

Town and Country Planning (Local Planning)  
(England) Regulations 2012 - Regulation 18 Consultation



**GOSPORT**  
Borough Council

All responses to this consultation on the draft Gosport Borough Local Plan 2038 will be taken into account and used to prepare the next stage of the Local Plan. The Local Plan, supporting documents and further information can be viewed online: [www.gosport.gov.uk/GBLP2038](http://www.gosport.gov.uk/GBLP2038)

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**This form should be returned by email or post by Friday 3<sup>rd</sup> December 2021**

Please email to: [planningpolicyconsultation@gosport.gov.uk](mailto:planningpolicyconsultation@gosport.gov.uk)

or post to: Gosport Borough Council, Planning Policy, Town Hall, High Street,  
Gosport, PO12 1EB

To discuss any queries please contact the Planning Policy Team:  
Email: [planning.policy@gosport.gov.uk](mailto:planning.policy@gosport.gov.uk) Telephone: 023 9254 5461

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## Your details

**Name:**

**Organisation (if any):**

**Address (and postcode):**

**Telephone:**

**Email:**

## Agent/Consultant details (if appointed)

**Name:**

**Organisation (if any):**

**Address (and postcode):**

**Telephone:**

**Email:**

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If you need this document in large print, on CD or tape, in Braille or in another language, please ask.

## Your representation

The draft Gosport Borough Local Plan 2038 contains a vision, objectives and policies with explanation text. Please use the boxes to let us know what you are commenting on and whether you support or object along with your comments.

<b>Paragraph/Policy Number:</b> _____	<b>Support/Object (please tick):</b>	<input type="checkbox"/> Support	<input type="checkbox"/> Object
<b>Please summarise why:</b> Please refer to attached PDF Representation Document			

<b>Paragraph/Policy Number:</b> _____	<b>Support/Object (please tick):</b>	<input type="checkbox"/> Support	<input type="checkbox"/> Object
<b>Please summarise why:</b>			

<b>Paragraph/Policy Number:</b> _____	<b>Support/Object (please tick):</b>	<input type="checkbox"/> Support	<input type="checkbox"/> Object
<b>Please summarise why:</b>			

**Paragraph/Policy  
Number:** \_\_\_\_\_

**Support/Object  
(please tick):**

Support

Object

**Please summarise why:**

**Paragraph/Policy  
Number:** \_\_\_\_\_

**Support/Object  
(please tick):**

Support

Object

**Please summarise why:**

**Paragraph/Policy  
Number:** \_\_\_\_\_

**Support/Object  
(please tick):**

Support

Object

**Please summarise why:**

<b>Paragraph/Policy Number:</b> _____	<b>Support/Object (please tick):</b>	<input type="checkbox"/> Support	<input type="checkbox"/> Object
<b>Please summarise why:</b>			

<b>Paragraph/Policy Number:</b> _____	<b>Support/Object (please tick):</b>	<input type="checkbox"/> Support	<input type="checkbox"/> Object
<b>Please summarise why:</b>			

**If you need more space for comments please use another form or separate paper. Remember to include your name on any forms you use so we can consider your comments.**

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### **How will we use your personal information?**

By completing this form you give your consent that your details will be retained to notify you of information relating to the production of the Gosport Borough Local Plan 2038.

Please note the completed form is a public document. All completed forms will be made public on our website including the names of the individual/organisation who submitted them (all other personal information will remain confidential).

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## Optional monitoring questions

Gosport Borough Council is committed to promoting equality of opportunity and respect for diversity in the services we provide. The following questions are to help us understand how the Local Plan consultation would impact different groups of people. It is not compulsory to answer the questions, but voluntarily providing this information will help us to monitor how effectively we are talking to a range of people right across the communities we serve.

**Note: If you are answering on behalf of a community group or organisation, then you don't need to complete this section.**

All information is held in accordance with the General Data Protection Regulation.

**1. Are you...?** Please select one option

- Male
- Female
- Other \_\_\_\_\_
- Prefer not to say

**2. Is your gender identity the same as you were assigned at birth?** Please select one option

- Yes
- No
- Prefer not to say

**3. What is your age?** Please select one

- Below 16
- 16 - 24
- 25 - 34
- 35 - 44
- 45 - 54
- 55 - 64
- 65 - 74
- 75 - 84
- 85 or over
- Prefer not to say

**4. How would you describe yourself?**

Please select one option

- Heterosexual or straight
- Bisexual
- Lesbian woman
- Gay Man
- Other \_\_\_\_\_
- Prefer not to say

**5. Do you consider yourself to have a disability, or a long-term illness, physical or mental health condition?** Please select one option

- Yes
- No (go to question 7)

**6. What is the nature of your disability, long-term limiting condition or health problem?** Please select all that apply

- Physical disability
- Hearing disability
- Learning disability
- Visual disability
- Mental ill health
- Other (please state)

\_\_\_\_\_  
 Prefer not to say

**7. Which group do you most identify with?**

Please select one option

- No religion
- Christian
- Muslim
- Jewish
- Sikh
- Buddhist
- Hindu
- Other religion \_\_\_\_\_
- Prefer not to say

**8. Are you pregnant?**

- Yes
- No
- Prefer not to say

**9. Have you had a child in the last 12 months?**

- Yes
- No
- Prefer not to say

**10. To which of these groups do you consider you belong?**

- Single
- Separated
- Married
- Divorced
- Widowed
- Co-habiting
- Same sex civil partnership
- Prefer not to say

**11. To which of these groups do you consider you belong?** Please select one option

**White**

- English/ Welsh/ Scottish/ Northern Irish/ British
  - Irish
  - Gypsy or Irish Traveller
  - Eastern European
  - Other White background (please describe)
- 

**Black / African / Caribbean / Black British**

- African
  - Caribbean
  - Any other Black / African / Caribbean background (please describe)
- 

**Asian / Asian British**

- Indian
- Pakistani
- Bangladeshi
- Chinese
- Any other Asian background (please describe) \_\_\_\_\_

**Mixed / multiple ethnic group**

- White and Black Caribbean
- White and Black African
- White and Asian
- Any other mixed / multiple ethnic background (please describe)

**Other ethnic group**

- Arab
  - Any other ethnic group (please describe)
- 

- Prefer not to say

**12. Do you have a connection to the Armed Forces?**

- Yes
- No

**13. If you do have a connection to the Armed Forces, please choose which option best described that connection.**

- serving member of the armed forces
  - family member of someone currently serving
  - veteran
  - family member of a veteran
  - other (please describe)
- 

- Prefer not to say



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# Representations to the Gosport Borough Council Draft Local Plan 2038

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Former Haslar Immigration Removal Centre,  
Gosport

# Representations to the Gosport Borough Council Draft Local Plan

Former Haslar Immigration Removal Centre, Gosport

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## 1. Introduction

- 1.1. On behalf of our client, Ministry of Justice, Savills is responding to Gosport Borough Council's (GBC's) Draft Local Plan 2038 Consultation Draft (Regulation 18), published September 2021.
- 1.2. This representation relates mainly to land at the Former Haslar Immigration Removal Centre, in Gosport, which is proposed for development within the Plan Period and is included as a draft development allocation for 225 dwellings.
- 1.3. For plan making the Government, through the National Planning Policy Framework (NPPF), revised in 2021, requires Local Planning Authorities to plan positively and seek new opportunities for development with sufficient flexibility to adapt to rapid change.
- 1.4. The current Development Plan for GBC consists of the Local Plan 2011-2029, which was adopted in October 2015 and replaces the 'saved' policies of the Gosport Borough Local Plan Review (2006). As this document was adopted more than five years ago it is currently considered out of date.
- 1.5. For ease of reference these representations are presented in tabular form, following the sequence of the Draft Plan.

### Former Immigration Centre

- 1.6. The site is located within the defined settlement boundary of Gosport, immediately fronting The Solent. The site is bounded by Dolphin Way to the north, Fort Road and residential dwellings to the west, a public car park to the south west and a narrow promenade and The Solent to the south east. The former Haslar Royal Hospital which is currently being converted is located to the north beyond Dolphin Way.
- 1.7. The site measures approximately 6.5 hectares, and consists of the former Haslar Immigration Removal Centre. Approximately 40% of the site consists of a large open space, previously used as sports pitches. The topography of the site is relatively flat.

Figure 1.1 Site Location Plan demonstrating previously developed land (Green) and open space (Blue)



- 1.8. The site relates well to the existing built up area, including the adjacent development site of Haslar Hospital, and it is in a sustainable location.
- 1.9. Access into the site is via Dolphin Way, with all visitors, staff and deliveries, entering and leaving by the same entrance when the site was in operation. Other access around the periphery of the site is restricted by either brick walls or metal fences which are reinforced to provide additional security for the site.
- 1.10. Within the site there are a number of buildings of varying age and type, which served as offices, dormitories, greenhouses, communal buildings, leisure or faith spaces, workshops and kitchens, whilst the centre was in operation. Hard surfaced areas surround these buildings, and they are separated from the open space by a gated, reinforced metal fence. There are currently no statutorily designated listed buildings on site, however some buildings are deemed to have local interest, these are as follows:
  - Former Office Quarters
  - Water Tower
  - 6 Former Barracks
  - Wall and attached buildings
  - Two buildings flanking Parade Ground

# Representations to the Gosport Borough Council Draft Local Plan

Former Haslar Immigration Removal Centre, Gosport

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- 1.11. Discussions relating to the future development of the site have been held with GBC Officers since 2019. Currently the future use of the site is unknown, however it is promoted for allocation within the emerging Local Plan for around 225 dwellings.



## 2. Draft Local Plan Policies

2.1. The comments on the Draft Local Plan policies are set out below:

**Table 2.1 Comments on the Draft Local Plan**

Page	Section	Para	Comment
30	Policy D1: Adaptation and Mitigation to Climate Change	Policy D1	<p>The emphasis of Policy D1, and the principle of moving Gosport Borough towards low carbon initiatives is strongly supported.</p> <p>In relation to the wording of Policy D1, it does not seem necessary for the inclusion of this as a standalone policy if all matters are already covered by other policies within the Local Plan. This appears to include a level of complexity which is not necessary, and does meet the criteria of NPPF Paragraph 16(f) which avoids unnecessary duplication of policies.</p> <p>Therefore it is recommended that whilst the text of Policy D1 can be retained within the Draft Local Plan, it should not form a separate policy given that each element is already contained within other emerging policies of the Plan. This could instead form part of the Vision, or an ‘overarching principle’ of the Plan, emphasising its importance, but ensuring the duplication of policies is avoided.</p>
36	Policy D2: Development Strategy	Policy D2; 2.3.23- 2.3.30	<p>The deviation away from the Government’s Standard Methodology is not supported as it does not appear that significant and robust evidence is provided to demonstrate a lower housing figure should be included.</p> <p>The Government introduced the Standard Methodology for Housing Need to provide a standard formula for the <b>minimum</b> number of homes expected to be planned for, in a way “<i>which addresses projected household growth and historic under-supply</i>” (Planning Practice Guidance, Paragraph, 002, Ref: 2a-002-20190220, emphasis added).</p> <p>The Draft Plan indicates that part of the reasoning to support a lower figure within the emerging policy is based on “past trends” (Paragraph 2.3.25), however these are already accounted for within the Standard Methodology formula. By reducing the figure from the proposed <b>minimum</b> amount, GBC are not following the requirements of the NPPF nor looking to significantly boost the supply of deliverable homes within the Plan Period. This is likely to have further impacts on the availability and affordability of homes in Gosport across the Plan Period.</p> <p>It is suggested that as a minimum more robust evidence is provided to support the lower proposed figure, however the preference is for GBC to adopt the latest Standard Methodology figure required by the Government and the NPPF.</p>

# Representations to the Gosport Borough Council Draft Local Plan

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Page	Section	Para	Comment
45	Table 2: Housing Supply at 1 April 2021 for the Plan Period to 2038		The inclusion of Haslar Barracks (225 dwellings) as part of the proposed housing supply for the emerging Plan Period is supported. However it is noted that the exact quantum and density that the site could support is not currently known, so the final number of units delivered at the site may change as a result of detailed design work.
52	Policy D3: Urban Regeneration Areas	2.4	<p>The inclusion of Haslar Barracks within the R1 Harbour Regeneration Area (HBRA) is fully supported.</p> <p>The site is largely previously developed land, and following closure of the operations at the site in 2015 it is suitable to provide an alternative use. It is sustainably located close to other regeneration sites including the Haslar Hospital, as well as existing residential neighbourhoods and relevant supporting infrastructure and community uses. The sustainability of the site is recognised by the Local Plan and this, along with its identification as a site suitable for future development, is fully supported.</p>
56	Policy D3: Urban Regeneration Areas	Policy D3	<p>Although the wording of Policy D3 is generally supported, there is not sufficient emphasis on the abnormal costs that are involved in preparing and developing regeneration sites. It should therefore be included throughout the wording of Policy D3 that all requirements of sites within the HBRA will be subject to viability.</p> <p>Furthermore the requirements of Part 2(a-d) of the Policy are already covered by national planning policies within the NPPF, and other emerging policies within the Draft Local Plan.</p> <p>In accordance with the NPPF Paragraph 16(f), to avoid unnecessary duplication Part 2 of Policy D3 <u>should be removed</u>.</p> <p>If it is chosen for this part of the policy to be retained, revised wording for Policy D3 is therefore recommended:</p> <p><i>“2. All development proposals within the three Urban Regeneration Areas should address the following key local issues <u>wherever possible and subject to site-specific constraints including viability analysis, in line with the relevant strategic policy and national planning guidance;</u>”</i></p> <p>Clarity should also be included within Part 2(c) of the policy to confirm this relates to internationally and nationally important <u>nature conservation</u> sites, as it is currently unclear.</p>



# Representations to the Gosport Borough Council Draft Local Plan

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Page	Section	Para	Comment
85	Nutrient Neutrality (Point 2e of Policy D5)	2.6.39-2.6.44	<p>It is recognised the nutrients have becoming an increasing concern within the Solent region since the adoption of the previous Local Plan within Gosport, and therefore the inclusion of a specific policy section within the emerging document is supported. However, the wording providing within the Draft Local Plan is currently too broad and does not provide a concise, clearly written policy in accordance with Paragraph 16(d) of the NPPF.</p> <p>The following changes are suggested to the paragraphs contained within the Draft Local Plan:</p> <p><u>2.6.40</u> Definition is required in relation to which commercial and industrial uses are required to submit a nutrient budget alongside a planning application. It is recommended that this wording refers back to the HRA guidance, or similar, for this definition.</p> <p><u>2.6.42</u> This paragraph should say “feasible/viable” rather than “available” as currently. This is because the on-site mitigation measures may be available, but not viable or deliverable.</p> <p>In addition the following wording should be included within this paragraph:</p> <p><i>“Where on-site measures are not possible, off-site measures will be considered, such measures include <del>including</del> land offsetting schemes, the creation of interceptor wetlands and enhancements to wastewater treatment works.”</i></p> <p><u>2.6.43</u> It is not currently clear how developers will contribute towards the offsite mitigation the Council are working on, and confirmation should be included in the Draft Local Plan, for example whether this will be secured via Section 106 agreements, Community Infrastructure Levy (CIL) payments, or other methods.</p> <p><u>2.6.44</u> The following wording should be included within this paragraph:</p> <p><i>“Further details on nitrate neutrality and offsetting measures can be found on the Council’s webpage and in the Natural England guidance’</i></p>



# Representations to the Gosport Borough Council Draft Local Plan

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Page	Section	Para	Comment
124	Policy D10: Heritage Assets	Policy D10	<p>The NPPF makes it clear that heritage assets should be conserved “<i>in a manner appropriate to their significance</i>” (Paragraph 189). This indicates therefore that a heritage asset considered to have lower significance than another should not be afforded the same level of protection or conservation status.</p> <p>It is considered that the wording of Policy D10 does not make it clear that heritage assets will be conserved in accordance with their significance, and instead appears to state that any and all heritage assets within the Borough will be afforded the same protection. This is not only not in accordance with the requirements of the NPPF, but is likely to impact the viability and deliverability of development sites which have assets of a lower significance.</p> <p>It is recommended that more emphasis is placed within Policy D10 that heritage assets will be protected and conserved <u>in a manner appropriate to their significance</u>, which will be assessed on a site by site basis at the time of submission of a planning application.</p> <p>The proposed wording of the policy is therefore recommended:</p> <p><i>“2. Planning permission will be granted for development that affects heritage assets, and where relevant their setting, provided it conserves and enhances those features which positively contribute to its special architectural, historic, landscape or archaeological interest, <u>taking into account its level of significance</u>” and</i></p> <p><i>“3. Development proposals which affect heritage assets, whether designated or non-designated, or their setting, will be determined with regard to their significance <u>in accordance with the requirements of the NPPF</u>”</i></p> <p>Paragraph 2.11.9 “<i>The Borough Council will determine planning applications affecting designated assets including Listed Buildings, Registered Parks and Gardens and Scheduled Ancient Monuments, as well as applications for Listed Building consent, in accordance with national guidance <u>and taking into account the level of significance of each asset</u>”</i></p>

# Representations to the Gosport Borough Council Draft Local Plan

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Page	Section	Para	Comment
129	Policy D11: Securing Infrastructure	Policy D11	<p>Whilst the provision of Policy D11 is generally supported, there should be flexibility included within the policy to allow for phased developments to provide infrastructure at the relevant phase.</p> <p>The following revised wording is therefore recommended for Policy D11:</p> <p><i><u>“3. Development proposals will be permitted where it can be clearly demonstrated that the required infrastructure can be provided prior to the occupation of the new development, or for phased developments, development proposals will be permitted where it can be demonstrated that the required infrastructure can be provided in suitable phased approached prior to the occupation of relevant parts of the proposed development”.</u></i></p>
189	Policy SS7: Haslar Barracks	3.9	<p>The inclusion of Haslar Barracks as an allocation within the emerging Local Plan is fully supported, however some minor amendments are recommended to the body of the policy and its supporting text</p> <p><u>Heritage</u></p> <p>Paragraph 3.9.1 states that the site is of national historic significance as it “<i>appears to be the only significant regimental infantry barracks’ complex that survives in England relating to the threat of invasion in the years leading up to the Battle of Trafalgar (1805)</i>” and that “<i>many of the original buildings appear to survive on site</i>”. It is considered that this is not fully representative of the historic significance of the site, as it is not clear that the buildings at the site are original.</p> <p>According to historic mapping the layout of the site appears to have changed little since the mid-19<sup>th</sup> century, but the individual buildings have been altered, and architecturally are very plain. There is no evidence that original buildings before this time have survived at the site.</p> <p>Mapping of the site between 1802 and 1841 indicate a row of four blocks and a number of ancillary buildings, however there is evidence that the barracks were rebuilt into their current 6 block layout and positions in 1856 when the site became a military hospital. Whilst the earlier maps (1802 - 1810) may be indicative rather than precise, it appears unlikely that maps from 1832, 1839 and 1841 all make the same mistake in their representation of five, rather than six barrack blocks, suggesting that the original blocks were demolished and rebuilt.</p>

# Representations to the Gosport Borough Council Draft Local Plan

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Page	Section	Para	Comment
189	Policy SS7: Haslar Barracks (cont.)	3.9	<p>Therefore although the buildings at the site may date to mid-19<sup>th</sup> Century, they are not surviving buildings from pre 1805 as suggested within the emerging Local Plan paragraph 3.9.1.</p> <p>Whilst it is and will be important to retain any heritage value at the site, it is recommended that precise details regarding the age or importance of the buildings at the site is removed from the Local Plan, as this needs further investigation.</p> <p><u>Use Class</u></p> <p>The policy currently states Use Classes C2 and/or C3 could come forward at the site. The most recent use of the site as an Immigration Centre falls within Use Class C2A (secure residential institutions). It is recommended that this use is included within Policy SS7 to reflect the existing use of the site and allow for continued or extended use of the current facilities. The following wording is therefore proposed:</p> <p><i>“Approximately 225 residential dwellings (either Class C2, <u>C2A</u> and/or C3) in a suitable mix of tenures and sizes;”</i></p> <p><u>Viability</u></p> <p>Within both the policy and supporting wording of the text it is noted that there are a number of buildings within the site, as well as significant security infrastructure, and the need to provide defence against both existing and future flood risk. As a result there are likely to be a number of abnormal costs associated with development at the site.</p> <p>The policy currently contains no mention of the viability of a proposed development at the site, however from the pre-application submission made to GBC in 2019 it is noted that retention of all of the existing buildings is unlikely to support a viable development at the site.</p> <p>Paragraph 201 of the NPPF states:</p> <p><i>“Where a proposed development will lead to substantial harm to (or total loss of significance of) a designated heritage asset, local planning authorities should refuse consent, unless it can be demonstrated that the substantial harm or total loss is necessary to achieve substantial public benefits that outweigh that harm or loss, or all of the following apply:</i></p>

# Representations to the Gosport Borough Council Draft Local Plan

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Page	Section	Para	Comment
189	Policy SS7: Haslar Barracks (cont.)	3.9	<p>a) <i>the nature of the heritage asset prevents all reasonable uses of the site; and</i></p> <p>b) <i>no viable use of the heritage asset itself can be found in the medium term through appropriate marketing that will enable its conservation; and</i></p> <p>c) <i>conservation by grant-funding or some form of not for profit, charitable or public ownership is demonstrably not possible; and</i></p> <p>d) <i>the harm or loss is outweighed by the benefit of bringing the site back into use”</i></p> <p>It does not appear that this has been considered within the allocation of Haslar Barracks within Policy SS7, as currently it does not appear possible to retain all of the buildings within the site. They also do not lend themselves well to future, viable, re-use given the single storey nature of the barrack buildings.</p> <p>It is therefore recommended that the following text is included within emerging Policy SS7:</p> <p><i>“In accordance with the NPPF, proposed development at the site which would lead to harm or loss of a designated heritage asset at the site must demonstrate that this is necessary to achieve substantial public benefits that outweigh the harm or loss, or that:</i></p> <p>a) <i>the nature of the heritage asset prevents all reasonable uses of the site; and</i></p> <p>b) <i>no viable use of the heritage asset itself can be found in the medium term through appropriate marketing that will enable its conservation; and</i></p> <p>c) <i>conservation by grant-funding or some form of not for profit, charitable or public ownership is demonstrably not possible; and</i></p> <p>d) <i>the harm or loss is outweighed by the benefit of bringing the site back into use”</i></p> <p>The inclusion of the above wording has been suggested in order to allow some discussion on the retention of heritage buildings at the time of a planning submission. Additionally it is proposed to ensure that the number of residential units referenced in the allocation allows future flexibility to be applied upon consideration of a planning application, enabling discussions around viability and deliverability at the time to ensure the site can come forward.</p>



# Representations to the Gosport Borough Council Draft Local Plan

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Page	Section	Para	Comment
230	Policy H1: Sustainable Residential Neighbourhoods	Policy H1	<p>With regard to the provision of self and custom build housing, not all sites will be suitable candidates for this provision due to site-specific constraints and viability.</p> <p>The following amended wording is therefore proposed for Policy H1:</p> <p><i>“4. Proposals for self and custom build housing, to be occupied as homes by those individuals, will be supported by the Council where they are in conformity with all other relevant local and national policies. On sites with 40 or more non-flatted market dwellings site promoters should <u>look to provide at least 2.5% of plots as self-build plots subject to site-specific constraints, requirements, and viability</u>” .</i></p>

### 3. Conclusion

- 3.1. This Statement has provided representations to Gosport Borough Council's (GBC's) Regulation 18 Draft Local Plan consultation, published in September 2021 on behalf of Ministry of Justice, and in support of the site promotion at the Former Haslar Immigration Removal Centre, Gosport.
- 3.2. Discussions relating to the future development of the site have been held with GBC Officers since 2019. Currently the future use of the site is unknown, however it is promoted for allocation within the emerging Local Plan for around 225 dwellings. The Former Haslar Immigration Removal centre offers the opportunity for a residential-led development in a sustainable location along the Gosport waterfront. This is recognised within the local plan which allocates the site for development in Draft Policy SS7, as part of the Gosport Harbour Regeneration Area.
- 3.3. Whilst there is support for many policies within the Draft Local Plan consultation documents, these representations have raised concerns regarding some of the details contained within the policies.
- 3.4. Most significantly there are concerns relating to the proposed departure from the Government's published standard methodology for housing need, which does not appear to be robustly evidenced by GBC's published documents.
- 3.5. Secondly many of the policies contained within the plan include repetition of other policies, meaning that the Draft does not appear to be prepared in accordance with Paragraph 16 of the National Planning Policy Framework (NPPF) (2021) which states:

*Plans should:*

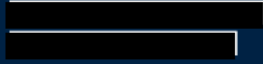
- A. be prepared with the objective of contributing to the achievement of sustainable development<sup>11</sup>;*
- B. be prepared positively, in a way that is aspirational but deliverable;*
- C. be shaped by early, proportionate and effective engagement between plan-makers and communities, local organisations, businesses, infrastructure providers and operators and statutory consultees;*
- D. contain policies that are clearly written and unambiguous, so it is evident how a decision maker should react to development proposals;*
- E. be accessible through the use of digital tools to assist public involvement and policy presentation; and*
- F. serve a clear purpose, avoiding unnecessary duplication of policies that apply to a particular area (including policies in this Framework, where relevant).*

[NPPF, 2021, Paragraph 16]

- 3.6. Finally, although pre-application discussions have been held with GBC and a policy is included within the Draft Local Plan for future development at the site, proposals have not been formally submitted. Therefore there are still a number of unknowns at the site, including costs associated with proposals, the exact quantum and mix of dwellings, sales values that could be achieved, and the potential for retention or re-use of the heritage assets at the site. As a result, minor modifications to the proposed wording of policies within the Draft Local Plan are sought to ensure that viable future proposals can come forward at the site and unlock the potential, and public benefits that a proposal will deliver.
- 3.7. These amendments include the removal of specific reference to heritage assets at the site and the inclusion of the current use (Use Class C2A) within the policy wording. Whilst it is and will be important to retain any heritage value at the site, it is recommended that precise details regarding the age or importance of the buildings at the site is removed from the Local Plan, as this needs further investigation.
- 3.8. The policy currently states either Use Classes C2 or C3 could come forward at the site. The most recent use of the site as an Immigration Centre falls within Use Class C2A (secure residential institutions). It is therefore recommended that this use is included within Policy SS7 to reflect the existing use of the site and allow for continued or extended use of the current facilities.
- 3.9. In conclusion, the inclusion of the revised wording has been suggested in order to allow for future flexibility in relation to proposals at the site, which would all be considered at a planning application stage.

**Bryony Stala**

Associate Director



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Associate

