



Historic England

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Our ref: PL00506682

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Date: 03/12/2021

Dear Mr Grygiel

## **Gosport Borough Local Plan 2038 Consultation Draft Regulation 18**

Thank you for inviting Historic England to comment on the above document. As the government's adviser on the historic environment, Historic England is keen to ensure that protection of the historic environment is fully taken into account at all levels and stages of the local planning process.

In general, the plan's approach to the historic environment is welcome. There are some areas where we consider that further work should be undertaken to support the plan and where we would appreciate further discussions with the council. We have provided detailed comments in Appendix 1. Links to our published advice and can be found in Appendix 2 to this letter.

Yours sincerely

**Edward Winter**

Historic Environment Planning Adviser



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## Appendix 1: Historic England’s detailed comments on Gosport Borough Local Plan 2038 Consultation Draft Regulation 18

Location	Historic England comments
POLICY D9: DESIGN	We support this policy, particularly its comprehensiveness.
POLICY D10: HERITAGE ASSETS	<p>Point 1 seems to suggest that a ‘new’ use will be preferred in order to conserve and enhance heritage assets. We do not believe this to be the intention behind the policy – a new may be preferable but this is not necessarily the case. We suggest this part of the policy is therefore revisited to clarify this.</p> <p>Points 2, 3 and 7 do not appear to be consistent with the tests set out in NPPF paragraphs 201-203. We recommend the council revisit these as this is likely to be considered an issue of <b>soundness</b>. We also recommend the provisions set out in NPPF paragraphs 204 &amp; 205 are incorporated into the policy.</p> <p>Heritage at risk is briefly discussed in paragraph 2.11.17. We would welcome some clarification as to the council’s approach to heritage at risk. Outside London, Historic England’s list of Heritage at Risk does not include grade II listed buildings, other than places of worship. We would like to see a statement as to whether the council intends to compile a list of grade II listed buildings it considers to be at risk.</p> <p>Point 6 states:</p> <p><i>“The Borough Council will aim to conserve and enhance the character or appearance of existing Conservation Areas and, where appropriate, produce and update Conservation Area Appraisals and identify additional Conservation Areas.”</i></p> <p>We welcome the above. However, we would also like to see a statement setting out when the conservation area appraisals in the borough were last reviewed and the council’s opinion as to whether any of these should be reviewed and when the council intends to carry out any such review work.</p> <p>Addressing our remarks regarding point 5 &amp; 6 will help the council to demonstrate that the plan sets out a positive strategy for the conservation and enjoyment of the historic</p>



Location	Historic England comments
	environment, including heritage assets most at risk through neglect, decay or other threats.
POLICY SS1: GOSPORT WATERFRONT – MARINE EMPLOYMENT	No comment
POLICY SS2: GOSPORT WATERFRONT – MIXED-USE  REDEVELOPMENT	Historic England would welcome the opportunity to discuss elements of this policy further with the council. A landmark building could, subject to its form, affect the settings of Bastion No.1 and Fort Blockhouse. It may be appropriate to introduce further safeguards into the plan, in order to protect any affected heritage assets.
POLICY SS3: GOSPORT TOWN CENTRE	<p>Gosport Lines etc</p> <p>With regard to Gosport Lines, including the Northern Ramparts, St George’s Field, Walpole Park and Bastion No.1, Historic England should be engaged in any proposals that would be within scheduled areas or affect their settings.</p> <p>In paragraph 3.4.13, we suggest the text is amended to also reference a ‘holistic interpretation strategy’, which, where this relates to schedule monuments, we would also request being involved.</p> <p>Gosport Town Centre</p> <p>The plan envisages: <i>“2 The delivery of approximately 550 new residential dwellings, primarily concentrated on the High Street and South Street”</i></p> <p>The plan does not appear to be clear about where these 550 new residential dwellings will be located, or what form it will take. Therefore, this would appear to render this part of the plan <b>unsound</b>. This is because it is inconsistent with national policy. NPPF paragraph 31 states that:</p> <p><i>“The preparation and review of all policies should be underpinned by relevant and up-to-date evidence. This should be adequate and proportionate, focused tightly on</i></p>



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	<p><i>supporting and justifying the policies concerned, and take into account relevant market signals.”</i></p> <p>In order to rectify this, the plan should make it clear where the proposed 550 dwellings would be located, and the form they would take.</p> <p>Land at Gosport Bus Station</p> <p>We understand that the figure of 150-240 comes from an initial planning appraisal. However, the plan itself should clarify the evidential basis for this figure.</p> <p>We support the below policy requirements:</p> <p><i>“The impact of development on adjacent public spaces; ii. The retention of an open axis between the High Street and the ferry pontoon”.</i></p> <p>In addition, we would recommend a further clause that the setting of the conservation area is enhanced. This is because the site has the potential to enhance the setting of the conservation area and attention should be drawn to this, over and above the main policies for the conservation and enhancement of the historic environment, elsewhere in the plan.</p>
POLICY SS4: BLOCKHOUSE AND HASLAR GUNBOAT SHEDS	We support this policy as set out.
POLICY SS5: FORT BLOCKHOUSE	We support this policy as set out.
POLICY SS6: ROYAL HASLAR HOSPITAL	No comment
POLICY SS7: HASLAR BARRACKS	We have some concerns about this allocation. We are not clear on the evidential basis for reuse of buildings for up to 225 dwellings, including redevelopment of existing buildings resulting in approximately 54 units and new development on the field.

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	<p>The plan should justify this amount through appropriate evidence, including a heritage impact assessment. Without such evidence, we consider this policy to be <b>unsound</b>. This is because it is inconsistent with national policy. NPPF paragraph 31 states that:</p> <p><i>“The preparation and review of all policies should be underpinned by relevant and up-to-date evidence. This should be adequate and proportionate, focused tightly on supporting and justifying the policies concerned, and take into account relevant market signals.”</i></p> <p>In order to rectify this, the policy should be supported by an appropriate evidence base.</p>
POLICY SS8: THE PIGGERIES	<p>We would welcome the introduction of maximum building heights as part of this policy, such as 2.5 storeys. This is in order to respect the low scale of the surrounding landscape. We suggest that criterion c on pedestrian access could be developed further.</p>
POLICY SS9: HASLAR MARINE TECHNOLOGY PARK	<p>The supporting text states:</p> <p><i>“Proposals will need to conserve and enhance the site’s historic assets.”</i></p> <p>Heritage assets outside the site could also be affected, so we suggest the above is amended to:</p> <p><i>“Proposals will need to conserve and enhance any affected heritage assets.”</i></p> <p>We would also welcome a requirement for new development to be kept low in scale, in order to respect the wider landscape character of the area.</p>
POLICY SS10: ROWNER AND HMS SULTAN	<p>We support the policy approach as set out, at this time.</p>
POLICY SS11: DAEDALUS	<p>We support the policy as set out.</p>

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POLICY A1: ENABLING ALLOCATIONS	We support the approach to this policy. The identification of these heritage assets as potentially suitable for residential or alternative mixed-use scheme, provided the assets are conserved and enhanced, will help to reduce the economic risk associated with positive re-uses of these heritage assets.
Fort Gilkicker, Stokes Bay	We support the policy as set out.
Qinetiq Fort Road	We support the policy as set out.
POLICY A2: HOUSING	See below
Land at Heritage Way and Frater Lane	No comment
Land at Gasworks Site, Mariners Way	No comment
Land at Addenbrooke House, Willis Road (Existing permission)	No comment
Anglesey Lodge, Alverstoke (Existing permission)	No comment
Land at Stoners Close, Bridgemaury	No comment
Land at Laphorn Close, Bridgemaury	No comment
Land at Prideaux- Brune Avenue, Bridgemaury	No comment
Land at Rowner Road Service Station, Bridgemaury	No comment



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Land at Forton Road, Forton	No comment
Land at Wheeler Close, Forton	No comment
Land at Whitworth Close, Leesland	No comment
Land between Woodside and Wych Lane, Bridgemaury	No comment
Land at Bridgemaury Road, Bridgemaury	No comment
Land at Montgomery Road, Bridgemaury	No comment
Land at Grove Road, Hardway	No comment
POLICY DE4: AREAS OF SPECIAL CHARACTER	We support the policy as set out.



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## Appendix 2: Historic England's published guidance and general advice

Historic England has published planning advice which we recommend that you review as part of your plan preparation.

### Good practice advice

- The Historic Environment in Local Plans  
<https://historicengland.org.uk/images-books/publications/gpa1-historic-environment-local-plans/>
- Managing Significance in Decision-Taking in the Historic Environment  
<https://content.historicengland.org.uk/images-books/publications/gpa2-managing-significance-in-decision-taking/gpa2.pdf/>
- The Setting of Heritage Assets  
<https://content.historicengland.org.uk/images-books/publications/gpa3-setting-of-heritage-assets/gpa3.pdf/>
- Enabling Development  
<https://historicengland.org.uk/images-books/publications/gpa4-enabling-development-heritage-assets/>

### Historic England advice notes

- Conservation Area Appraisal, Designation and Management  
<https://historicengland.org.uk/images-books/publications/conservation-area-designation-appraisal-management-advice-note-1/>
- Making Changes to Heritage Assets  
<https://historicengland.org.uk/images-books/publications/making-changes-heritage-assets-advice-note-2/>
- The Historic Environment and Site Allocations in Local Plans  
<https://historicengland.org.uk/images-books/publications/historic-environment-and-site-allocations-in-local-plans/>
- Tall Buildings  
<https://historicengland.org.uk/images-books/publications/tall-buildings-advice-note-4/>
- Local Heritage Listing  
<https://www.historicengland.org.uk/images-books/publications/local-heritage-listing-advice-note-7/>
- Sustainability Appraisal and Strategic Environmental Assessment  
<https://historicengland.org.uk/images-books/publications/sustainability-appraisal-and-strategic-environmental-assessment-advice-note-8/>

All Historic England advice should be read alongside our Conservation Principles, which underpin our work <https://historicengland.org.uk/advice/constructive-conservation/conservation-principles/>



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