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Our ref 486500/LON
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2nd December 2021

Dear Sir/Madam,

**DRAFT GOSPORT BOROUGH LOCAL PLAN 2038
DEFENCE INFRASTRUCTURE ORGANISATION | FORT BLOCKHOUSE**

JLL are writing on behalf of the Defence Infrastructure Organisation ('DIO') to formally comment on the Draft Gosport Borough Local Plan 2038, in respect of the above site. Fort Blockhouse has been identified for disposal as part of MOD plans to invest in modern, fit for purpose and more sustainable facilities. The disposal of the site will not be before 2023. The disposal is being delivered by the Defence Estate Optimisation (DEO) Portfolio, which is an ambitious 25-year portfolio of interdependent programmes, construction activity, unit and personnel moves, and land release.

There are three parcels of land comprising Fort Blockhouse. Fort Blockhouse 1 includes the Submarine Escape Training Tank facility and 5 Lodger Units, occupying several areas within the site. The buildings are generally in poor condition, beyond their design life, many now redundant.

Fort Blockhouse 2 is primarily occupied by Navy Command with a submarine museum, Hornet Sailing Club, and Joint Services Adventurous Sailing Training Centre (JSASTC). Fort Blockhouse 3 is on the opposite side of Haslar Road. The largest proportion of this site is leased to Hornet Sailing Club, with some provision of parking for JSASTC. The Gatehouses are of specific historic interest and are currently receiving significant refurbishment.

In light of the above, the DIO fully supports the inclusion of Fort Blockhouse within the Draft Local Plan. We also welcome recognition of the important role this site could play in future regeneration and development within the Gosport borough. This letter sets out the opportunities and constraints for the redevelopment of Fort Blockhouse in context of the Draft Local Plan and supporting evidence base, setting out key comments.



Draft Local Plan 2038

The Draft Local Plan cites a number of key principles which include maximising development in urban and city areas first; focusing development where there are opportunities for sustainable travel modes; supporting balanced delivery of housing sites of different sizes; protecting the countryside to prevent urban sprawl; and locating development to protect environmental designations.

Gosport's assessed need for new homes is noted as 5,576 between 2021 and 2038 although we note the Draft Local Plan advises that 3,500 is a more realistic number to target for delivery. It states that it is important new homes are actually affordable to residents.

Regarding employment, the Plan notes that existing employment areas are generally built to capacity. Key growth sectors are identified as private & public services, transport & storage, and construction, with manufacturing declining. It is expected that 77,500 sqm is needed of employment floorspace to 2036. Blockhouse is identified as an appropriate area which could contribute to employment use.

Growth is noted to be constrained by the peninsula location and amount of land in active military use. It states, "Large areas, previously used by the MoD, require significant investment and are more complex to redevelop."

Within the Draft Local Plan, Plan no 14: Haslar Peninsula outlines a series of strategic development sites. The DIO site Fort Blockhouse forms part of three named strategic sites. Each has its own policy as set out below:

- Policy SS1: Gosport Waterfront – Marine Employment
- Policy SS4: Blockhouse and Haslar Gunboat Sheds
- Policy SS5: Fort Blockhouse

Plan no 15: Blockhouse Parameters Plan sets out indicative parameters across the above mentioned three policy areas.

The DIO has its own indicative map which also separates Fort Blockhouse into three areas. The initial focus is Fort Blockhouse 1 (area shaded in red below) and the plans for its redevelopment are being prioritised.

Below: DIO Indicative Map showing Fort Blockhouse areas 1, 2 and 3. The extent of land ownership will be confirmed with the Council at a later date.



You will see from the DIO map that the boundaries differ to those set out in the Council's Plans 14 and 15. For simplicity and accuracy, it is suggested that the Council's Plans are amended to align more closely with the DIO Plan boundaries above. We are keen to discuss this in more detail.

To ensure that regeneration of Fort Blockhouse moves forward, the DIO have been working up a draft Vision and Masterplan for the area which prioritises Fort Blockhouse 1. A specific Masterplan for Fort Blockhouse 2 and 3 has not yet been drawn up. The DIO therefore needs to maintain flexibility on what these areas come forward for and cannot commit to specified uses at present. However, housing and employment to drive value is a priority together with de-risking the site, the protection of heritage assets and provision of open space.



Masterplan Vision

The DIO have commenced engagement with Gosport Borough Council (GBC) and have had some positive discussions on future aspirations for Fort Blockhouse. The DIO are working with GBC on the planning and political context and will be sharing more detailed reports as they become available and as the draft Local Plan process progresses.

The DIO are keen to understand the constraints, especially the Haslar Bridge and wish to explore all investment and funding routes. In addition to GBC the DIO is working collaboratively with other key stakeholders and interested parties.

PRP Architects have produced a draft Vision for development incorporating a strategic masterplan concept for the site.

The masterplan includes opportunities for:

- approximately up to 750 new homes including a mix of housing typologies, tenures and affordability (subject to viability);
- a range of jobs and business opportunities through the provision of community facilities, tourism and leisure, marina facilities and the delivery and maintenance of the development;
- hotel and leisure facilities, bars, cafés, restaurants, heritage and learning led tourist attractions, arts and culture led workshop and studio space, residential and high quality amenity spaces;
- Safe and convenient walking and cycling routes to link with the existing network creating a highly permeable and connected community;
- military heritage of the site to be fully integrated into the design of the new development through retaining and enhancing buildings of historical value;
- Delivery of net gains to biodiversity, whilst maintaining ecological functionality of species and habitats. Integration and enhancement of key features of the site, promoting access to nature whilst ensuring recreation does not lead to habitat degradation.

The Strategic Sites policies

Policy SS1: Gosport Waterfront – Marine Employment

The DIO supports the intentions to enhance and intensify Gosport Waterfront, making it more accessible. This will help to support maritime industry and leisure activities which form an important part of the area's history and overall regeneration. We notice these intentions are in line with the Infrastructure Assessment Report (IAR) September 2021.

Plans 14 and 15 show that a small part of SS1 overlaps into Fort Blockhouse 1, where DIO's current Vision document includes opportunity for residential. We ask that flexibility in uses at this location is allowed to enable delivery of the masterplan vision and uses which support the viability of the site coming forward.



Policy SS4: Blockhouse and Haslar Gunboat Sheds

The Parameters Plan for SS4 broadly aligns with the masterplan indicating residential uses towards the sea front. There is a large area allocated to the rear of this for strategic open space. In line with the masterplan we would like to see some flexibility in provision of open space. It may be that this is better set out as a series of spaces to provide a more interesting and adaptable layout for residential uses.

The mixed use neighbourhood centre and strategic surface vehicular parking area are located in Fort Blockhouse area 2. Limiting this area's use to car parking and a neighbourhood centre could prevent future deliverability of this site and Fort Blockhouse 3. We would like to understand if these uses are essential and to consider flexibility of alternative uses in the future.

Point 3 of Policy SS4 states that 'redevelopment of Blockhouse should be in accordance with a Strategic Masterplan to be agreed between the Local Planning Authority and the Site Promoters.' It sets out a number of principles which the Masterplan should follow. Section a) of point 3 refers to reflecting the principles set out in the Blockhouse Parameters Plan. As stated above, the Blockhouse Parameters Plan boundaries do not match the DIO's area boundaries to Fort Blockhouse 1, 2 and 3. These need to align to avoid any confusion and assist deliverability.

We support the provision of fully accessible pedestrian and cycle routes which will form a key part of any future planning applications across the Fort Blockhouse area.

Policy SS5: Fort Blockhouse

We support the suggestions of heritage led regeneration and have had a detailed Heritage report produced. This provided vital background evidence to help inform our Masterplan. We agree that residential and viable town centre or sui generis uses are appropriate for this location in re-use of assets.

In relation to point 2 we ask that demolition and redevelopment of "undesignated" buildings of historic interest may be considered acceptable subject to a supporting assessment which demonstrates reasoned justification for its demolition and redevelopment. There are cases where the best solution for undesignated buildings is redevelopment. This should be on a case by case basis.

In relation to Point 3, DIO's emerging Masterplan currently indicates that the area of Buildings 64 and 65 may be best suited for residential use, combining new build and potential re-use of buildings. We therefore do not wish to be bound to providing formally landscaped public open space at this location.



Local Plan 2038 Supporting Evidence documents

Economic Development Needs Assessment and Economic Land Availability Assessment

This study notes that Fort Blockhouse has strong potential to provide additional B class employment. It suggests that Fort Blockhouse is protected for employment uses, especially for marine industry and office uses but recognises other uses are likely to form a part of any redevelopment of the site. The study also recommends a Masterplan for the site.

As stated, DIO have worked up a Masterplan and had a number of discussions with the Council. The Masterplan includes employment opportunities alongside other uses including residential, visitor accommodation, commercial, marine complementing existing assets around the site. Some employment use across the site is therefore supported.

Strategic Housing Land Availability Assessment (SHLAA)

The SHLAA, states that significant parts of Fort Blockhouse, especially those near to Portsmouth Harbour, should be retained and maximised for employment uses. Other parts are stated to be considered suitable for mixed uses including circa 325 dwellings. It is suggested that the 325 dwellings should be concentrated on the site parallel to the Solent (area SS4 on the Strategic Development Sites map). For area SS5, up to approximately 150 dwellings are suggested in addition to other viable retail/leisure uses. The 150 unit figure is based on re-use of heritage assets.

Due to the location in the Conservation Area the SHLAA also states that no buildings should exceed the height of the listed escape tower.

The SHLAA notes that the Council will take a positive approach to suitable, viable uses in which heritage is sustained/ enhanced, e.g. marine employment, leisure uses, open air sales.

In response, the DIO confirms its draft Vision document includes provision for employment uses alongside residential. Any new build development will fully respect the site's heritage status and listed buildings/ buildings of historic significance. We suggest that the quantum of residential units and other land uses remains flexible to ensure viable regeneration can be brought forward.

Infrastructure Assessment Report (IAR) Sept 2021

The IAR notes areas SS1, SS4 and SS5 as regeneration areas. It recognises that significant highway improvements will be severely constrained on the Haslar Peninsula due to the limited road network to the west and limitations on the bridge itself. It states that other transport options and travel planning are likely to be required as part of mitigation.

It encourages active travel with associated infrastructure improvements for walks/ cycling as well as exploring opportunities for water transport, park and ride/ walk schemes, improved bus provision, and a land train option. Specifically, it mentions the intention for improved pedestrian/ cycle access



along the shoreline of Blockhouse and Fort Blockhouse. The existing Solent Way and England Coast path are planned to be re-routed through Blockhouse and away from the enclosed Haslar Road.

Hampshire County Council (as Highway Authority) consider new development on the Haslar Peninsula, including Blockhouse, should not result in significantly more traffic than that arising when the sites were fully occupied by MoD. It's noted the scale of development will need to be kept within the capacity of the current bridge and highway network.

Feasibility of a regular land train between the Ferry and the town centre and Haslar Peninsula to help deliver Blockhouse regeneration should also be considered.

The report supports expansion of the existing Navy submarine Museum and potential for alternative uses for the listed SETT. Upgrade of the seawall is also noted as likely to be critical and may require external funding due to viability.

In response to the above, the DIO notes the current transport limitations. Transport capacity is being considered alongside the future vision. The DIO supports enhancement of existing sustainable travel options and opportunities for new options. Alongside this, it believes any improvements to the road network and Haslar Bridge is key to boost regeneration in the Blockhouse areas. The DIO is however mindful of the need to ensure that past traffic levels (when the sites were fully occupied by MoD) are not exceeded.

Other planning policies

Policy D3: Urban regeneration areas

We understand that Fort Blockhouse falls within the Harbour regeneration area under the sub area "Haslar Peninsula."

Paragraph 2.4.19 states, "Planning permission will not be granted for incremental development that would unacceptably hamper or reduce the development options for that wider area. This applies specifically to sites that would compromise the delivery of Blockhouse, Fort Blockhouse and the Haslar Gunboats Yards which have a degree of interdependence, despite being in different ownership as of 2021."

We support the above statement in ensuring that other incremental development does not unacceptably hamper the delivery across the Fort Blockhouse area (as shown on the DIO indicative map).

We also support paragraph 2.4.21 which states, "Within the Haslar Peninsula, Rowner and Daedalus it is anticipated that there will be greater scope for providing a broader mix of residential typologies." We believe it important to provide a mix of residential property although this should be informed by market demand.



Policy D11: Securing Infrastructure

Point 2 states that, “in determining the appropriate level of infrastructure required for both site-specific and off-site measures, the highest priority will be given to the following types of infrastructure:

- a) Flood Risk Management Measures
- b) Transport Infrastructure including public transport, walking, cycling, where appropriate highway improvements and electric vehicle charging points and associated facilities;”

It lists a number of other types of infrastructure but we’d like to highlight flood risk management and transport as key to the Fort Blockhouse area. Funding to improve the sea wall will be required and improvements to the road network and Haslar Bridge to support delivery of regeneration at Fort Blockhouse are key.

Conclusion

The DIO is pleased to see Fort Blockhouse noted as a Strategic development site within the Draft Local Plan. Its release for development has been formally announced and the DIO are currently undertaking further studies and appraising potential options for the site. Viability and deliverability are key so it is important that the emerging policy is flexible on what is required for the site.

It is recommended that the Council’s Plans 14 and 15 are adapted to more closely align with the DIO’s indicative map, which divides the Fort Blockhouse area into three parcels of land. Fort Blockhouse 1 is the priority for redevelopment.

In respect of the key policies SS1, SS4 and SS5, the DIO supports enhancement and intensification of Gosport Waterfront; sustainable travel and improved pedestrian routes; flexibility of uses; and protection of the area’s heritage. It does however ask that in considering the future use or demolition of any undesignated buildings of historic interest in the Conservation area, that these are looked at on a case by case basis. Further studies and evidence may show that the best option for some of these buildings is redevelopment.

The DIO looks forward to continuing to work together to deliver a successful future for this strategic site. If you require any additional information or would like to discuss any of the above, please do not hesitate to contact Pippa Nisbet on [REDACTED] or Polly Butlin [REDACTED]. We look forward to receiving acknowledgment of our submission.

Yours faithfully,

[REDACTED]

Pippa Nisbet
Director - Planning & Development

30 Warwick Street
London W1B 5NH

T: [REDACTED]

[REDACTED]

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

This form should be returned by email or post by Friday 3rd December 2021

Please email to: 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 Telephone: 023 9254 5461

Your details

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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.

Paragraph/Policy Number: <u>SS1</u>	Support/Object (please tick): <input checked="" type="checkbox"/> Support <input type="checkbox"/> Object
Please summarise why: Support in general, subject to detailed comments within JLL's accompanying letter.	

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Paragraph/Policy

Number: D3

Support/Object
(please tick):

Support

Object

Please summarise why:

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Object

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Support in general, subject to detailed comments within JLL's accompanying letter.

Paragraph/Policy

Number: _____

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Please summarise why:			

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

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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