

Appendices

Appendix A

MP letter to the Home Secretary, 9 March 2015

Letter concerning the previous Campsfield expansion proposal, including concerns about Green Belt development, claimed detention capacity need, and whether an immigration removal centre could properly be treated as high-value employment use.

Appendix B

MP letter to, Principal Planning Officer, Cherwell District Council, 18 November 2014.

Letter objecting to the previous Campsfield expansion planning application, including concerns about Green Belt development, the Home Office's claimed need case, traffic and transport, drainage, environmental impacts, ecology, healthcare, access to legal advice, design and facilities, management issues, and the suitability of the proposed expanded detention centre.

Nicola Blackwood MP



HOUSE OF COMMONS

LONDON SW1A 0AA

The Rt Hon Theresa May MP
Secretary of State for the Home Department
Home Office
Direct Communications Unit
2 Marsham Street
London
SW1P 4DF

Our Ref: ZA1362

9 March 2015

Dear Theresa

I am writing again with regard to Home Office proposals to expand Campsfield House Detention Centre in my constituency, which is due to come before the Planning Committee of Cherwell District Council next Thursday, 19th March.

I have been clear on my position that the expansion of Campsfield House, which would more than double it in size making it one of the largest detention centres in Europe, should not go ahead. I have explained my serious concerns to the Minister of State for Immigration and to yourself both formally and informally, and I feel strongly that the Home Office must withdraw this ill-conceived proposal as a matter of urgency.

I have raised, both throughout the planning process and before the application was submitted, a number of serious problems with the plans which I do not feel the Home Office has addressed. These are concerns that have also been raised on a number of occasions by the Independent Monitoring Board (IMB) and several local campaign groups. I will summarise them again here for clarity.

Firstly, Kidlington has an acute shortage of land for residential and business development, and the detention centre will extend on to Green belt land. The District Council's Local Plan identifies small scale Green Belt review of this land, but is clear this would specifically be for 'higher value employment uses such as high technology industries in the research and development sector'. It is impossible to describe a Detention Centre as a high technology industry, and so while I am aware the Home Office have had to demonstrate 'exceptional circumstances' in order to build on Green Belt land, primarily due to the 'Need' for extra capacity in the detention system, I do not believe these are justified.

I have specific concerns about the design of the building itself and how it will work practically to ensure a relaxed regime commensurate with security and in line with the Detention

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Centre Rules (2001). The new facility is intended to run alongside the existing Centre, with some amenities and facilities duplicated in the new extension and others to be shared. However the Complex will be under single management and the plans show it will not be possible for detainees to move freely between the old building and the new building. The IMB is rightly concerned that this lack of free flow movement, along with some facilities based in one part of the centre but not duplicated in the other, could result in a reduction in detainee access to facilities, or limited and 'timed' access, and ultimately lead to a 'two tier' complex which will give rise to disturbances. Clearly, this would result in higher costs in the end. There are also concerns raised by local Councils and Thames Water such as traffic implications and drainage and sewage concerns.

You will be aware that a decision on the planning application has recently been deferred by the Council due to the need to take legal advice following the Planning Officer's recommendation for approval, and suggestions that the need for expansion had not been properly assessed. I simply do not see how the planning application can be allowed to proceed with this ongoing uncertainty, and particularly due to the issues outlined above.

To be clear, while I do believe detention plays a necessary role in our immigration system, detention centres must be sensitively designed and appropriate to their location. The plans for Campsfield House are neither; they will not work for detainees nor for local residents, and I urge you to withdraw this application.

I look forward to receiving your response as a matter of urgency.

Best wish


Nicola Blackwood MP
Member of Parliament for Oxford West & Abingdon

Mr P Ihringer
Principle Planning Officer
Cherwell District Council
Bodicote
Banbury
Oxfordshire
OX15 4AA

18 November 2014

Dear Mr Ihringer

Re: Planning application 14/01778/F

I am writing as the local Member of Parliament to submit my formal objections to the planning application for extension at Campsfield House Immigration Removal Centre, Langford Lane, Kidlington. The proposed development will make Campsfield House one of Europe's largest detention centres, by doubling the size of the current centre to include *"additional and enhanced detainee accommodation, ancillary detainee and staff facilities, car parking, landscaping and internal fencing"*.

I have been contacted by a number of local residents and interest groups, including the Independent Monitoring Board (IMB), wishing to share their concerns about the proposals. The vast majority of those who have contacted me have been unequivocally opposed to the plans.

As well as meeting with members of the IMB at Campfield House I have also met with local residents at my surgeries, I have spoken with Home Office officials and MITIE staff at a public exhibition, I have attended a public meeting about the plans, and have spoken with various local and national interest groups about the detail of the proposals. In my role as Member of Parliament I have previously met with and made representations on behalf of individual detainees, and I have raised the issues surrounding this planning application in the House of Commons on a number of occasions over recent months both in the Chamber and in person with Ministers.

From these discussions it is clear to me that there is widespread local concern about this planning application, both in terms of its impact on the local area and on detainees, and there is cross-party consensus that the proposal should be rejected on the basis of the strong planning objections outlined below.

Clearly this application is controversial locally, in part because some long standing local campaign groups oppose detention in principle and believe Campsfield House should close entirely. Obviously, however, any decision on this application must be made purely on planning grounds. And in this context, it is important that all opposition to the expansion is not dismissed simply as opposition in principle to detention. I have always been clear that I believe that detention is a necessary part of our immigration system, however, I am entirely unconvinced by the Home Office's argument on 'Need', their case for building on the Green belt, and the appropriateness of their centre design.

Having listened carefully to the views expressed by local people and by the Independent Monitoring Board I wish to set out my objects to the application, which relate primarily to the following areas:

- Development on Green Belt land;
- The perceived 'Need' for the extension;
- Traffic and Transport;
- Environmental factors and Ecology;
- Design and facilities

I have outlined in further detail below the specific details of my objections.

GREEN BELT

The site of the proposed development is within the Oxford Green Belt.

The National Planning Policy Framework (NPPF) places a clear duty on local authorities to take account of the particular characteristics of the area concerned, and not to approve development that will harm the Green Belt, except in exceptional circumstances.

I do not believe the Home Office have demonstrated exceptional circumstances in this case, this proposal represents inappropriate development on Green Belt land.

The Home Office argue that the 'exceptional circumstances' requirement has been met due to 'overriding need', claim that their application is in line with Cherwell's Local Plan *Policy Kidlington 1: Langford Lane Technology Park* regarding small scale Greenbelt review for employment purposes and assert there are no other suitable sites.

This is not the opinion of local people or of local Parish Councils.

Kidlington Parish Council in particular have voiced their opinion that that the 'Need' as set out in the Planning Statement does not justify building on our Green Belt. The 'Oxford Green Belt Network,' in their submission to the public consultation, make the important point that in looking at alternative sites, the applicant appears only to have looked at sites in Home

Office ownership, not sites in Government or public ownership or where a long term lease could be obtained. Further concerns have also been raised by local residents that the expansion will harm the openness of the surrounding land, which acts as a buffer for Begbroke.

Kidlington has an acute shortage of land for residential and business development, therefore, the only local justification for developing Green Belt sites can be for the benefit for business growth or for desperately needed housing. The Strategic Housing Market Assessment (SHMA) has found that here in Oxfordshire we must build 100,000 homes in the county by 2013; 22,800 of these in the Cherwell district to keep up with our growing economy, population growth and jobs growth. As the local Member of Parliament, I am contacted by a number of people, including teachers, nurses, social workers etc, who are struggling to find somewhere to live in the county due to the impossibly high prices of local housing.

I will go into further detail below about why I believe the Home Office case of 'overriding need' does not meet the 'exceptional circumstances' threshold necessary to justify building on the Greenbelt in this location.

Local Plan Policy on Greenbelt Release

The Planning Statement submitted by the Home Office to the Council states that *'the area in which the site is located has been identified by the Council for release from the Green Belt for employment purposes'*, and this is again referred to later on within the application, *'it is clear that the Council in principle deem the area as an appropriate location for release from the Green Belt.'*¹ This is misleading. In fact, according to Cherwell District Council Local Plan, the small local Green Belt review in question is solely to allocate land for *'higher value employment uses such as high technology industries in the research and development sector'*. It is impossible to describe a Detention Centre as a *'high technology industry in the research and development sector'* and it is worth quoting the exact detail from the Local Plan regarding this Greenbelt review in order to demonstrate the full extent of this application's failure to accord with the intentions of the Council for this valuable section of Greenbelt land:

What will Happen and Where

C.191 *There is a major potential for Cherwell to start to diversify its economic base by taking advantage of its location on the hi-tech corridor between London and Cambridge, with close proximity to Oxford University and Silverstone which is actively investing in the High Performance Engineering sector. Both Bicester and Kidlington have the potential to capture this investment.*

¹ Planning Statement, paragraph 6.26.

C.192 Kidlington plays an important role in the district's wider employment context and along with Begbroke has the potential to develop further to support the provision of land for hi-tech university spin-outs and help pave the way for a wider high value, economic base. Within this area lies Oxford: London Airport which includes another employment cluster. The Employment Land Review identified a need for additional land to be allocated for employment use. The Council proposes that in order to meet this need a local Green Belt review will be undertaken in preparing the Development Management DPD in the vicinity of London Oxford Airport as illustrated in the Proposed Submission Policies Map and Kidlington map (See ['Policy Kidlington 1: Langford Lane Technology Park'](#)).

C.193 Kidlington is "inset" within the Green Belt. In accordance with ['Policy SLE 1: Employment Development'](#), sites subsequently allocated for employment development will be outside of the Green Belt boundary. It is recognised that Kidlington has a very different economic role from the other villages in the district, and accordingly, the need for more employment land is likely to be higher. If there is clear evidence that an identified need cannot be met by a site within the village (i.e. outside of the Green Belt), the Council will need to consider reviewing Green Belt boundaries. Any such case would need to demonstrate the special circumstances why the land should be removed from the Green Belt for employment purposes.

Strategic Development: Kidlington 1 - Langford Lane Technology Park

C.194 Langford Lane is the location of a large industrial estate at Kidlington, which in recent years has become a location for a wide range of commercial uses. In the light of the economic analysis which informs this Local Plan there is a need for some additional employment land at Kidlington. To secure this additional employment land we propose to undertake a small scale local review of the Green Belt in the Langford Lane area (see ['Policy ESD 14: Oxford Green Belt'](#)).

C.195 Over the medium to longer term, progressive improvements to the Langford Lane employment area will be encouraged to accommodate higher value employment uses such as high technology industries. This will reinforce and strengthen the emerging cluster of such industries in this area adjoining London Oxford Airport.

Policy Kidlington 1: Langford Lane Technology Park

We will undertake a small scale local review of the Green Belt to accommodate identified employment needs at Kidlington.

The review needs to consider how to accommodate higher value employment uses such as high technology industries in the research and development sector.

Subject to the outcome of the small scale local review of the Green Belt the following design and place shaping principles will be applied:

- *Design for buildings that create a gateway with a strong sense of arrival from the airport and to the industrial estate*
- *Layout of development that enables a high degree of integration and connectivity between new and existing development, including surrounding employment areas and services, including through the provision of footpaths and cycleways that link with existing networks*
- *Good accessibility to public transport services should be provided for*
- *A Travel Plan should accompany any development proposals*
- *A well designed approach to the urban edge, which achieves a successful transition between town and country environments*
- *Development that respects the landscape setting of the site*
- *A comprehensive landscaping scheme to enhance the setting of buildings onsite and to limit visual intrusion into the wider landscape*
- *Public art will need to be provided for*
- *A development that preserves and enhances biodiversity, with the enhancement, restoration or creation of wildlife corridors*
- *A high quality design and finish, with careful consideration given to layout, architecture, materials and colourings to create a Technology Park for high value employment uses.*
- *The height of buildings to reflect the scale of existing employment development in the vicinity*
- *Provision for sustainable drainage, including SuDS, in accordance with [‘Policy ESD 7: Sustainable Drainage Systems \(SuDS\)’](#) and taking account of the Council's Strategic Flood Risk Assessment*
- *Demonstration of climate change mitigation and adaptation measures including exemplary demonstration of compliance with the requirements of policies ESD1 – 5*
- *An assessment of whether the site contains best and most versatile agricultural land, including a detailed survey where necessary*
- *A soil management plan may be required to be submitted with planning applications to ensure that soils will be retained onsite and used where possible.*

I cannot see how this Local Plan Policy, calling for ‘*higher value employment uses such as high technology industries in the research and development sector,*’ could possibly be interpreted to include employment at an Immigration Removal facility.

NEED

The Home Office has been clear on its belief that its case for ‘Need’ far outweighs the need to protect the Green Belt. However, the Home Office ‘Need’ case, set out in the ‘*Strategic Priorities of the Home Office*’ report, is widely disputed.

Detention Capacity in the Estate

The Home Office argues that there is an ‘overriding need’ for expansion at Campsfield House because the number of spaces within the UK detention estate must increase to 5,000 in order to manage detainee numbers. However, as of 11 November 2014, the detention capacity in the UK is 3,915 spaces² which represents an increase of 1,245 since 2010.³

The Home Office also has a Service Level Agreement with the National Offender Management Service (NOMS) in 2012 to allow for 1,000 prison bed spaces to be used for immigration detention purposes. This means that the total capacity for detention under immigration regulations is already approximately 5,000.⁴

It is therefore hard to be convinced by the Home Office argument on need based purely on current space and occupancy in the detention estate.

Efficiency and Operational Failings in the Immigration & Asylum System

The Home Office Business Plan objectives⁵ states the Home Office is aiming to ‘*develop and implement a new detention strategy, as part of our modernisation programme to improve the use and efficiency of our detention estate*’.

However, ‘*efficiency*’ in the immigration system will not be achieved by increasing the number of detention spaces but rather by speeding up decision making on immigration and asylum applications and by improving the quality of those decisions so that they are not overturned on appeal, leading to lengthy delay and litigation.

I have been a member of the Home Affairs Select Committee in the House of Commons, a crossparty committee of MPs who scrutinize Home Office policies including immigration and asylum policies, for over four years. The Select Committee not only produce quarterly scrutiny of the performance of the Home Office on implementation of immigration policy but we have also conducted a ten-month inquiry into asylum, publishing recommendations to the Home Office in October 2013.⁶

Our most recent report on the Immigration Directorate was published on 22 July 2014, and found that the Home Office have ample room for improvement where it comes to speeding up and improving the quality of decision making:

² James Brokenshire MP, 17 November 2014, [Written PQ](#).

³ James Brokenshire MP, 17 November 2014, [Written PQ](#).

⁴ Jeremy Wright MP, April 2014, [Written PQ](#).

⁵ Strategic Priorities of the Home Office: Needs Case for Proposed Extension at Campsfield House.

⁶ HASC, Seventh Report, Asylum, [October 2013](#).

New asylum cases ⁷

- There were 7,513 applications were made for asylum (main applicant and dependents) in Q4 2013.
- 3,964 initial decisions were made in Q4 2013, a substantial fall from 5,421 initial decisions in the previous quarter. 38% of the initial decisions were grants (some of these decisions may related to applications made in previous quarters).

Asylum applications pending initial decision - Worse performance ⁸

- The chart below shows that 23,070 asylum applications were pending an initial decision in Q4 2013, up from 20,809 in the previous quarter.

Asylum applications pending initial decision for more than 6 months – Worse performance⁹

- There has been a rise in the proportion of cases waiting more than 6 months for an initial decision. In Q4 2013 37% of cases had waited more than 6 months.

Immigration appeals ¹⁰

In the Q4, 44% First Tier Tribunal (Immigration and Asylum Chamber) appeals were allowed down from 45% in the previous quarter

In Q4 2013, the proportion of successful asylum appeals at First Tier Tribunals was 29%, up from 28% in the previous quarter.

Removing Foreign National Offenders - Worse performance ¹¹

- It took 111 days on average to deport an ex-FNO in Q4 2013, up from 99 days in the previous quarter.
- There were 305 failed removal attempts in Q4 2013, up from 265 in the previous quarter.
- 44% of removals were carried out during the Early Release Scheme period in Q4 2013. 29% of removals were carried out under the Facilitated Returns Scheme in Q4 2013.

⁷ HASC, Work of the Immigration Directorates, [July 2014](#), p21.

⁸ HASC, Work of the Immigration Directorates, [July 2014](#), p21.

⁹ HASC, Work of the Immigration Directorates, [July 2014](#), p21.

¹⁰ HASC, Work of the Immigration Directorates, [July 2014](#), p26.

¹¹ HASC, Work of the Immigration Directorates, [July 2014](#), p34.

Government guidance states that detention should be used only as a last resort, and as a short-term solution whilst someone's identity is clarified or whilst preparing their imminent removal. However, inefficiencies and delays in the immigration and asylum system leave asylum seekers waiting far too long.

When giving evidence to the Home Affairs Select Committee Asylum Inquiry, John Vine, HM Chief Inspector of Borders and Immigration, spoke of discovering nine cases which had taken 323 days to get an initial decision, and referred to another where the applicant had been waiting fourteen years for a final decision.¹²

Such a slow decision making process is partly caused by the necessary allocation of staff and resources to clearing the 'Legacy Backlog'. In July 2006, the then Home Secretary published a report which disclosed there were around 500,000 unresolved asylum cases.¹³ The deadline for those cases to have been resolved was the summer of 2011 but at the end of March 2013, 32,600 remained.¹⁴

In 2009, as part of an investigation into the asylum process, John Vine uncovered a further backlog of 30,000 asylum cases which had been submitted after the introduction of the New Asylum Model in 2007.¹⁵

Expert witnesses were clear that given the dramatic fall in asylum applications to the UK, the only explanation for these backlogs is poor decision making in the asylum process.

This is clearly wholly unacceptable and for obvious reasons puts unnecessary pressure on the detention estate.

The solution, however, is emphatically not to perpetuate this problem by simply expanding the detention estate to allow for more failure within the Immigration Directorate but rather to insist on faster, higher quality decision making from immigration officials. This will reduce the total number of detainees and reduce the length of detention of those detainees. And that, in turn, will save the taxpayer money.

TRAFFIC

I have consistently said that all new development must take into consideration traffic implications and must be supported by strong local infrastructure. It is a well-known that traffic from Oxford to Banbury often bypasses the centre of Kidlington using the A44, A4095 and A4260.

¹² HASC, Seventh Report, Asylum, [October 2013](#), p10.

¹³ The Independent Chief Inspector of Borders and Immigration, [An inspection of the UK Border Agency's handling of legacy asylum and migration cases](#), November 2012, p16

¹⁴ Home Affairs Committee, The work of the UK Border Agency (Jan-March 2013), HC 616, Letter from Sarah Rapson and Dave Wood to the Chair, 10 July 2013.

¹⁵ HASC, Seventh Report, Asylum, [October 2013](#), p11. ¹⁶ [Kidlington Area Strategy](#) para 23.24.

The Kidlington Area Strategy published by Oxfordshire County Council (OCC) is clear that all major junctions along the A4260 regularly suffer from delays during peak traffic times¹⁶. In addition, accidents tend to be concentrated on the busier roads such as the A4360 Kidlington roundabout and the A44/ Langford Lane junction.

Kidlington Parish Council have also voiced their concern that congestion on the A4260 has already reached saturation level, and will be aggravated by a number of current and planned developments such as the new Oxford Parkway station at Water Eaton, the Northern Gateway, the proposed Langford Lane employment development and a possible new development in Woodstock.

I am therefore disappointed that the submitted Planning Statement states that *'the increase in traffic numbers on the A44 and the A4260 will not be significant due to the existing traffic flows on these strategic highways'*. The Transport Statement submitted shows that the plans will create a 70% increase in daily vehicle movements, and with the roads already heavily congested even a small increase, particularly during construction phase, will undoubtedly have an adverse impact on congestion.

I also wish to express my support for the recommendations made by Oxfordshire County Council.

Namely that a Travel Plan be produced to support the application. At present, only a Draft Framework Travel Plan has been submitted however OCC have been clear that a full Travel Plan will need to be drawn up to measure travel behaviour for a five year period, funded through a Section 106 contribution. I understand that prior to the plans being submitted, Home Office officials received pre-application advice from OCC in which it was stressed that a significant amount of transportation related material would have to be submitted with the application.

However, the County Council is concerned that *'much of the material submitted with this application is either inadequate or missing'*. For example, OCC had required the submission of a Transport Assessment (TA) and a Construction Traffic Management Plan (CTMP) however the Transport Statement submitted instead of a Transport Assessment is regarded as insufficient by OCC, as is the submitted CTMP.

The TA should assess additional peak hour trip generation for AM and PM peaks, assess the traffic impact on key junctions based on observed movement through them, demonstrate adequate car and cycling provision based on a quantification of existing and projected usage, and demonstrate the adequacy of transport provisions with scaled drawing and swept path analysis, as outlined by OCC. Similarly, the CTMP is also not fit for purpose as it requires quantification of daily construction vehicle movements and types for each identified construction phase.

I am sure Cherwell District Council will appreciate the importance of a proper traffic management system, given its responsibility to plan effectively for the future when

considering development applications. I would urge Cherwell District Council to ensure that each document as requested is made available as matter of urgency, before the application is approved.

DRAINAGE

Having liaised with Thames Water about this application I understand there are some outstanding issues with regard to sewage and drainage waste. Thames Water are concerned that the development may lead to sewage flooding, and that the calculated net peak flow from the proposed development will consume too much of the receiving sewage network's maximum flow capacity.

I wish to stress Thames Water's recommendations that 'Development shall not commence until a drainage strategy detailing any on and/ or off site drainage works, has been submitted to and approved by, the local planning authority in consultation with the sewerage undertaker. No discharge of foul or surface water from the site shall be accepted into the public system until the drainage works referred to in the strategy have been completed'.

Thames Water should be consulted as this moves forward in order to avoid sewage flooding which clearly would negatively impact on the local community. Kidlington has experienced severe problems with foul water flooding over the past few years and no development that risks exacerbating these problems should even be contemplated.

Again, an impact study is necessary to ascertain whether the proposed development will overload existing infrastructure and this should be done prior to full consideration of the application.

ENVIRONMENTAL FACTORS AND ECOLOGY

Noise and disturbances

When speaking with local residents about the impact of the expansion on the neighbouring area, it has become apparent that a large number are concerned about noise pollution and other issues which could be disruptive. There have been numerous disturbances at Campsfield House over the last decade which residents have had to endure. For example, the disturbance caused by a riot in March 2007 and a fire in August 2007, which led to 26 detainees escaping. Many local residents in this area are elderly, and I am concerned that not enough assurance has been given to them with regard to the proper control and management of a detention centre of the proposed size and scale.

Of course, during construction phase residents will also have to put up with a large volume of traffic and noise as the building work takes place. Over recent years, some residents have

voiced their concern that the existing detention centre has an adverse impact on house prices in the area, these concerns are now heightened as the Home Office look to expand on this land to make a 580 bed estate.

Visual impact

My constituents have also discussed with me the obtrusive lighting at Campsfield House, which will inevitably be increased with the expansion. While at present the centre has very little visual impact on the surrounding area, the Home Office's proposals at present show a two and three storey building which residents are concerned will have very significant visual impacts from the immediate area and also from major roads and footpaths.

EXISTING ISSUES AT CAMPSFIELD HOUSE

I am strongly of the belief that existing issues at the centre must be addressed before the site is deemed fit for expansion.

There have been a series of incidents at Campsfield House over recent years; disturbances involving detainees which have required assistance from the emergency services, numerous hunger strikes, a detainee committing suicide, several incidences of self-harm and most recently a very serious fire which resulted in the evacuation of over 100 detainees in October 2013. Not only does this pose a risk to the welfare of detainees, it often unsettles local residents who are rightly concerned about security and raises questions about the centre's ability to cope with existing numbers.

There has not been a HMIP inspection of Campsfield House since 2011, in which the Inspectorate detailed concerns that recommendations from the 2009 Inspection had not been achieved.¹⁶ I note that these were largely related to Healthcare provisions within the centre.

Healthcare

Healthcare provision at Campsfield is currently carried out by a sub-contractor, The Practice Services Limited, but will be taken over by the NHS shortly. While the most recent Care Quality Commission (CQC) report has found that health provisions within the centre meet expected standards, Medical Justice, a small medical NGO researching healthcare within IRCs, has voiced its concern that the methodology used in these inspections is 'superficial' and does not paint an accurate picture. This is mirrored in the submission made to the ongoing inquiry into the use of Immigration Detention (APPG on Refugees and APPG on Migration) by Asylum Welcome, a welfare group working with Campsfield detainees, who

¹⁶ HMIP [report](#) 2011.

have been clear that there are issues with the quality of healthcare provided.¹⁷ They cite this as one of the greatest concerns expressed by detainees and visitors, as there are lengthy waiting lists for assessment, insufficient access to mental health provision, and not being given medication on time.

Access to legal representative

A further issue raised by Asylum Welcome is the impractical system within the centre for providing detainees with access to a lawyer. I understand detainees are frequently waiting approximately two to three weeks to be able to see a lawyer. As the average length of stay in the centre is 28 days this means that often detainees do not see their lawyer before their removal date. Inevitably, this causes delays and inefficiencies in the immigration and asylum decision making process; unnecessary delays which cause detainees to remain longer in the detention estate. At Campsfield House, there is a rota system for contact with a legal representative, and with the doubling in size of the centre I cannot see how this will be resolved.

I am deeply concerned that with these struggles in management and deliverability of essential services already very much present, they will only be exacerbated by the expansion.

DESIGN AND FACILITIES

Living accommodation

I have a number of serious concerns about the design of the proposals. Having met with representatives of the Independent Monitoring Board (IMB), who have explained in great detail their concerns about the layout, living arrangements and their implications for the day-to-day running of the centre, I also remain concerned about how the designs fit with the Detention Centre Rules¹⁹ which make provision for the regulation and management of detention centres.

Rule 3 (1) *The purpose of detention centres shall be to provide for the **secure but humane** accommodation of detained persons in a relaxed regime with as much freedom of movement and association as possible, consistent with maintaining a safe and secure environment, and to encourage and assist detained persons to make the most productive use of their time, whilst respecting in particular their dignity and the right to individual expression.*

(2) Due recognition will be given at detention centres to the need for awareness of the particular anxieties to which detained persons may be subject

¹⁷ Asylum Welcome, Inquiry into the Use of Immigration Detention, October 2014, para 3.1.11. ¹⁹ [Detention Centre Rules](#), 2001.

and the sensitivity that this will require, especially when handling issues of cultural diversity.

Rule 15 (2) *No room shall be used as sleeping accommodation for a detained person unless the Secretary of State has certified that:*

- a) Its size, lighting, heating, ventilation and fittings are adequate for health;*
- b) It has adequate storage facilities consistent with the interests of security and safety;*
- c) It allows the detained person to communicate at any time with an officer.*

The primary concern is that all living accommodation in the proposed expansion is designed for two person occupancy with a toilet in the room. These facilities will not be behind a solid door but behind a screen or a curtain.

This raises a number of issues with regard to dignity and privacy, not least because detainees occupying the rooms may be from very different cultural backgrounds. At Harmondsworth IRC in Middlesex, a new-build block consisted of cells with bunk beds and toilets in the room which were separated only by a plastic curtain which was not even full-length. Conversely, rooms at Campsfield House at present do not include toilets, and detainees can access both showers and toilet facilities at all times of day and night maintaining their dignity and respect.

Harmondsworth IRC underwent a similar expansion in 2010, in which capacity was increased to hold 600 detainees- doubling it in size. I have liaised with a member of the IMB at Harmondsworth who was on the Board at the time of expansion and remains a member now. It has become apparent at Harmondsworth that having toilets in the rooms meant they could be 'locked down' at night, enabling the contractor to reduce the number of staff on duty overnight. However it has substantially affected the way in which the centre is run, creating a prison style 'lock down' which has been described as 'undignified' and which the IMB believe is in contravention of the Detention Rules. Until very recently, detainees at Colnbrook IRC, neighbouring Harmondsworth, were locked in their rooms at lunchtimes.

Ultimately, the inclusion of a toilet within living space infers a form of prison-like 'lock down' consistent with Category B prison specifications. I agree with the position taken by the IMB at Campsfield that this would be contrary to Rule 15(2)(c) unless every room has a call bell system.

The IMB are also concerned that the inclusion of toilets in rooms as small as 8.9 m² and could result in unpleasant smells and lack of hygiene, which could be contrary to the requirement for health (Rule 15 2a).

Managerial issues

A key concern for me throughout the various meetings with IMB representatives, residents and Home Office and MITIE officials, has been that there will be no free-flow movement for detainees between the existing building and the new extension.

With some facilities intended to be duplicated in the new extension and others shared, and the complex remaining under single management, I am concerned this will lead to limited or timed access to certain facilities.

Amongst the services to be shared by detainees will be healthcare, reception, discharge, Detainee Visits, and Legal Visits. Duplicated facilities include faith requirements, education, internet access, shop, fitness suite and barbers but the IMB are concerned that it has not been made clear whether these will be manned by a new set of staff and have argued that unrestricted free flow of both staff and detainees will therefore be necessary.

Of particular concern to me, is that the legal corridor will be shared. As outlined above, every detainee requires access to legal representation and access to a legal representative is already limited. If legal provision is not expanded to match the scale of expansion planned in this application, the proposals will be self defeating as more detainees get held up in the system without access to adequate legal advice.

How MITIE intend to manage the new extension is not entirely clear. However it does appear that, of necessity, existing building will operate a much more relaxed regime when compared to the new build. I wish to stress the concern raised by the IMB that the lack of free flow, along with the likelihood of 'prison-style lock down' implied by the in-room toilet design, will result in a 'two tier' complex. Clearly, the possibility of disturbances at the centre already exists and I must echo the IMB in their concern that this two tier regime will create managerial difficulties and could result in major disturbances.

As mentioned above, Harmondsworth IRC underwent a similar expansion in 2010, in which capacity was increased to hold 600 detainees- doubling it in size. The HMIP report at Harmondsworth in 2011 found that *'mental health needs were under identified and the inpatients department was described by staff themselves as a forgotten world'*.¹⁸

Given the existing issues with access to mental health provisions at Campsfield House, serious consideration should be given to the potential consequences of this design for a 'two-tier complex'.

Following the expansion of Harmondsworth, HMIP reported that *'the new accommodation had been built to prison specifications, which was out of keeping with how a detainee*

¹⁸ HMIP, Harmondsworth IRC, 2011 paragraph 5.72.

population should be managed (...) the prison-like design of the new units is regrettable and such an environment will always be unsuitable for people held under immigration powers'.¹⁹ I feel strongly that we must ensure the same mistakes are not made at Campsfield House.

Care and Separation Unit

Proposals include plans for a Care and Separation Unit, most commonly seen within the prison estate rather than within an Immigration Removal Centre. Presently at Campsfield House there is a purpose-built Removal from Association Unit for detainees placed in temporary confinement, however at time of development the IMB voiced their concern that it did not contain showers. Showers have since been built in to the Unit, and other retrospective changes have had to be made, however there are outstanding issues. For example, the Unit is seen to be of poor design as it becomes very hot in summer and cold in winter and ventilation is poor. The IMB has been clear that it is *'barely suitable for temporary confinement'* and is *'completely unsuitable for use by detainees removed from association'*. Therefore, further detail is necessary to determine how the Care and Separation Unit will be built to an acceptable standard and previous mistakes will not be repeated.

Mosque

A mosque has been included in the plans however the IMB are concerned that it will be inadequate, particularly for Friday prayers and during Ramadan. In the existing centre, in addition to the Mosque, it can be necessary to bring other areas into use for prayer. The HMIP Inspection Report in 2009 stated that the mosque was not large enough to accommodate those who wished to attend Friday prayers, therefore HMIP recommended that detainees should be able to attend corporate worship in a mosque of adequate size. This was not remedied and the recommendation was repeated in the 2011 Report.²⁰

It is worth noting that over 50% of detainees at Campsfield House are Muslim and so this should remain an important consideration in drawing up proposals.

Sports Hall

While there are provisions for a gymnasium within the proposals, I note that a sports hall has been omitted from the new building. The IMB have discussed with me their concerns that the existing 'allweather pitch' is inadequate, and outside areas cannot be used in adverse weather conditions or in hours of darkness for sports such as badminton, table tennis and circuit training.

Further, the design of the complex, as detailed above, will not permit free flow of detainees. Therefore, detainees in the new building would be limited as to when they are able to access

¹⁹ HMIP, Harmondsworth IRC, 2011.

²⁰ HMIP Report, 2011, paragraph 2.55.

the sports hall. Again, this adds to the sense that the building will be run as two separate units, with detainees able to access certain facilities only at certain times and, in some cases, subject to their behaviour.

CONCLUSION

Detention is a necessary part of our immigration system. However, it is vital that detention centres are sensitively designed and are appropriate to their location. This planning application is neither.

The area proposed for development is on Greenbelt land and the Home Office have failed to make their case of 'overriding need'; failed to demonstrate that they have genuinely considered all other possible locations and misrepresented Cherwell Local Plan *Policy Kidlington 1: Langford Lane Technology Park*.

The Home Office claim increasing the capacity of the Detention Estate to 5000 is necessary. However, answers to Parliamentary Questions demonstrate that, not only has capacity increased significantly in recent years but also, that taking into account the Prison Service Level Agreement, there is already detention capacity of near 5000.

There is clear evidence that the Home Office has ample room for improvement in speeding up their decision making and, where appropriate, deportation process within the immigration and asylum system. Achieving this would save the taxpayer money, reduce the number of detainees waiting in limbo for a decision one way or the other, and remove the need for expanding the detention estate.

Finally, they claim that expanding an Immigration Detention Centre on the Greenbelt in Kidlington is in line with Cherwell Local Plan *Policy Kidlington 1: Langford Lane Technology Park*. This is a complete misrepresentation. In fact, the Local Plan only allows for small local Green Belt review solely to allocate land for '*higher value employment uses such as high technology industries in the research and development sector*'. It is impossible to describe a Detention Centre as a '*high technology industry in the research and development sector*.'

In addition to Greenbelt concerns, the IMB and local residents have serious and unresolved concerns about the design and management of the expanded Centre itself. In particular, the inclusion of toilets in the 8.9m rooms implying 'prison-style lock down,' the lack of free flow between the two centres and the two-tier system that will arise from lack of shared services and the inevitability of different managerial regimes between the existing building and the new complex.

Campsfield House was first opened over twenty years ago as a small, 200-bed centre. It has expanded piecemeal since then and the IMB can recount many difficulties that have arisen due to poor planning in the development of Campsfield in the past. The Home Office proposal for Campsfield House would double its size, making it one of the largest detention centres in Europe. Given the cautionary tale of Harmondsworth IRC, which had a very similar expansion in 2010, and the clear warnings being given now by the IMB, it would be negligent

not to act on those concerns now and prevent serious consequences for detainees and local residents.

I urge the Planning Committee to listen to local concerns and reject this planning application outright.



N Blackwood

Member of Parliament for Oxford West & Abingdon