CROWN/2026/0000005

HASLAR IRC

APPLICANT'S STATEMENT OF CASE

Introduction

1. This is the Applicant's Statement of Case made under rule 13(3) of the Town and Country Planning (Crown Development Applications) (Hearings and Inquiries) Rules 2025.

2. The Applicant seeks outline planning permission for the expansion of the Haslar Immigration Removal Centre ("IRC"), Gosport, Hampshire ("the Site"). All matters are reserved, save for access.

3. The Inspector has directed that this Statement of Case is filed on the same date as the Applicant's Proofs of Evidence. It is therefore prepared as a summary of the Applicant's case, and reference should be made to the Proofs of Evidence which are not repeated here.

The application

4. The Site comprises an existing IRC, which closed in 2015 and is being refurbished to be brought back into use in 2027. The site was previously used as a Youth Offenders' Centre, and historically as military barracks. The operational capacity of the existing IRC, following refurbishment, will be for 130 detained individuals. The application seeks permission for the expansion of the IRC through providing additional accommodation blocks, ancillary support facilities, replacement and upgraded infrastructure, additional parking, landscaping, and associated operational works. Once completed, the capacity of the IRC will be up to 600 detained individuals.

5. The application was accompanied by a suite of application documents which will be referred to as necessary during the inquiry.

Summary of the Applicant's case

6. Immigration detention is an administrative measure used to support the functioning of the UK's immigration system. Detention under immigration powers

is used initially to establish a person's identity or basis of claim; and/or where there is reason to believe that the person will fail to comply with any conditions attached to a grant of immigration bail; and/or ultimately, to effect removal.

7. The purpose of IRCs is to provide secure accommodation for individuals detained under immigration powers. The current headline capacity of the immigration detention estate is 2,600 detained individuals, but in practice the operational capacity is less than this. It is Government policy to increase the capacity of the detention estate by 1,000 male detention bed spaces. This reflects capacity assessments carried out by the Home Office.

8. The reopening and expansion of Haslar has been chosen as one means of achieving increased capacity. Having considered a range of options, the Home Office concluded that increasing capacity at this IRC was appropriate. It is an existing IRC, in an appropriate location, with physical space within the secure perimeter of the Site to deliver additional capacity.

9. In planning terms, it is an appropriate location for this form of development. There is an established IRC use and a long history of institutional secure accommodation at the Site. The Site lies predominantly within the urban area of Gosport and is therefore in principle an appropriate location for new development. Whilst there will be impacts from the proposals, those adverse effects do not come close to substantially outweighing the benefits of the proposals in terms of meeting the pressing national need for increased immigration detention capacity.

10. The application has sought to address various planning matters, and concerns raised by the local planning authority and others have been addressed in the Applicant's evidence for the Inquiry. There are no good planning reasons to refuse permission. It is clear that the adverse effects do not substantially outweigh the benefits of the proposal. Accordingly, the Applicant will submit that the proposals are in accordance with the development plan, and other material considerations strongly indicate that permission should be granted.

<u>Inspector's main issues</u>

11. The main issues have been identified by the Inspector can be summarised as follows:

    a. Matter 1 – The principle of development (need for increasing capacity at Haslar IRC);
    b. Matter 2a – Heritage and Conservation;

c. Matter 2b - Character and appearance;
d. Matter 3 - Amenity – lighting, privacy, noise, traffic and construction;
e. Matter 4 - Highways and access;
f. Matter 5 - Flood Risk and Drainage;
g. Matter 6 – Ecology.

12. Each matter is addressed in below. A further issue has been identified by the Inspector as to the adequacy of the supporting information

Matter 1 – principle of development

13. The need for the development is explained in the Planning Statement and further in the Proof of Evidence of [redacted]. The requirement for additional detention capacity has been endorsed through successive ministerial, financial and departmental governance processes. The need to expand detention capacity has been accepted both by the Home Office and the Treasury. The expansion has been funded through money allocated in the Spending Review in 2025. In short, there is an established need for an additional 1,000 detention beds, and the funding in place to deliver it.

14. The identification of Haslar IRC as one location to be used to address this need is explained in the Planning Statement, [redacted] evidence, and the Proof of Evidence of [redacted]. The site selection process prioritised the re-opening and/or expansion of existing IRCs, since such sites were already within the Home Office's control and would benefit from existing site infrastructure. In planning terms, such expansions would not involve the introduction of new uses, but rather expand on existing uses, making best use of the existing detention estate and, in this case, bringing an underused previously developed site back into use. In relation to the development plan, Policy LP3 of the Gosport Local Plan supports development within the defined urban area, and the majority of the Site aside from the car park area lies within this defined boundary.

15. A concern has been raised in relation to the impact of the proposals on the regeneration proposed on the Haslar Peninsula, and in particular the Haslar Hospital site. The IRC is not itself part of those regeneration proposals, and there is no evidence that the detention use at the Site will adversely affect those proposals. The planning policy support, and the relevant planning application for redevelopment of the Hospital site, came forward in the context of the established detention use at the Site. Accordingly, the wider regeneration objectives on the Haslar Peninsula would not be undermined by the proposed IRC expansion.

Matter 2a – Heritage and Conservation

16. The Haslar Peninsula has a long history of military use, recognised in a number of heritage designations. The specific concern which has been raised relates to the impacts of the proposals on the setting of the Haslar Barracks Conservation Area, which adjoins the application site. The Applicant's analysis in the Heritage Impact Assessment, as further explained in the Proof of Evidence of Naomi Brennan, demonstrates the application proposals would not affect the significance of the Conservation Area by reason of being within its setting. That is because the significance of the Conservation Area is not principally derived from its setting. The proposals therefore would preserve the significance of the designated heritage asset.

17. Even if the local planning authority is correct to allege some harm to the Conservation Area, it is not substantial harm, and therefore falls to be weighed against the benefits of the proposals. The benefits, in terms of meeting a pressing national need for increased detention capacity, are substantial and would outweigh any harm to the significance of the Conservation Area by virtue of development within its setting. Accordingly, the proposals accord with national and local policies which seek to preserve heritage assets.

Matter 2b – Character and Appearance

18. The application is in outline and therefore the design, layout and appearance of the buildings is not being determined. However, it is accepted that development within the parameters proposed would result in localised adverse effects on the character and appearance of the area. However, such impacts need to be viewed in the proper context. The Applicant's evidence will demonstrate that the development can be accommodated within the wider landscape character and visual amenity of the area and is generally acceptable in terms of landscape and visual impact. Opportunities for mitigation can be secured and detailed at reserved matters stage. The development will be viewed in the context of existing institutional uses and within the existing secure perimeter of the long-established detention use.

Matter 3 – Amenity

19. Since the proposals would involve development within the existing fenceline of the long-established secure facility at the Site, there is no new use being introduced to the vicinity. Rather, the proposals will result in an intensification of an existing lawful use. The application documents, and the Applicant's evidence to the Inquiry, explains how impacts in relation to lighting, privacy, noise, traffic and construction can be appropriately addressed through detailed design and

planning conditions. Through these mechanisms the intensified use at the Site can be implemented without material effects on the amenity of neighbouring uses.

Matter 4 – Highways and Access

20. The application is supported by a Transport Assessment which demonstrates that that the proposed access arrangements are acceptable, the local highway network has sufficient capacity for the additional demand, adequate parking can be provided on-site, and the emergency access arrangements are satisfactory. Neither the local planning authority nor highway authority has identified any highways reason for resisting the development. The proposals would use existing and improved access arrangements, together with delivering new parking provision. Measures are proposed to encourage sustainable modes of transport including a Staff Travel Plan, cycle provision, minibus service for visitors, and contributions to active travel measures. Accordingly, the proposals accord with local and national policy in relation to highways and transportation matters.

Matter 5 – Flood Risk and Drainage

21. Detailed consideration has been given during the application process and in ongoing engagement with the Environment Agency and lead local flood authority to flood risk matters. The Site is at risk from coastal flooding, due to its proximity to the sea wall. Since it the proposal is for the expansion of the existing IRC, the Sequential Test is passed. Flood risks have been addressed through the application of the Exception Test, to the satisfaction of the statutory flood authorities. This has included the development of a Flood Evacuation Management Plan and a commitment to set the finished floor levels of the accommodation blocks above the design flood level, together with a freeboard allowance. Accordingly, the Environment Agency is satisfied that the risks from coastal flooding have been adequately addressed. Applying the Exception Test, the proposed development would be safe for its lifetime without increasing flood risk elsewhere.

22. It follows that the proposals accord with local and national planning policy in respect of flood risk.

Matter 6 - Ecology

23. Extensive consideration has been given to the ecological impacts of the proposed development. Parts of the Site are used as grazing land by birds including Brent Geese, which are an interest feature of nearby designated sites. Arable land which provides suitably alternative grazing land has been identified as part of the

development of these proposals, and its long term management for Brent Geese has been secured. The effects of increased nutrient loads from wasterwater treatment as a result of the development have been addressed through securing nutrient credits. Accordingly, Natural England is satisfied that there would be no adverse effect on the integrity of the designated sites, and the Appointed Person will be invited to draw the same conclusion in undertaking a Habitats Regulations Assessment.

24. In relation to other ecological receptors, and in particular bats and reptiles, there is a concern raised about the adequacy of information at this stage. However, there is sufficient information to conclude that any impacts on these species can be appropriately mitigated, and detailed design will be informed by further survey work which can also be secured by planning conditions.

25. Although not directly related to ecology, an issue has been raised about access to the coastal environment and in particular the impact on the King Charles III England Coast Path. The proposal will deliver a realignment and enhancement of the Coast Path as it passes through the site, ensuring that access to the coast is maintained and that improvements are delivered to the path.

Available information

26. The application documents provide an appropriate level of detail for an outline application. Although some material has been presented in a redacted form in light of the direction made s 293H Town and Country Planning Act 1990 (the Security Direction), the information available in the public domain is sufficient to address the matters relevant to the grant of outline planning permission. The Applicant has engaged directly with statutory consultees to provide further information where that has been considered necessary and appropriate.

27. It is not expected to be necessary to refer to information which is the subject of the Security Direction at the Inquiry. For completeness, however, the Home Office has sought a further direction in respect of the Inquiry to ensure that if information which is the subject of the existing direction does need to be considered, appropriate arrangements can be put in place.

Conclusions

28. The proposals will meet an established national need for increased immigration detention spaces, in an appropriate location for the use and within an existing and long-established IRC. The Site lies predominantly within the urban area of Gosport, where new development is considered appropriate in principle as a matter of local and national policy. Whilst there are some adverse effects from the

proposals, these are localised and do not present any clear reason for refusing outline planning permission. Applying the relevant tests in policies S3 and S4 of the National Planning Policy Framework, the residual adverse effects of the development do not come close to substantially outweighing the substantial benefits of provision of immigration detention spaces to meet a national need.

29. For those reasons, planning permission should be granted in the terms sought.