



ENGAGEMENT REPORT

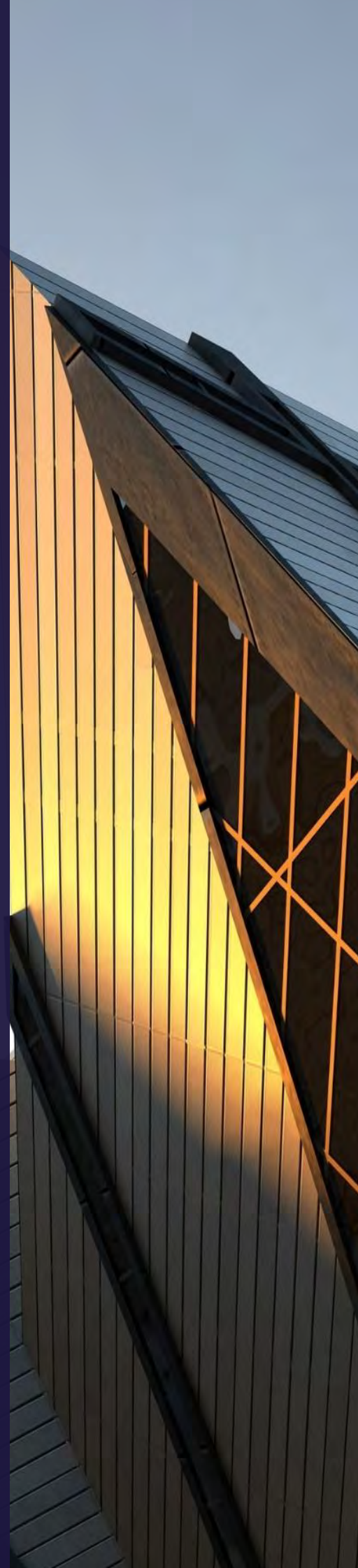
**Haslar Immigration Removal Centre
Home Office**

Official Sensitive

DEVELOPMENT & PLANNING | BIRMINGHAM

May 2026

Better never settles



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Version	Prepared By	Approved By	Date
Engagement Report	UC MRTPI	MJ MRTPI	18 May 2026

Contents

1.	Introduction	4
2.	Background.....	6
3.	Engagement on Proposals.....	7
4.	Outcome of Engagement	10
5.	Conclusion and Next Steps.....	19

Appendix A	-	Information provided at the public engagement event.
Appendix B	-	Haslar IRC Factsheet
Appendix C	-	Natural England
Appendix D	-	Historic England
Appendix E	-	Environment Agency
Appendix F	-	Crown Premises Fire Safety Inspectorate
Appendix G	-	Hampshire County Council LLFA & HCC
Appendix H	-	NHS England
Appendix I	-	Gosport Borough Council – Pre-Application
Appendix J	-	Gosport Borough Council – Emergency Planning Team
Appendix K	-	UK Health and Security Agency
Appendix L	-	Hampshire Police
Appendix M	-	Crown Estates Commissioners
Appendix N	-	Department for Science, Innovation and Technology
Appendix O	-	Health & Safety Executive (HSE)
Appendix P	-	Department for Energy Security and Net Zero

1. Introduction

- 1.1 This Engagement Report has been prepared by Cushman & Wakefield (C&W) on behalf of the Home Office (HO) in support of an Outline Planning Application for the expansion of Haslar Immigration Removal Centre (hereafter the Proposed Development) at the Haslar IRC, Dolphin Way, Gosport, PO12 2AW (hereafter referred to as the Site).
- 1.2 The report summarises the engagement that has taken place with stakeholders and how the engagement has contributed to the development of the proposals. The HO has undertaken engagement with key stakeholders who have an interest in the site and its existing and future purpose. This report summarises the engagement which has taken place since May 2025, although the HO proposes to maintain engagement with key stakeholders and will continue to do so post submission of the planning application and during the lifetime of the development.
- The HO also conducted engagement in advance of commencing refurbishment works associated with the re-opening of the former Haslar IRC, which included a public engagement event in January 2023. Re-opening of the former Haslar IRC is expected in 2027, and this Engagement Report specifically focuses on the engagement conducted by the HO in relation to the proposed expansion of the IRC.
- 1.3 This Engagement Report summarises:
- Engagement that took place in relation to the plans to expand Haslar IRC from May 2025 including [but not limited to] MP Dame Caroline Dinenage, Gosport Borough Council (GBC), Hampshire County Council (HCC).
 - Ongoing engagement with local statutory stakeholders (August 2025 - ongoing)
 - Engagement on the proposal; and
 - Key issues and themes identified from the engagement activity and the outcomes of the engagement on the proposal.
- 1.4 Accordingly, this report is structured as follows:
- Section 2 provides context for the engagement and background of the project.
 - Section 3 of this report sets out engagement on the Crown Development proposals.
 - Section 4 of this report summarises the outcomes of consultation with stakeholder groups, including technical stakeholders.
 - Section 5 of this report summarises the conclusions of the engagement exercise and outlines the next steps of engagement post submission.
 - Appendix A of this report contains information provided at the public engagement event.
 - Appendix B of this report is the Haslar IRC Factsheet.
- 1.5 The following appendices contain copies of other stakeholder engagement responses:
- Appendix C - Natural England
 - Appendix D – Historic England
 - Appendix E – Environmental Agency
 - Appendix F – Crown Premises Fire Safety Inspectorate
 - Appendix G – Hampshire County Council (LLFA &HCC)

- Appendix H – NHS England
- Appendix I – Gosport Borough Council Pre-Application
- Appendix J – Gosport Borough Council – Emergency Planning Team
- Appendix K – UK Health and Security Agency
- Appendix L - Hampshire Police
- Appendix M – Crown Estates Commissioners
- Appendix N - Department for Science, Innovation and Technology
- Appendix O - Health & Safety Executive (HSE)
- Appendix P - Department for Energy Security and Net Zero

2. Background

- 2.1 In 2022, the Home Office announced the reopening of Haslar Immigration Removal Centre. The IRC closed in 2015 reflecting efforts at the time to reduce the size and use of the immigration detention estate.
- 2.2 The Home Office is redeveloping the former Haslar Immigration Removal Centre in Gosport in two phases: refurbishing existing buildings for reopening in 2027 and constructing new accommodation to expand the facility.
- 2.3 The updated facility will offer modern, secure housing for detained men, with 130 beds initially and expansion to 600.
- 2.4 It is proposed to seek outline planning permission via the non-urgent Crown Development Route (CDR) due to the national importance of the proposals. These proposals are critical to matters of national and border security; hence it is appropriate to seek consent via this route.

3. Engagement on Proposals

3.1 The description of the development itemised below provides details of the proposed scheme, which is included in the Planning Statement and was used as a basis for technical assessment.

“Outline Planning Application with all matters reserved (except for access) for the extension of the Haslar Immigration Removal Centre comprising the erection of Accommodation Blocks and ancillary supporting accommodation, the conversion and expansion of existing site infrastructure, demolition of existing structures, creation of additional car parking, landscaping and associated site infrastructure. “

Community Engagement Plans

3.2 There is no legal requirement to run a formal consultation as part of the Crown Development process. However, community engagement with a broad range of impacted and/or interested stakeholders is encouraged within the procedural guidance published by the Planning Inspectorate (PINS).

3.3 The objective of the engagement process was to share information relating to the outline planning application with local residents and property/business owners, elected representatives, local authorities and other bodies and technical engagement partners. This would provide an opportunity for key stakeholders to review the proposals and make comments, in turn, enabling the feedback to influence the planning proposals, where appropriate.

3.4 Following feedback from local partners, the decision was made to target the community engagement at those living close to the site and most likely to be affected by the development, with the aim of securing feedback specifically on the planning proposals. Working with the programme’s project team, a catchment area surrounding the Haslar IRC site was drawn up with a view to inviting feedback from everyone who lived or owned a property or business within this area.

3.5 In addition, letters were sent to MP Dame Caroline Dinéage, Gosport Borough Councillors, Parish Councillors, and technical organisations to provide details about the engagement event and how they could attend.

3.6 The event was attended by Home Office and NHS England officials to enable stakeholders to raise any concerns regarding plans. All concerns were recorded and are set out in section four of this report. Some of the key dates associated with the engagement process are listed below for reference.

Community engagement timeline	Activity
2 nd September 2025	Letters sent, via email, to: <ul style="list-style-type: none"> • MP Dame Caroline Dinéage • Gosport Borough Councillors • Police
2 nd September 2025	Letters posted to properties within the catchment area.
09 th October 2025	Meeting with MP Dame Caroline Dinéage
10 th October 2025	Haslar IRC Public Engagement Event

Table 1 – Key engagement

Engagement Feedback

- 3.7 The engagement event was held on 10th October 2025, at Gosport Community Association & Thorngate Halls. The venue is 1.7 miles away from Haslar IRC. The event was held in a format usual for planning application consultation with information boards set out around the Hall, and Home Office and technical staff being present on a day to answer any questions.
- 3.8 The event was held in three sessions. Firstly, time was allocated for councillors and Council members to view information and speak with the Home Office and wider technical team about any concerns they may have. This was then followed by a session for nearby neighbours, and finally, the session was opened to anyone else interested in the proposal.

Technical Stakeholder Engagement

- 3.9 In August 2025, the HO began a formal engagement process whereby a request for pre-application advice was submitted to MHCLG and GBC. The pre-application submission requested confirmation from both authorities on which stakeholders to engage with during the process of refining and finalising the Outline Planning Application. The HO was advised to engage with the following stakeholders in addition to local residents and politicians (see Community Engagement above):
- a. Natural England
 - b. Historic England
 - c. Environment Agency¹
 - d. Crown Premises Fire Safety Inspectorate
 - e. Hampshire County Council (as lead local flood authority, highways authority)
 - f. NHS England
 - g. Gosport Borough Council
 - h. UK Health and Security Agency
 - i. Hampshire Police
 - j. Crown Estates Commissioner
 - k. Department for Science, Innovation and Technology
 - l. Health and Safety Executive
 - m. Department for Energy, Security and Net Zero
 - n. Any designated neighbourhood forum²

- 3.10 The applicant project team contacted the above stakeholders and explained the proposed development. Where necessary, formal engagement was undertaken through established pre-application protocols. Table 2 below summarises the engagement activity with technical stakeholders.

Table 2 – Technical stakeholders contacted by the HO and Project Team

Technical Stakeholder	Method
Natural England	Through 1 st Horizon as lead ecology specialist
Historic England	E-mail, 12 th January 2025.
Environment Agency	E-mail, 27 th February 2023

²There is not a designated Neighbourhood Forum within close proximity to the application site.

Crown Premises Fire Safety Inspectorate	E-mail, 1 st December 2025
Hampshire County Council LLFA	E-mail and letter, 18 th December 2025
Hampshire County Council Highways	Pre-Application, 11 th February, 2026
Hampshire County Council Emergency Planning Team	E-mail, 12 th December 2025
NHS England	E-mail, 9 th January 2026
Gosport Borough Council - Planning	Letter, 17 th November 2025
Gosport Borough Council – Emergency Planning Team	E-mail, 24 th December 2025
UK Health and Security Agency	E-mail, 13 th November 2025
Hampshire Police	E-mail, 13 th November 2025
Crown Estates Commissioner	E-mail, 13 th November 2025
Department for Science, Innovation and Technology	E-mail, 16 th December 2025
Department for Energy, Security and Net Zero	E-mail, 17 th November 2025

4. Outcome of Engagement

- 4.1 There has been productive engagement with a wide range of impacted stakeholders at national and local levels. This report has set out when this has taken place and through what methods. This section sets out key issues that have been identified, the channel of engagement and how the HO have responded.
- 4.2 In terms of response level, 157 individuals attended the engagement event on 10th October 2025.
- 4.3 In addition to the engagement event, responses from organisations were received by the HO following contact and these are summarised below and contained in full within the appendices to this report.

Key Themes

- 4.4 Following the Home Office and technical team community engagement event, the main themes of concern were identified as: Design and Heritage, Sustainability/Environmental Noise and Construction, Planning Route, Highways and Parking, and Healthcare. Other themes also included contracts, costs and operating service provider, detention and IRC Policy, refurbishments of current IRC, and emergency services provision.

Design & Heritage

Community Feedback

- 4.5 A significant concern among residents and the local MP is the height of the proposed three-storey houseblocks. Many felt the proposed scale is excessive and intrusive compared to the existing IRC refurbishment, which is generally well-received. The increased height raises fears of overlooking into domestic properties, as the buildings would be taller than the perimeter fence, thus allowing IRC residents to see into gardens and homes. Whilst some residents acknowledged the indicative site layout kept buildings away from their properties, the overall sentiment was negative.
- 4.6 Residents raised issues around privacy. Questions focused on whether screening would be provided around the houseblocks and what type of windows would be installed (clear or obscured) and whether this would differ between bedrooms and communal spaces. The height and effectiveness of the perimeter fence were also questioned, with concerns that it would not prevent overlooking. Additionally, the proposed buffer zone and fencing were criticized for blocking sea views from residential properties.

Response

- 4.7 The approach to design is set out within the submitted Design and Access Statement.
- 4.8 The existing fencing around the site is 5.2 meters high and complies with national standards typically used for prisons and Immigration Removal Centres (IRCs). The lower portion of the fence is solid and non-transparent, meaning that ground-level activity within the IRC will not be visible to passers-by the site.
- 4.9 The orientation of the proposed IRC buildings, running parallel to the neighbouring residential properties, means that overlooking is expected to be minimal and can be mitigated with landscaping. Building designs will progress during the later RIBA stages and will be finalised through reserved matters, which will review details of the design, such as window design and glazing.
- 4.10 The accommodation blocks are to be located toward the southeastern part of the site, distant from residential properties. The closest buildings are the ancillary Dining block and Care and Separation Unit (CASU), which are both approximately 7 meters in height (typical of a two-storey

dwelling).The 12 metre, three storey accommodation blocks will be obscured in part by the ancillary buildings, and their impact will be lessened as the topography of the site drops towards the southeast.

4.11 The loss of a sea view is not a material planning consideration.

Stakeholder Feedback

4.12 Pre-Application advice from GBC in relation to design recommends the following design and layout principles:

- The proposals would be acceptable in principle, provided it is in accordance with the other policies of the adopted Local Plan.
- Development adjacent to Haslar Barracks Conservation Area (CA) likely impacts its setting. Design should respond to and reinforce locally distinctive patterns, landscape, and culture, including maritime and military heritage.
- Proposed development: four 3-storey blocks (12m high), two within 20m of single-storey historic barracks—considered overbearing and harmful, substantial public benefits required to outweigh harm.
- Conservation Area Appraisal recommends a landscaped buffer and tree planting to avoid harm.
- Careful consideration will need to be given to the potential visual impacts of land raising, if this is the preferred flood mitigation option, due to the site being adjacent to the Haslar Barracks Conservation Area and the potential impact on the setting of the Conservation Area.
- The new development should also be designed to consider adaptability to climate change and use sustainable construction techniques and materials wherever possible.

4.13 Earlier pre-application advice from Historic England in relation to heritage states:

- Historic England consider the impact on Fort Monckton is likely to be low and our comments on the planting for screening purposes still stand.
- Historic England provided some comments on the design of the new buildings in relation to their location immediately adjacent to the Haslar Barracks Conservation Area. The design does not appear to have changed. We also requested contextual elevations. However, given the potential impact on the Conservation Area is likely to be modest, we would defer to GBC going forward. The Conservation Officer there, should be able to provide further advice on this.

Response

4.14 The approach to design is set out within the submitted Design and Access Statement.

4.15 The impact on heritage and the Conservation Area has been set out in the Heritage Impact Assessment. The assessment has identified that the proposed development will have no direct impacts on any designated heritage assets. This assessment has also found that due to the embedded mitigation measures and the incorporation of Historic England's recommendations, the proposed development will have no impact on the significance of any designated heritage assets, including Haslar Barracks Conservation Area and Fort Monckton Scheduled Monument.

Flood Risk, Sustainability/Environment

Community Feedback

- 4.16 Attendees at the October 2025 public engagement event expressed concerns that the IRC's drainage systems might discharge directly into the sea. However, staff reassured them that this was not the case. Questions were also raised about sea wall effectiveness and whether sea wall surveys had been conducted, with some noting the potential scope of work required to address existing issues.

Stakeholder feedback

- 4.17 Pre-Application advice from GBC in relation to flood risk, sustainability/environment recommends the following:

- The land-use proposed in this location is for a more vulnerable use, and development proposals should not increase flood risk elsewhere. It will be necessary to ensure both the residential accommodation and critical infrastructure such as access and egress to, from and within the site are protected from flooding along with other key infrastructure elements such as drainage, utilities, physical buildings such as the proposed energy centre, and the medical centre.
- Local Plan requires all new developments to ensure there will be no net increase in surface water run-off and new development proposals will need to include SuDS as part of the management of surface water on the site.
- The existing sports field within the site has been identified as a 'Primary Site' in the current Solent Waders and Brent Goose Strategy and therefore suitable mitigation will be required.
- The development proposals will also need to demonstrate how securing a minimum of 10% of biodiversity net gain (BNG) will be achieved.
- The site lies within the Solent Nutrient Neutrality Area and needs to offset any harms.
- Support for local skills and training in both the construction phase of the development and operationally should be considered through S106 contributions.

- 4.18 Hampshire LLFA response in relation to flooding and drainage recommends the following:

- The site is subject to coastal flooding, with the eastern section benefitting from coastal defences. However, there remains a flood risk from the north, which has been modelled and is currently being discussed with the Environment Agency. Although LLFA does not provide comments on coastal matters, it is essential to ensure that surface water drainage systems remain operational during a coastal flood event and that exceedance routes are appropriately managed.
- It was noted that a sequential approach to site layout is generally expected, with dwellings positioned outside areas of flood risk.
- The proposed connection point is understood to be a Southern Water sewer. While this is acceptable in principle, additional details will be required to confirm approval of the connection and the permitted discharge flow rate.

- The response also set out that documents and calculations need to be provided to demonstrate Flood Risk will not be increased elsewhere and appropriate mitigations can be achieved and proposed surface and foul drainage is acceptable.

4.19 GBC Emergency Planning Team responded in relation to the Flood Evacuation Management Plan:

- Consideration should be given as to how you will communicate with individuals for whom English is not their first language.
- Revise actions for Hampshire County Council and Gosport Borough Council as per advice.
- Revised Emergency Contact Numbers

4.20 HSE response in relation to Health & Safety confirms that no further consultation is required with HSE as:

- Haslar Immigration Removal Centres do not lie within any consultation zones for toxic, highly reactive, explosive or flammable hazards, and therefore HSE's Land Use Planning advice team would not need to be consulted on planning applications at this location.
- Operational health and safety matters that fall within the HSE's remit are not assessed by the HSE as part of the planning process; instead, they are addressed separately under health and safety legislation, outside of planning decisions.

4.21 Environment Agency was consulted by 1st Horizon as the applicant's flooding specialist. The response has confirmed that the site might be affected by extreme flooding, ignoring the presence and effect of any flood and defences and there are no records of flooding to proposal area.

4.22 Natural England was consulted by 1st Horizon as the applicant's ecology specialist. The proposed ecology mitigation has been endorsed by Natural England.

4.23 The Crown Premises Fire Safety Inspectorate confirmed that they will review any fire safety specific documents in relation to the proposal once the design progress and when these are available.

Response:

Flood Risk

4.24 A Flood Risk Assessment (FRA) has been undertaken by 1st Horizon. The FRA demonstrates that the proposed development would be operated with minimal risk from flooding and would not increase flood risk elsewhere, subject to mitigations set out in the report.

4.25 A Drainage Proposal has been prepared by 1st Horizon and shows foul discharge into drainage mains. Surface water runoff would be directed to the drainage system through one of the following: a swale located along the lower portion of the eastern boundary; filter drains located in the northwestern extent of the site with precise locations dependent on main water pipe positions; attenuation crates in the northeastern corner of the site; permeable paving in the northern extent of the site.

4.26 A Coastal Modelling report has been prepared by 1st Horizon. The coastal modelling exercise indicates that both baseline and breach scenarios generally impact the site, with significant effects concentrated on the northern section which aligns with the proposed developable areas. The flood depth data provided in this modelling report should be used to inform the design and layout of the proposed development.

4.27 A sea wall survey has been undertaken by AKS Ward. The survey confirms recommended repairs and is included in the Coastal Modelling report (1st Horizon) in Appendix C.

4.28 The Flood Evacuation Management Plan has been prepared by 1st Horizon, which sets out an evacuation plan in case of an emergency.

Ecology/Environment

4.29 BNG, including 10% net gain, is proposed to be secured off site through the purchase of credits. The BNG Report is submitted with this application.

4.30 A BNG assessment has been undertaken and the BNG metric confirms that on site habitat is 29.94 units. The proposal will result in the net loss of -86.21% habitat loss and off-site contribution is proposed.

4.31 The applicant has agreed a mitigation package for the replacement of the Brent Geese Habitat. A mitigation strategy has been agreed that will include the creation of a Stubbington Brent Geese Reserve.

4.32 A Nutrient Neutrality (NN) Assessment has been prepared by 1st Horizon, which sets out how the development impacts on Solent NN will be offset. An Allocation Agreement with Albion Water Limited has been signed for nitrate offsetting and is submitted with this planning application.

Contamination

4.33 A Phase 1 Ground Investigation Desk Study has been prepared by 1st Horizon and is submitted with this planning application.

Sustainability

4.34 Home Office (HO) will aim to achieve BREEAM 'Excellent', which is a requirement by the HO BREEAM Policy.

4.35 The new buildings use sustainable architecture techniques that use the natural environment to reduce energy. This includes air source heat pumps, solar panels to offset energy use, improved insulation, and air tightness.

Noise, Dust and Construction

Community Feedback

4.36 Residents raised concerns about construction parking and noise from the refurbishment works, and concern is likely to continue with the expansion proposals. Additionally, residents expressed concerns over asbestos removal procedures and the potential health risks posed by mud and dust around the site.

Technical Partner Feedback

4.37 Pre-Application advice from GBC in relation to the design recommends the following:

- A noise impact assessment should be provided for this area, including the proposed plant, to evaluate potential noise effects on nearby residents as well as future occupiers of the development.

Response:

4.38 A Noise Impact Assessment has been prepared by 1st Horizon. The assessment confirms that the cumulative plant noise impact from the existing Haslar IRC and the proposed development plant remains acceptable, with no significant adverse effect anticipated at nearby dwellings and no resulting harm to residential amenity.

4.39 The Outline Environmental Management Plan has been prepared by AtkinsRéalis, which ensures that environmental and other such considerations are embedded into project planning and delivery well in advance of construction. The document establishes principles and preliminary measures that will guide the appointed contractor in producing a detailed Construction Environmental Management Plan (CEMP). The CEMP will translate these principles into site-specific procedures and controls, ensuring compliance with all relevant legislation, planning conditions and best practice standards.

4.40 A Waste Strategy Statement was prepared by AtkinsRéalis which confirms that:

- Waste should be stored and managed securely to protect health and the environment while maximising reuse, recycling, and recovery. Clearly labelled and/or colour-coded containers, supported by wall-mounted signage, will enable effective segregation across both construction and operational phases.
- Construction waste will be managed in line with the Waste Management Strategy, with designated storage areas, defined responsibilities, and regular inspections to ensure legal compliance and adherence to the waste hierarchy.
- During operation, the Facilities Management team will manage on-site waste transfers with storage, segregation, and collection arrangements.

Planning Route Comments

Community Feedback

4.41 Attendees at the October 2025 public engagement event expressed concerns regarding the planning process, citing a lack of continuity and transparency between the refurbishment and expansion phases. Overall, feedback indicated that the planning route has been perceived as poorly managed, with residents feeling they have had no opportunity to comment on the proposal in a meaningful way.

Technical Partner Feedback

4.42 No responses have been received from technical consultants in relation to the proposed planning route.

Response:

4.43 It is proposed to seek outline planning permission via the non-urgent Crown Development Route (CDR) due to the national importance of the proposal. This proposal is critical to matters of national and border security; hence it is appropriate to seek consent via this route. The process allows interested parties to review the application and comment on it in a similar way to a normal planning application.

Access and Parking

Community Feedback

4.44 Comments on access and parking primarily focussed on the issues associated with the ongoing refurbishment works for the reopening of the IRC. Residents raised concerns about parking arrangements during construction, citing a lack of designated spaces and inconsiderate parking by contractors. There were questions about using the boatyard as a construction car park with worries about noise and light pollution for nearby homes, particularly if lighting remains on overnight. Many residents complained about the impact of contractor parking on local streets and asked what provisions would be made to alleviate these issues. While the proposed use of the Fort Road car park was welcomed, residents emphasised the need to remove vehicles from Fort Road itself and sought clarity on how parking would be managed when the refurbished IRC becomes operational alongside the IRC expansion construction.

- 4.45 There were also queries about the internal road used for vehicle tracking, with suggestions to move it further from the perimeter fence. The community expressed a desire to retain two existing coastal access paths through the car park and supported the idea of preserving mature trees in the boatyard.

Technical Partner Feedback

- 4.46 Pre-Application advice from Hampshire County Council in relation to highway design recommends the following:

- A Full Transport Assessment and Travel Plan should be submitted with any future planning application. Details of the size, type and volume of vehicles accessing the site should be provided including swept path analysis for largest vehicle.
- The location is not served well by public transport and understood that due to staff shift patterns most of trips will be undertaken by car.
- The rerouting of King Charles III England Coastal Path (KCIII ECP) will require variation to change the legal route that would need to be approved by the Secretary of State.
- HCC receive regular complaints from local residents about parking along Fort Road and Clayhall Road; a contribution towards a TRO for parking restrictions in this area will be required.

- 4.47 Pre-Application advice from GBC in relation to design recommends the following:

- Locations that are not currently well served by public transport may be acceptable when improvements to public transport are included as part of the overall development scheme or as part of programmed proposals in the Local Transport Plan (and supporting documents) or arising from other funding opportunities.
- Safe access should be provided for cyclists and pedestrians and, where practical, priority should be given to pedestrian and cycle movements through the site through the delivery of appropriate measures.
- The King Charles III England Coastal Path runs through to the proposed car park, and it is considered necessary to improve the accessibility along the path to create a more pleasant walking experience.

Response:

- 4.48 Travel Assessment by Stantec responds to concerns by proposing:

- The current primary access to the IRC site will be retained from Dolphin Way for servicing and deliveries. The main staff car park will be provided by an expanded and managed Haslar Sea Wall Car park which is served via the existing access onto Military Road/Fort Road. In line with present arrangements, additional parking will be provided on Dolphin Way which is a privately owned road under the control of the IRC. The current access onto Fort Road will be maintained for emergency services access only.
- Due to the shift pattern demands and the requirement to provide a safer environment for the staff, the parking provision has been designed to support the higher demand for car parking spaces during this time and to prevent any requirement for off-site overspill onto the public highway.
- The proposed car parking for the site will be between 294-302 spaces once IRC is completed, with 35-43 subject to layout provided on Dolphin Way and up to 259 car spaces in the new Haslar Sea Wall Car Park

- The car park would also accommodate 20 parking spaces for the public.
- The scheme on Dolphin Way does not alter the right of way which utilises this link to access the Sea Wall. The new extended car park would result in the slight re-alignment of the right of way and provision of a new path by switching the route from the northern to southern pathway.
- To minimise any risk of offsite parking, the scheme includes a provisional Traffic Regulation Order for Fort Road. This is to remove parking at the junction with Dolphin Way and protect the proposed emergency access.
- A provisional parking option is being considered for the Haslar Sea Wall Car Park for the Haslar IRC Refurbishment operation, including the 20-space allocation for the public car park. The car park will support up to 50 spaces, 1 of which will be allocated as disabled. As this is a temporary car park provision, no electric vehicle (EV) allocation is proposed.
- The 20 spaces for public use will be retained. These will be located in a dedicated car park accessed immediately from Fort Road (via Military Road).
- The staff car park will be constructed to provide approximately 259 car parking spaces including electric vehicle charger points (EVC), blue badge bays and motorcycle spaces.

4.49 Travel Plan by Stantec responds to concerns by proposing:

- A target 10% reduction in “car or van driver” is proposed over the five-year life of the travel plan.
- A range of measures are proposed to achieve this mode share, including travel notice boards and travel information packs for staff.

Healthcare

Community Feedback

4.50 Residents have raised queries about healthcare facilities at Haslar IRC, seeking clarity on whether the development would impact existing local healthcare provisions. There was concern about potential strain on community services and a desire for reassurance that adequate medical support would be available within the IRC without affecting resources for local residents.

Technical Partner Feedback

4.51 Pre-Application advice from GBC in relation to healthcare recommends the following:

- Suitable health infrastructure provision is a key planning consideration under the NPPF. The applicant should consult with the Hampshire and Isle of Wight Integrated Care Board.

4.52 NHS England – The Southeast Region recommended that further consultation be carried out with healthcare providers and confirmed that Medical Architecture team would take the lead in coordinating any responses from NHSE.

Response:

4.53 Primary health care, will be provided on the site. IRC Healthcare facilities to provide comprehensive healthcare and support for residents including GP, nurse-led clinics and health monitoring. Only exceptional accident or emergency requirements will be provided by hospitals.

- 4.54 Healthcare provision is being procured through NHS England and there will be no impact on primary healthcare services provided within the local community.

Detention/Operations

Community Feedback

- 4.55 Attendees at the October 2025 public engagement event raised numerous questions and concerns about detention and operational aspects of the IRC, as well as queries about security measures, such as whether residents would be allowed to leave and if perimeter patrols would be in place. There were also questions about the average length of detention and whether Foreign National Offenders would be housed at the site. Additionally, fears were voiced about the types of individuals who may be detained.

Technical Partner Feedback

- 4.56 Advice from the Department for Science, Innovation and Technology in relation to the proposal operations recommends the following:
- Undertake an assessment of current digital infrastructure provision (mobile and fibre), and an assessment of future connectivity requirements for both the construction phase of development and the operational requirements of the sites.
 - Undertake early engagement with connectivity and infrastructure providers at the planning stage to ensure adequate provision of digital infrastructure and connectivity services.
- 4.57 Pre-Application advice from GBC in relation to design recommends the following:
- LPA has questioned whether enough suitable amenity space e.g. MUGA, sports pitches etc. is proposed for IRC.

Response:

- 4.58 The Haslar Factsheet confirms that: *“The site will be a secure IRC and will have robust physical security measures and appropriate security procedures in place to ensure the facility operates safely and securely, including fencing at the perimeter of the site and security measures in place to keep the site safe and secure, protecting both local residents and detained people. Detained men will be held under immigration powers and will not be free to leave the centre or access the local area or services.”*
- 4.59 All rooms will meet the standards as set out in the accommodation standards Detention Services Order (DSO). Bedrooms will primarily be dual occupancy.
- 4.60 Any provision of recreational, educational, healthcare, living and faith-related facilities for individuals detained at the facility will be contained onsite.
- 4.61 The HO has taken a proactive and productive approach to external engagement since the re-opening of Haslar IRC was announced. Following the completion of the pre-submission stage of engagement activity, the HO is now looking to progress to further stages of communication with key stakeholders, with the aim of ensuring local residents and property/business owners, as well as elected representatives, local authorities and other bodies are kept updated on the progress of development of the Haslar IRC expansion.

5. Conclusion and Next Steps

Conclusions

- 5.1 This Engagement Report has been produced to support the outline planning application for the expansion of Haslar IRC. The report compiles the engagement that has been undertaken at the time of writing, the stakeholders who have been engaged, and the general methods used to engage. The HO identified the key local stakeholders, including the local authority, other statutory organisations such as the NHS, Police and Fire Service, elected representatives, as well as the residents and property owners in the vicinity of the site. A range of engagement methods have been used, including meetings, public events, and written updates. This process demonstrates the Home Office's commitment to conducting thorough and diligent engagement in order to gather the information necessary to support informed decision-making.
- 5.2 This report discusses the key points raised through engagement with local and technical stakeholders. Furthermore, ongoing proactive, regular engagement with all relevant stakeholders is proposed for the duration of the programme, until the planning process is completed, through to construction and service transition, and for the operational lifetime of the IRC.
- 5.3 This report identifies and summarises the key themes that have emerged from the engagement work and how the HO will address them. As noted, this report is to support the preparation of an Outline Planning Application. A Planning Statement is submitted in support of the proposal, and this document draws upon the engagement that has occurred with stakeholders to ensure appropriate controls for commitments made by the HO are secured through planning conditions or limitations.

Next Steps

- 5.4 Following the completion of the pre-application stage of engagement activity which related to sharing information regarding the planning application for the expansion of Haslar IRC, the HO is now looking to progress to further stages of communication and engagement with key stakeholders.
- 5.5 The aim of ongoing and future engagement is to keep local residents and property/business owners, elected representatives, local authorities and other statutory bodies and technical engagement partners updated on the progress of Haslar IRC development.
- 5.6 Subject to any approval and/or planning conditions, further technical discussions with relevant stakeholders will also take place.
- 5.7 Consideration is also being given to engagement with the local community, particularly those living close to the site. The HO is looking into how and when to share further updates with residents going forward but generally will aim to update as and when plans for the site are further developed and ahead of any construction.

Appendix A: Information provided at the public engagement event

Home Office

Haslar Immigration Removal Centre (IRC) Public Event



Welcome to this public event for Haslar Immigration Removal Centre. This event is being held to provide more information on the Phase 2 new build proposals.

As part of our planning for the development of this centre, we are talking to local stakeholders including councillors, police, fire and health services as well as members of the local community.


Home Office

The requirement for Haslar

As part of the Government's plans to tackle illegal migration, the Home Office are expanding detention facilities, to assist with the removal of those with no right to remain in the UK.

Why this location?

As a previous Immigration Removal Centre, Haslar offers a suitable opportunity to use and improve existing accommodation, as well as develop further capacity to provide safe, secure and fit for purpose detained accommodation for men. Site assessments were carried out and took into consideration the location of the site and accessibility of services and utilities.



Background

Haslar extends to around 4 hectares. It is accessed via Dolphin Way off Fort Road.

2002 - Formerly, Haslar operated as a youth offenders' facility, then became an Immigration Removal Centre in February 2002.

2015 - The Government announced the closure of Haslar. It was an old centre and required considerable investment for continued long term use. Its previous operational capacity was for 172 males and inspections found the former site to be safe and well run.

2022-Present - The Home Office announced plans to open a new 600 bed Immigration Removal Centre on the former site. Phase 1 includes the refurbishment of the existing site - these works are underway.

Home Office

Our Plans

The Home Office is not simply re-opening the former Haslar Immigration Removal Centre. We acknowledge that by the time it closed in 2015 it required considerable investment for continued long term use. The planned development will take place in two phases.

- **Haslar Phase 1** is renovating the existing buildings with an operational capacity of 130 (compared to the 172 in 2015).
- **Haslar Phase 2** will be a new build, and the entire redeveloped site will have an operational capacity for approximately 600 adult men.

When planning this development, the Home Office has taken recommendations made by inspection bodies into account.

When open, it will provide safe, secure and fit for purpose detained accommodation operated in line with the Detention Centre Rules 2001.

Existing View From West Side



Proposed View 1



Existing View From South Side



Proposed View 2





Current Construction - Phase 1 Refurbishment

Proposed refurbishment work has already commenced to the existing buildings and did not require planning consent, falling within the scope of permitted development rights.

Work includes the replacement of all pre-existing electrical, plumbing, drainage and data services. Additionally, structural repairs, including the replacement of all windows and roofing, are being completed. Solar and heat pumps to be installed.

External Works

- Demolition and/or removal of redundant dilapidated temporary buildings and structures.
- New extensions constructed to match existing upgraded materials.
- Replacement of defective provisions to improve the safety, security, future maintenance and thermal performance of the building.

Internal Works

- Fabric repairs and redecorations and renewal of finishes.
- Replacement of defective provisions including redundant mechanical and electrical services, infrastructure, fixtures, plant and equipment with new energy efficient equipment.



Future Construction - Phase 2 New Build

New accommodation buildings (up to 12 metres in height) with associated services for interview rooms, administration, dining areas and care and separation unit (footprint approximately 3480 square metres).

Other additions include:

- Fencing and external works.
- Construction of the car parking area, including electric vehicle spaces, cycle shelters and storage for staff and visitors.
- Application of features to make the site meet a sustainable drainage strategy.
- Creation of biodiversity enhancements and landscaping.



Services Provided:

- Provide a full range of recreational, educational and healthcare facilities which mirror other centres.
- Providing onsite facilities including a cultural kitchen, barbers, resident shop, access to an IT suite, multi-faith/prayer rooms, and access to wellbeing and legal services.

Security Measures:

- The centre will be secure, people will be detained under immigration powers and not be free to leave.
- Suitable security measures and procedures in place to ensure the site operates safely and securely.
- Welfare and Safety of residents prioritised throughout.

During Construction:

- Jobs for local contractors.
- Use of local supply chains for materials.



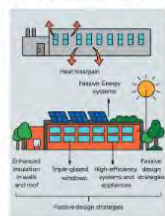
Sustainability – Environment & Climate Change

We will measure our sustainability performance using Building Research Establishment Environmental Assessment Method (BREEAM). This is a sustainability certification method.

It uses 10 different measurement categories such as materials, energy, water, waste, pollution and more, to rate environmental performance and give it a score.

- Phase 1 target rating of "Very Good".
- Phase 2 target rating of "Excellent".

Our passive design methods to reduce energy:



- Air source heat pumps.
- PV solar panels to offset energy use.
- Improved insulation and air tightness.
- High performance windows.
- Heat recovery.

Key Highlights

- EPC A rating.
- All-electric IRC.
- Improved emission rates using modern electric heating and LED lighting.
- Carbon savings of 206 tonnes per year.
- 817 tonnes of asbestos removed so far.



Useful Links



Haslar Immigration Removal Centre - Factsheet



Detention Centre Rules 2001

Appendix B: Haslar IRC Factsheet

[Haslar immigration removal centre \(IRC\): factsheet - GOV.UK](#)

Appendix C: Natural England

Date: 10 July 2024
Our ref: DAS/457530
Your ref: Haslar IRC, Gosport – Phase 1 & 2 Works



Customer Services
Hornbeam House
Crewe Business Park
Electra Way
Crewe
Cheshire
CW1 6GJ

0300 060 3900

[REDACTED]

BY EMAIL ONLY

Dear [REDACTED]

Discretionary Advice Service (Charged Advice) 457530

Development proposal: Haslar IRC, Gosport – Phase 1 & 2 Works

This advice is being provided as part of Natural England's Discretionary Advice Service. AtkinsRéalis and Wild Capital (on behalf of AtkinsRéalis) have asked Natural England to provide advice upon:

- The Shadow Habitats Regulations Assessment for Phase 2 of the IRC works
- The Habitat Management and Monitoring Plan for the Stubbington Brent Geese Reserve
- The nutrient neutrality assessment for the Stubbington Brent Geese Reserve

This advice is provided in accordance with the Quotation and Agreement dated 22 November 2023.

The following advice is based upon the information within:

1. STAGE 01 HABITAT REGULATIONS ASSESSMENT & STAGE 02 APPROPRIATE ASSESSMENT (REF: 8607-R13-HRA-AA-P1P2)
2. APPENDIX C - Habitat Management and Monitoring Plan, Stubbington Brent Geese Reserve
3. NUTRIENT NEUTRALITY ASSESSMENT (REF: 8607-R13-NN), Stubbington Brent Geese Reserve

Natural England's Advice:

Shadow Habitats Regulations Assessment (sHRA)

The sHRA lacks a full in-combination assessment. The document does refer to the potential in-combination impacts arising from the proposal and the 23/00061/OUT however this is likely not comprehensive. Natural England do not formally advise on which plans or projects should be scoped into an sHRA, but it appears that 23/00061/OUT is the only project considered.

It is generally well-established that the scope of an in-combination assessment is restricted to plans and projects which are 'live' at the same time as the assessment being undertaken. These can potentially include:

- The incomplete or non-implemented parts of plans or projects that have already commenced;
- Plans or projects given consent or given effect but not yet started.
- Plans or projects currently subject to an application for consent or proposed to be given effect;
- Projects that are the subject of an outstanding appeal;

- Ongoing plans or projects that are the subject of regular review and renewal
- Any draft plans being prepared by any public body
- Any proposed plans or projects that are reasonably foreseeable and/or published for consultation prior to application

Other than the lack of in-combination assessment, Natural England broadly agree with the conclusions of the sHRA but do provide the following detailed comments:

Section 1.1 of the sHRA notes that '*Natural England subsequently provided a consultation response on the initial HRA submission (email dated 11th March 2024) and all comments are now addressed.*' For ease of responding and checking this is correct, I would be grateful if you could set out our comments and how they were responded to directly. Cross referencing the comments with the new text of the sHRA would be possible but time consuming (and costly), so if you have a table which includes the NE comments and subsequent changes to the sHRA this would allow for easy cross reference and review.

Table 2 – Screening Assessment of Likely Significant Effects (LSE)

Section [D] (page 14) contains a factual error regarding the qualifying features which use site G63 – this is a core site for Brent Goose with a maximum count of 215 birds, not a site mainly used by Oystercatcher. The text here also refers to 'parcel G61' but I am not able to locate this.

Section [D] would generally benefit from an update as it actually contains a lot of information which is not pertinent to whether or not the project has the potential to cause LSE. The current habitat condition is described as if to imply the site is no longer within the network. It is also not clear why Phase 1 works do not pose LSE, but Phase 2 works do, because they both rely on the same text in section [D]. For this to make sense, section [D] should be updated to detail how the site poses LSE (i.e. by pointing to the SWBG Strategy and value of core sites). Natural England have agreed that the direct loss of FLL from Phase 1 works could be screened out of the HRA due to the small scale of impact (but this is not explained in the table).

Table 3 - Appropriate Assessment of Significant Effects and Mitigation Measures

Natural England agree the identified avoidance and mitigation measures are appropriate to ensure that the project does not pose an adverse effect on the integrity of designated sites. We would recommend updating the column headings to reflect this (i.e. remove the word compensation, and change 'residual effects' to 'adverse effect or AEOL').

Section 6.0 – Conclusion

We provide further advice on the nutrient neutrality topic below, but it is worth noting that the conclusions of the sHRA here are based on the condition that the Stubbington Reserve is adopted and 'online'. This is acceptable in principle, but just worth noting that this conclusion is conditional and so the sHRA is not yet 'complete'. You should engage with the relevant local planning authorities as early as possible to allow them confidence in the nutrient strategy and conclusions of your sHRA.

Habitat Management and Monitoring Plan, Stubbington Brent Geese Reserve

Natural England have provided initial informal comments directly to Wild Capital, but it seems sensible to integrate our comments and advice on the habitat management and monitoring plan (HMMP) here into this formal advice.

In accordance with the Habitats Regulations, when the Competent Authority decides whether or not future plans/projects can be mitigated by this potential scheme, they will have to have ecological, legal and financial certainty that the mitigation will succeed in perpetuity. Natural England are primarily responsible for advising on ecological certainty, but we also seek to make Competent Authorities and applicants aware of the importance of financial and legal certainty, as relevant to the Habitats Regulations.

Ecologically, Natural England agree that the HMMP is a high quality detailed management plan,

which if implemented and secured correctly, should provide a replacement for the functional loss of Core Site G63. The management plan contains comprehensive details of habitat management, habitat enhancement, remedial activities, site monitoring and access management. It also contains good evidence to demonstrate the site's ability to provide functional linkage for the Solent Wader and Brent Goose Network. Recognising the importance of core sites, the mitigation site is being provided at 2x what is being lost. This helps to ensure any decision making is suitably precautionary, and in Natural England's expert opinion, this is an appropriate quantum of mitigation land. Either the sHRA or the HMMP could be strengthened by providing additional text which specifically refers to the aim of the mitigation being to replace the functionality of land lost.

With regard to Financial security, we would advise that the LPA will need to be provided with the relevant financial details for them to have confidence the scheme is funded in perpetuity.

With regard to Legal security there are a number of potential issues here which we would advise discussing with the competent authority as early as possible. As noted above, we agree the quantum of mitigation set out in the sHRA is appropriate. This would leave the identified Stubbington Geese Reserve with 7.1ha of land which could be allocated to provide mitigation for future development impacting the local SWBG network. Through planning obligations or conditions it is assumed that specific parcels of the mitigation site can be allocated to deal with the impacts of specific development proposals, but this should be confirmed with the LPA as it will be their duty to secure this.

The HMMP indicates that the LPA or Responsible Body for Review is to be confirmed, as is the 'Competent Persons Responsible for HMMP'. It is apparent that the security of this legal mechanism has not yet been finalised and that Wild Capital are approaching multiple potential partners to act as Responsible Bodies through S106 or Conservation Covenant. This must be finalised in order for an appropriate assessment to consider it adequate mitigation. If a private management company is set to act as the Responsible Body then step-in-rights agreed in writing with the LPA would provide increased legal certainty.

Nutrient Neutrality Assessment

We would re-iterate the importance of the text above regarding the need for financial, legal and ecological certainty. Natural England agree that in-principle the goose mitigation site can also serve as a nutrient mitigation site, providing nutrient 'credits' for future development within the catchment. In principle, we are not opposed to the use of 'private delivery bodies' to deliver nutrient mitigation. With respect to the ecological certainty, at this stage Natural England are content that if the land use can be secured and appropriately managed in-perpetuity, the proposed scheme would permanently change the 'nitrogen load' from the land. We agree that the total nutrient credits have been calculated in accordance with the Natural England methodology and that the use of the 'greenspace' figure in Stage 3 of the calculation is appropriate.

Our advice to the applicant and the Competent Authorities is that, for this plan to act as suitable in-perpetuity mitigation for future plans and projects it must:

- Be certain to succeed following the general article 6/*Waddenzee* (C127-02) principles and the 'dutch nitrogen' (C-293/17 and C-294/17) cases.
- Demonstrate that the funding for the ongoing management is secured and sustainable.
- Ensure the sale of land does not impinge upon the delivery of the agreed management principles (i.e. no N inputs/agricultural activities)
- Be subject to a strict monitoring programme which ensures the legal agreement is adhered to and that the site maintains its function as mitigation in perpetuity.

The detail for the delivery of the nutrient mitigation is split between the two documents (HMMP & Nutrient Assessment). At this stage we would advise that more detail is required on how the nutrient levels will be managed at the mitigation site (e.g. how nutrient enrichment would be avoided). The management prescriptions set out in the HMMP are sensible, but it is not clear how this will be legally secured. Likewise, the monitoring programme for SWBGs is really strong, but there is no detail on monitoring in relation to nutrient levels. It is assumed that the monitoring and delivery of

the bird reserve would effectively also be a monitoring of the nutrient mitigation, but this should be specified in the documentation.

Additionally it is worth noting that Natural England understands there are legal complexities involved with delivery of cross-boundary (planning authority boundaries) mitigation delivery and the Competent Authority should be aware of this. It will be necessary for the Competent Authority to be sure that any cross-boundary agreements are deliverable.

Protected species

The advice on this proposal, and the guidance contained within Natural England's standing advice relates to this case only and does not represent confirmation that a species licence (should one be sought) will be issued. Further information can be found at Annex 1.

The advice provided within the Discretionary Advice Service is the professional advice of the Natural England adviser named below. It is the best advice that can be given based on the information provided so far. Its quality and detail is dependent upon the quality and depth of the information which has been provided. It does not constitute a statutory response or decision, which will be made by Natural England acting corporately in its role as statutory consultee to the competent authority after an application has been submitted. The advice given is therefore not binding in any way and is provided without prejudice to the consideration of any statutory consultation response or decision which may be made by Natural England in due course. The final judgement on any proposals by Natural England is reserved until an application is made and will be made on the information then available, including any modifications to the proposal made after receipt of discretionary advice. All pre-application advice is subject to review and revision in the light of changes in relevant considerations, including changes in relation to the facts, scientific knowledge/evidence, policy, guidance or law. Natural England will not accept any liability for the accuracy, adequacy or completeness of, nor will any express or implied warranty be given for, the advice. This exclusion does not extend to any fraudulent misrepresentation made by or on behalf of Natural England.

Yours sincerely,

[Redacted Signature]

Senior Officer
Thames Solent Team

Annex 1

European Protected Species

A licence is required in order to carry out any works that involve certain activities such as capturing the animals, disturbance, or damaging or destroying their resting or breeding places. Note that damage or destruction of a breeding site or resting place is an absolute offence and unless the offences can be avoided (e.g. by timing the works appropriately), it should be licensed. In the first instance it is for the developer to decide whether a species licence will be needed. The developer may need to engage specialist advice in making this decision. A licence may be needed to carry out mitigation work as well as for impacts directly connected with a development. Further information can be found in Natural England's ['How to get a licence'](#) publication.

If the application requires planning permission, it is for the local planning authority to consider whether the permission would offend against Article 12(1) of the Habitats Directive, and if so, whether the application would be likely to receive a licence. This should be based on the advice Natural England provides at formal consultation on the likely impacts on favourable conservation status and Natural England's [guidance](#) on how the three tests (no alternative solutions, imperative reasons of overriding public interest and maintenance of favourable conservation status) are applied when considering licence applications.

Natural England's pre-submission Screening Service can screen application drafts prior to formal submission, whether or not the relevant planning permission is already in place. Screening will help applicants by making an assessment of whether the draft application is likely to meet licensing requirements, and, if necessary, provide specific guidance on how to address any shortfalls. The advice should help developers and ecological consultants to better manage the risks or costs they may face in having to wait until the formal submission stage after planning permission is secured, or in responding to requests for further information following an initial formal application.

The service will be available for new applications, resubmissions or modifications – depending on customer requirements. More information can be found on [Natural England's website](#).

Appendix D: Historic England

From: [REDACTED]
Sent: 13 January 2026 12:02
To: [REDACTED]
Cc: [REDACTED]
Subject: 285223 - Haslar IRC Phase 2 support

Hi Georgia, just an update. I have heard back from Historic England:

The advice we provided Home Office in 2024 was part of a free-cycle of pre-application advice, which concluded with our response.

1

As indicated in our letter, we feel the impact on Fort Monckton is likely to be low and our comments on the planting for screening purposes still stand.

We provided some comments on the design of the new buildings in relation to their location immediately adjacent to the Haslar Barracks Conservation Area. The design does not appear to have changed. We also requested contextual elevations. However, given the potential impact on the Conservation Area is likely to be modest we would defer to Gosport BC going forward. The Conservation Officer there, Richard Whittington, should be able to provide further advice on this.

This confirms that HE are not especially concerned with Fort Monckton and that they are content to defer on the Conservation Area to the LPA.

Regards,

[REDACTED]
Principal Consultant (Heritage)



Wessex Archaeology
Portway House, Old Sarum Park, Salisbury, Wiltshire SP4 6EB
www.wessexarch.co.uk

Appendix E: Environment Agency

From: Partnership and Strategic Overview team, HLOW <psohlow@environment-agency.gov.uk>
Sent: 27 February 2023 13:46
To: [REDACTED]
Cc: SSD Enquiries
Subject: Product 4, 5 & 6 Request for Clayhall, Gosport - Our ref: SSD/298661
Attachments: Open Government Licence.pdf; Use of EA Information for FRAs.pdf; Defence map.pdf; Flood Map for Planning (Rivers and Sea).pdf; Levels Map.pdf; Risk of Flooding from Surface Water.pdf

Dear [REDACTED]

Enquiry regarding Product 4 for Clayhall, Gosport.

We respond to requests under the Freedom of Information Act 2000 and Environmental Information Regulations 2004. The information is attached.

The site may be affected by an extreme flood. According to our published flood map, which provides a general estimate of the likelihood of flooding across England & Wales, the property is shown to be within Flood Zone 3 - an area which may have a 0.5% chance of flooding annually (1 in 200), **ignoring** the presence and effect of any flood defences.

The Environment Agency has no record of flooding to this property/area. Please note our records are not comprehensive and may not include all events. I recommend contacting the Lead Local Flooding Authority, "Hampshire County Council" or the Local Authority, "Gosport Council" for a more comprehensive flood history check.

Information on any nearby sea defences is available from Gosport Council.

Defences – See attached map.

Flood Levels – Please see the attached map showing the flood levels for your site. These levels have been taken from East Solent Coastal which was produced in 2018 by JBA.

Product 5 & 6 can be downloaded here: <https://ea.sharefile.com/d-s75f4ee2e886940989fb06ed09cf81e45>

Appendix F: Crown Premises Fire Safety Inspectorate

From: [REDACTED]@communities.gov.uk
Sent: 01 December 2025 09:47
To: [REDACTED]@homeoffice.gov.uk
Subject: [REDACTED]

Do you trust this email? This email originated from outside the Home Office, or came from a Home Office system that has not been certified. Please exercise caution before opening attachments or clicking on links within this email of any suspicious email, particularly from unknown senders.

OFFICIAL

Hi [REDACTED],

I have had a look through the document titled 'PRE-APPLICATION STATEMENT - Haslar IRC' and there isn't anything specific that relates to fire safety.

As I mentioned a short while back, the comments made by Adam in relation to Campsfield Phase 2 will have the same application to Haslar. We will be happy to look over anything fire safety specific and as you know, we generally then formally comment to the building regulation officers (formally approved inspectors) at a RIBA Stage 4 point.

Kind regards,



[REDACTED] MIFireE
Crown Premises Fire Safety Inspectorate
Piccadilly Gate
Store Street
Manchester
M1 2WD

e: [REDACTED]@communities.gov.uk | m: [REDACTED] | t: [REDACTED] | Teams: [REDACTED]

Appendix G: Hampshire County Council LLFA & Highways

Site Reference:	SWM-PRE/2025/0739	
Review Date:	18/12/2025	
Reviewer:	SR	
Authorised:	SR	
Total No. Pages		5

Proposal Description:

Expansion of IRC - new accommodation and facilities buildings, Energy Centre, Community Garden, 230 space carpark, recreational space and landscaping.

Site Background

Pre-development status	Part greenfield & brownfield		
Modelled Flood Risk	Historic Flooding - split by data owner		
Fluvial Flood Zone 2	Y	Highways	N
Fluvial Flood Zone 3	Y	LLFA	N
Surface Water High	Y	Environment Agency	N
Surface Water Medium	Y	Watercourses	
Surface Water Low	Y	Main River	N
Groundwater risk zone	N	Ordinary Watercourse	N
Priority Area	N	Predominant Geology	Selsey Sand Formation

Name of Documents Reviewed	Document reference No.
Proposed Development Site Plan P2	323319-15207-ATR-000-GF-DR-A-0250-S4-D0100 S4

Summary of submission, key points requiring assessment, response to specific developer queries

The proposals are to construct secured residential buildings and car parking on the site which is thought to be largely greenfield. It is proposed to utilise filter drains, permeable paving, swale and an interceptor with flows pumped into existing outfall at restricted discharge. Some cellular storage is proposed off line to manage any additional storage requirements.

It is noted that the site is affected by coastal flooding and it was clarified that the east portion of the site is protected through coastal defences but there is flood risk arising from the north. This has been modelled and discussions are underway with the Environment Agency. While we do not comment on coastal matters, it will be necessary to ensure that the surface water drainage will continue to function during a coastal event and that exceedance routes are managed appropriately. It was also highlighted that a sequential approach to the site layout is usually expected with dwellings placed outside of areas of flood risk. This does not appear to be the case for this site but again, it is expected that the Environment Agency will comment on this.

The connection point is believed to be a Southern Water sewer. While this can be accepted as a connection point, further information will be required to demonstrate acceptance of the connection and allowable flow rate.

The site will be assessed on the requirements in the new national standards and the narrative below has been provided to confirm the information that would be required.

For further information please refer to our website: <https://www.hants.gov.uk/landplanningandenvironment/environment/flooding/planning>

Review of Proposals

The following sections review the information provided in line with our guidance and checklist and provide commentary as to the suitability of the information if it was submitted for planning. If no relevant information is provided then guidance is included on what should be submitted for planning. Any key issues identified are highlighted for further discussion however this is based solely on the information submitted

Required information: Existing Site Conditions		Commentary
Topographic survey plan		<p>Site levels.</p> <p>Existing drainage features (including outside of the boundary particularly in relation to connecting watercourses adjoining the site).</p>
Flood risk assessment/statement (Planning Practice Guidance)		<p>Extents of flood risk areas and flow routes (considering all sources of flooding) including those from offsite locations. Majority of coastal section, including car park, at risk of coastal of flooding</p> <p>Assessment of the flood risk vulnerability of the proposed development and its suitability in relation to the flood risk at the site. Development must be steered to areas of lowest risk and a sequential approach taken in relation to layout. There should be no impediment to flow paths and areas at risk of flooding (from all sources) must be avoided.</p>
Evidence for built development in flood risk areas	N/A	<p>Site specific modelling may be required to demonstrate more accurate extent of flood risk if development considered in areas shown at risk from national modelling., e.g. updated flood risk modelling results using an appropriate methodology. Refer to the flood modelling technical note.</p> <p>Appropriate mitigation, e.g. flood compensation areas (see technical note).</p>
Assessment of existing drainage systems (National Standards for SuDS 3.39.2)	N/A	<p>Locations, dimensions, and condition assessments of existing drainage features.</p> <p>Extents of existing drainage catchments including a downstream assessment of the discharge point to confirm continuity beyond the site. Not applicable. Discharge point to the sea.</p> <p>Standing water levels in watercourses (risk of submerged outfalls). Modelling the drainage system with a submerged outfall may be required where frequently submerged outfalls are likely e.g. tidal, groundwater flooding prone watercourses etc. For Main Rivers, the Environment Agency may be able to advise on peak levels. An assessment of submerged outfall as a result of high tide needs to be considered.</p>
Assessment of pre-development runoff rates and volumes (National Standards for SuDS 3.26, 3.31)		<p>Greenfield runoff rates and volumes for the following storm events:</p> <ul style="list-style-type: none"> • 1 in 100 years (1% AEP) • 1 in 30 years (3.3% AEP) • 1 in 2 years (approximately Qbar) • 1 in 1 year (100% AEP) <p>Discharge volumes should be calculated using the 1 in 100 6-hour storm (National Standards for SuDS 3.19).</p> <p>An appropriate statistical method should be used</p> <p>The site will be discharged to the sea and can have an uncontrolled outfall however an understanding of pre/ post runoff rates should still be provided. Given that it is proposed to connect to an existing asset, an understanding of the allowable discharge rate will be required.</p>
Site investigation report (National Standards for SuDS 1.15,1.17, 3.11, 3.14, 3.39.2, 4.16.1)	N/A	<p>Borehole logs showing geology.</p> <p>Results of sufficient infiltration testing (three successive tests) at the depth and location of any proposed infiltration features in accordance with BRE365. The lowest rate achieved at each test location must be used for the drainage design.</p>

		<p>Results of groundwater monitoring undertaken at suitable locations and depths across the site to demonstrate a suitable unsaturated zone. Monitoring must be undertaken to capture the likely peak groundwater level and timings will vary depending on the geology i.e. chalk sites are expected to have peak levels between January and May, river terrace deposits are likely to have peak levels between November and February. Please see infiltration testing and groundwater monitoring technical note for additional details.</p> <p>Site investigation is unlikely to be required given discharge is proposed to the sea</p>
<p>Detailed Drainage Strategy Required information:</p>		<p>Where layout is fixed To include:</p>
<p>Detailed drainage strategy/ Technical Note</p>		<p>A detailed written surface water drainage strategy, following the drainage heirarchy, with references to drawings and calculations that is compliant with policy, demonstrating that the site can be suitably drained without increasing the risk of flooding.</p> <p>In addition to the above, reserved matters applications should provide a technical note summarizing what was agreed at outline, any overarching phasing plans, and how this application fits with the wider site drainage.</p>
<p>Detailed drainage layout plan</p>		<p>A detailed surface water drainage layout showing a full drainage network of sufficient capacity, in appropriate locations with due regard to flood risk areas, overland flow routes and connectivity to discharge locations taking into account final site levels.</p> <p>A plan showing flooded extents and depths managed effectively within the site, where they exist for the 1 in 100-year storm event.</p> <p>Easements or access provision must be provided to retain access to SuDS features and watercourses for maintenance with sufficient information provided to demonstrate maintenance can be undertaken appropriately. Designs must consider access requirements for maintenance machinery (e.g. basin slopes). Include who is responsible for any defences in relation to coastal risk</p> <p>Culverting of watercourses must be restricted to where access is required <u>only</u>, and consent sought from the relevant authority. It is not believed that there will be any impacts on watercourses as a result of the works.</p> <p>Please review our consenting guidance at www.hants.gov.uk/changewatercourse for more information. Please note, consent is a separate process from planning, and the granting of a planning application does not guarantee that ordinary watercourse consent will be granted.</p>
<p>Detailed hydraulic calculations</p> <p>(National Standards for SuDS 3.3 - 3.9, 3.32-3.37).</p>	<p>N/A</p>	<p>Detailed hydraulic calculations produced using industry-standard software , the most up-to-date rainfall data, demonstrating sufficient capacity in the drainage network and that post-development runoff rates and volumes (where appropriate) do not exceed pre-development runoff rates and volumes (where appropriate) will be managed in accordance with the minimum requirements of the national standards. Simulation results should be presented for the following storm events:</p> <ul style="list-style-type: none"> • 1 in 100 years (1% AEP) • 1 in 30 years (3.3% AEP) • 1 in 2 years (approximately Qbar) • 1 in 1 year (100% AEP) <p>Appropriate climate change allowances for peak rainfall intensity must be applied to the 1 in 30 year and 1 in 100-year storm events. Peak rainfall allowances must be applied in accordance with the location of the site and the design life of the development. It is noted that free discharge is permitted into the sea and discharge rates will be restricted depending on the asset owner requirements of the discharge point</p> <p>Appropriate allowances for urban creep must be applied to all impermeable areas within residential curtilages (excluding flats and apartments). Urban creep is not required for this site.</p> <p>The drainage network should be sized to contain all contributing permeable and impermeable areas.</p>

		Any flooding anticipated for the 1 in 100 storm event plus a peak rainfall climate change allowance must be demonstrated to be safely managed within the site. Flooding of buildings, utility plants, or safe access and escape routes will not be accepted.
Interception (National Standards for SuDS-Standard 2)	N/A N/A	Provide a plan with interception features, associated contributing areas, and design parameters. Include calculations proving interception storage for the full impermeable area and any contributing permeable areas. Interception must be able to store 5mm rainfall. Hand calculations are usually sufficient; complex sites may use modelling. Given that the entire site is being drained to the sea further information will not be required. See the rainfall interception technical note for more information.
Agreement in principle for asset connection (National Standards for SuDS 1.20,1.28)		If draining to a third-party asset (e.g. adopted sewer), obtain agreement in principle from the asset owner and submit this with the application. A capacity check will identify the maximum discharge rate however we will still require greenfield equivalent rates regardless of additional capacity being available within the sewer. confirmation needed on any permissions required to connect to the sea. FRAP may be required but this will be separate from the planning process
Water Quality (National Standards for SuDS 4.1 – 4.8, 7.16)	N/A	An assessment of the pollution hazard of the development and proposed mitigation offered by the SuDS features using the methodology in the SuDS Manual C753 unless stated otherwise in local plans). SuDS treatment trains are expected as standard. Evidence of manufacturer's technical specifications if proprietary treatment systems (items not listed in the simple index approach tables) are proposed. Discharge to the foul sewer will only be accepted where justified by pollution risks. See pollution prevention for businesses. Potential pollution/ water quality impacts during blockage, pump failures scenarios etc should also be identified.
Flood exceedance flow route plan (National Standards for SuDS 3.6, 3.38 – 3.40, 7.3, 7.16).		A plan showing how exceedance flows will be managed appropriately through the site when the capacity is exceeded and mimic the pre-development situation. Blockage and pump failure risks should be considered and managed. Details of how flow routes are prevented from entering buildings, such as road camber and kerbs, and finished floor levels of buildings. Temporary flooding of roads or recreational areas etc should consider the risks during flooding and rehabilitation post flooding. Road flooding should be no greater than low hazard as per FD2320/TR2 and should not pose a risk to identified safe access and egress routes.
Existing flood routes through site National Standards for SuDS 3.6, Principal 8		Offsite floodwater from events up to a 1-in-100-year probability, as indicated by the surface water flood map or LLFA data, must be safely routed through the site. This routing should avoid increasing flood risk or interfering with the site's drainage system and must be shown on a plan. If interaction with the proposed drainage system cannot be avoided, appropriate mitigation measures must be implemented. There are no specific flow routes identified from the available information for the site. Consideration will need to be given to potential runoff from the surrounding areas and exceedance routing considered to ensure this can be managed within and around the site.

<p>SuDS management and maintenance details</p> <p>(National Standards for SuDS 4.5.1 & 4.10, 7.8)</p> <p>Standard 7</p>	<p>N/A</p> <p>N/A</p>	<p>A schedule of maintenance tasks, to include descriptions, frequencies, role of the drainage system, design life/replacement frequencies of components and the responsible parties for maintaining each part of the drainage system (including any adoption agreements) and any watercourses is required. This should identify features prone to blockage and actions to take if blockages or a pollution incident occurs. Rehabilitation requirements following a flood.</p> <p>A plan showing where different parties have responsibility for maintaining SuDS and watercourses, including easements. Colour coding by maintenance responsibilities is recommended. See the maintenance plan technical note.</p> <p>Details of how drainage features will be protected during the construction period, what silt management and rehabilitation would be required before site occupation</p> <p>A phasing management plan is required to address construction risks where drainage systems serve different parts of the site and are implemented at different times. The plan must also include remediation measures to ensure the drainage system meets its intended design condition before the development is occupied.</p> <p>Construction Risk Mitigation: Identify vulnerable drainage features and mitigation measures during construction. It should be clear how the drainage system will be protected during construction from risk that may affect the functioning of drainage system and refer to Construction Risk Technical Note for guidance.</p> <p>Construction Drainage Plan: Include an annotated drawing showing temporary drainage to be installed at the start of construction and any mitigation to protect the drainage during construction</p>
<p>Verification report in Catchment Priority Areas</p>	<p>N/A</p>	<p>A statement written by a suitably qualified person that confirms the adequacy and quality of the installed drainage system. Qualification to be listed.</p> <p>Survey evidence such as CCTV surveys of pipe networks and invert levels of control structures.</p> <p>Photographs in situ, as-built drawings, and hydraulic calculations for the installed drainage system. Design changes during construction must be shown not to impact drainage performance.</p> <p>A summary of any works affecting watercourses.</p> <p>GIS shapefile of the red line boundary with as-built drainage plans.</p>
<p>As built details (outside a Priority Area)</p>		<p>Provide via planning condition as-built drawings for the drainage system and a GIS shapefile of the red line boundary.</p>
<p>Amenity Statement</p> <p>(Standard 5- National Standards for SuDS)</p>	<p>N/A</p>	<p>Where public access is involved, SuDS should also offer amenity. Use LPA landscape guidance, landscape character assessments, green infrastructure strategies, design policies and design codes to inform design. See the amenity and biodiversity technical note for more information.</p> <p>Label amenity features on drainage drawings</p> <p>Explain the amenity provision via a SUDS section in the Design and Access Statement.</p> <p>If amenity isn't practical or required by LPA policy, state the reason. It is noted that the site is restricted and amenity is not required</p>

Biodiversity Statement.

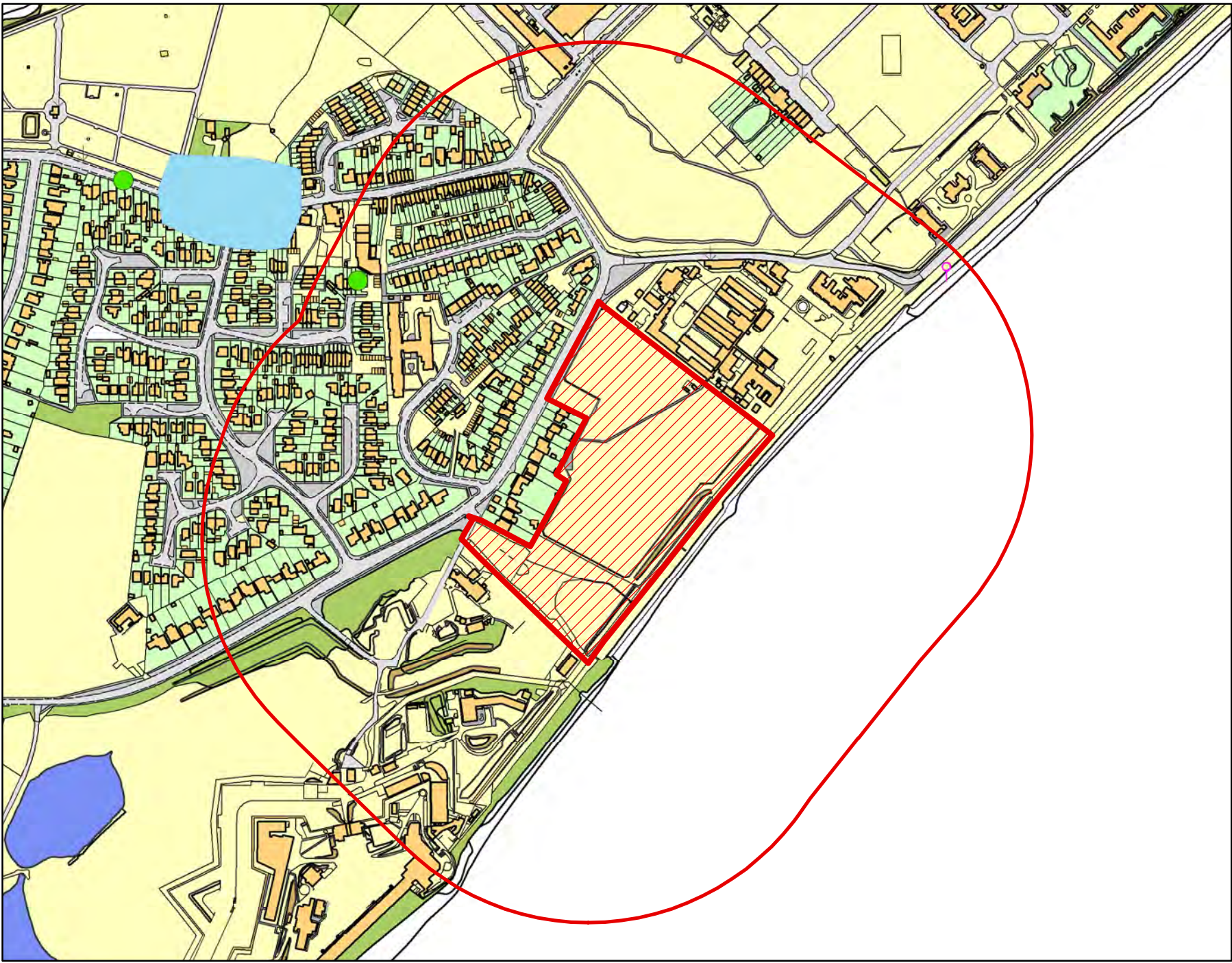
(Standard 6- National Standards for SuDS)

SuDS should support biodiversity. SuDS should be a means for delivering already required biodiversity value. This is not an additional biodiversity requirement. See the amenity and biodiversity technical note for more information.





Label biodiversity supporting SuDS features on drainage plans.

Provide a section within the biodiversity statement demonstrating the suitability of the SuDS design for supporting biodiversity.

If not feasible (e.g. a biodiversity provision is not required by LPA policy or National Policy), justify in the biodiversity statement.




Legend

-  Site
-  250m Buffer
-  Recorded Highway Flooding
-  Recorded Highway Flooding in Hampshire

Hampshire Flood Enquiries

enq_status_name

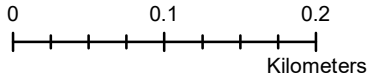
-  Resolved Flood Enquiry

Surface Water Management Pre-app Request

Historic Flooding Record

Haslar IRC

Notes:

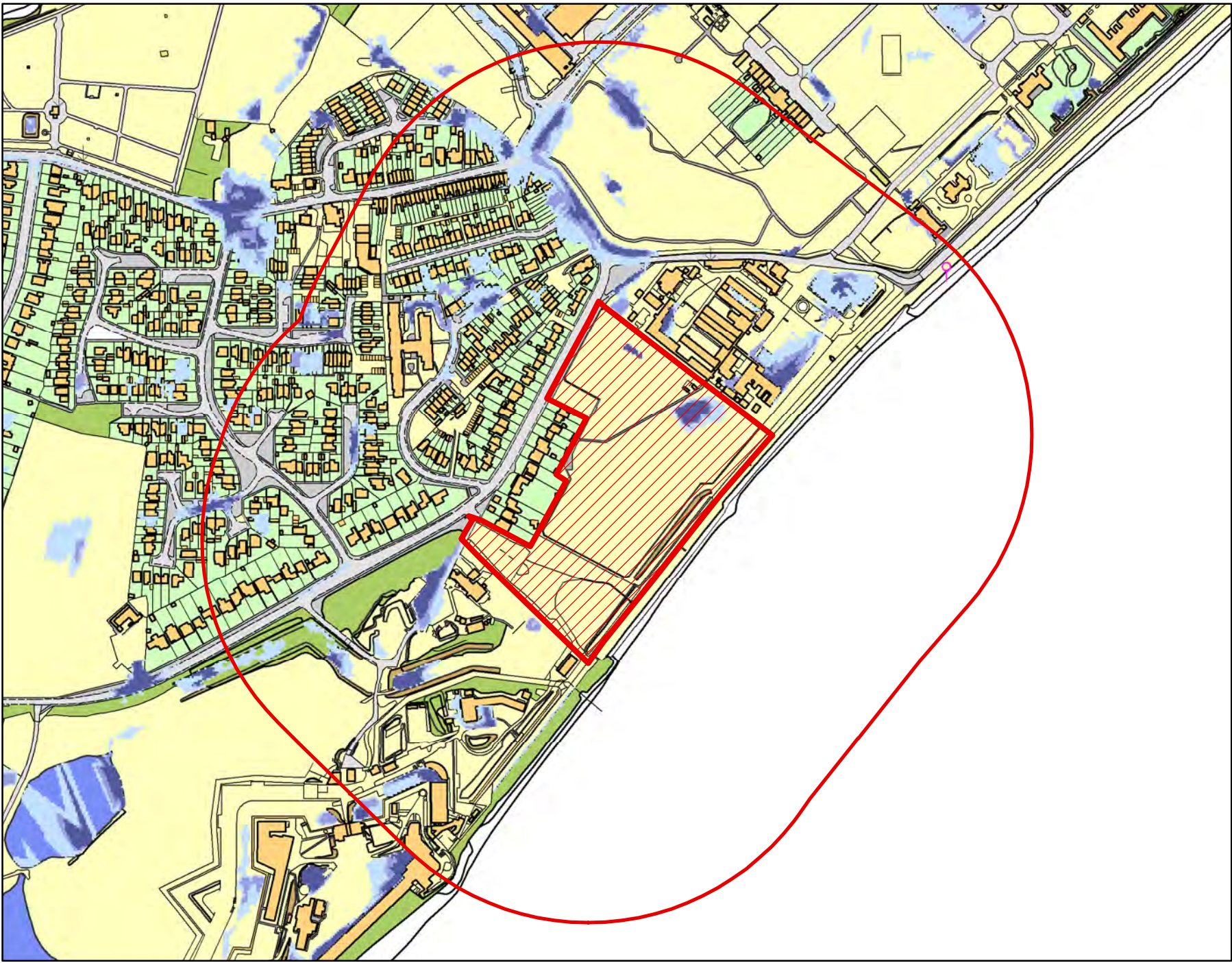


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Date:	24/12/2025	Sheet:	1 of 1
Revision:	1	Initials:	PDB





Legend

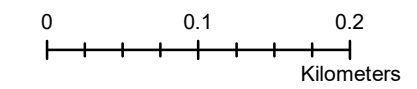
- 250m buffer
- Site
- Flood Maps for Surface Water (High)
- Flood Maps for Surface Water (Medium)
- Flood Maps for Surface Water (Low)

**Surface Water
Management Pre-app
Request**

Flood Map for Surface Water

Haslar IRC

Notes:

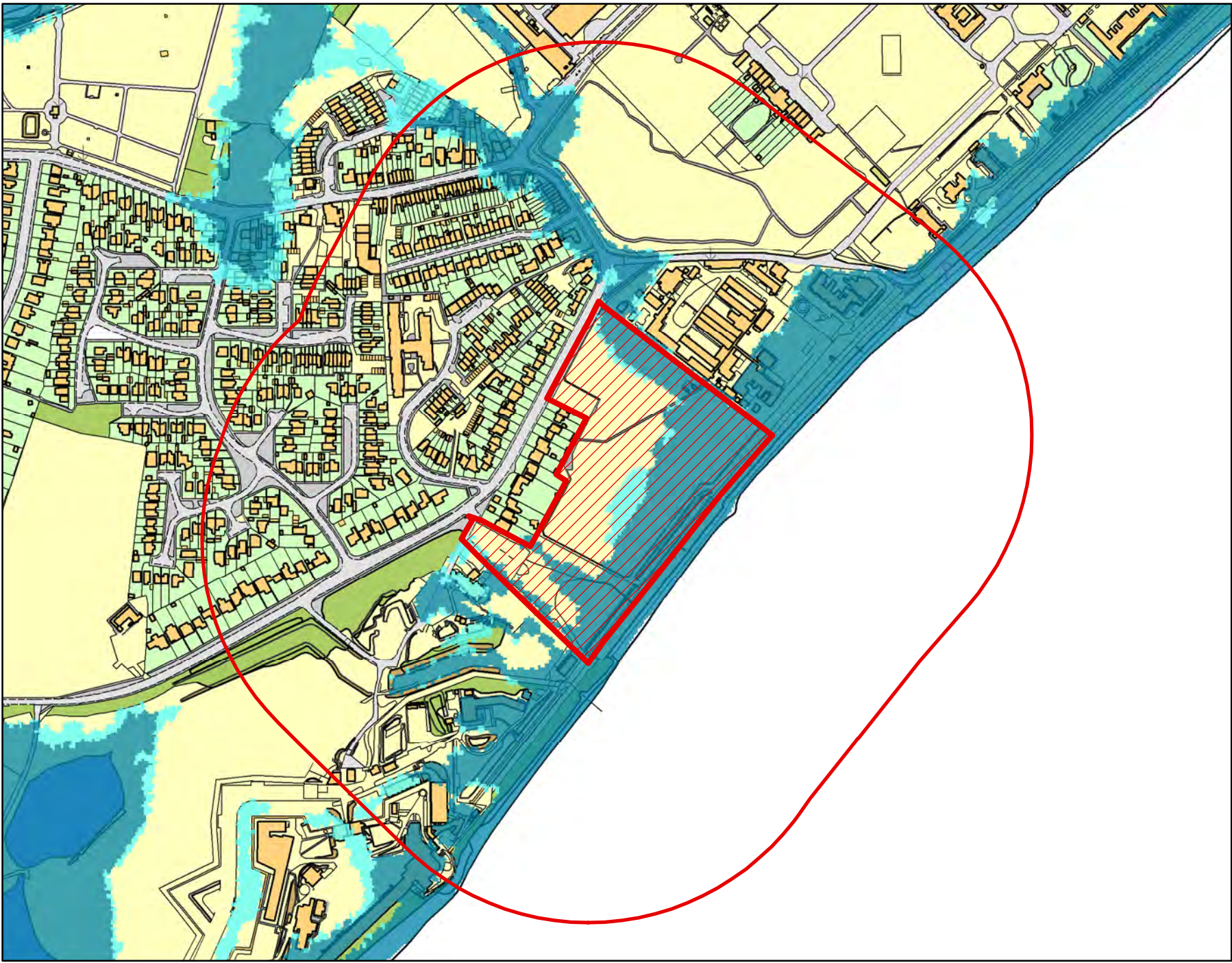


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Date:	24/12/2025	Sheet:	1 of 1
Revision:	1	Initials:	PDB





Legend

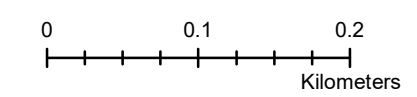
-  Site
-  250m Buffer
-  Flood Zone 3
-  Flood Zone 2

**Surface Water
Management Pre-app
Request**

**EA Flood Zones and Detailed
River Network**

Haslar IRC

Notes:



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Revision:	1	Initials:	PDB





Hampshire
County Council

Universal Services
The Castle
Winchester, Hampshire SO23 8UL

Telephone 0300 555 1375
Fax 01962 847055
www.hants.gov.uk

[REDACTED]
Stantec UK Ltd.

Enquiries to

[REDACTED]

My reference

6/3/11/

Direct Line

Your reference

Date

18th March 2026

Email

[REDACTED]

For attention of Phil Brady

Re: Pre-Application No. P.103/026/25

PROPOSED PHASE 2 - DEVELOPMENT COMPRISING 4 THREE STOREY AND 2 SINGLE STOREY BUILDINGS TO PROVIDE 470 ADDITIONAL BED SPACES OF DETENTION ACCOMMODATION AND ASSOCIATED FACILITIES (230 SPACES) - Immigration Removal Centre 2 Dolphin Way Gosport Hampshire PO12 2AW

I refer to the pre-application request relating to the above site for a proposed development comprising 4 three storey and 2 single storey buildings to provide 470 additional bed spaces of detention accommodation and associated facilities. The Highway Authority wish to make the following comments.

The development will be of a scale that applicant will need to provide a full Transport Assessment (TA). This will fully assess the transport and highway impact of the proposed development and identify suitable mitigation measures. The TA should set out the baseline traffic and transport conditions, provide trip generation and distribution information and assessment of local junctions using industry standard capacity models where required. The assessment should also review the latest available personal injury accident information for a five-year period and set out suitable mitigation proposals.

A Travel Plan will also need to be submitted, which should set out clear aims and objectives, and an action plan of measures to encourage sustainable transport choices to and from the site. The Travel Plan will need to meet the criteria set out in the Hampshire County Council Guidance: [Travel plans | Transport and roads | Hampshire County Council](#) .

Policy Status

The listed policies should include Hampshire County Council's Local Transport Plan 4 (LTP4) (adopted February 2024) and the Fareham and Gosport Local Transport Strategy (approved on 10 March 2026)

<https://www.hants.gov.uk/aboutthecouncil/haveyoursay/consultations/fareham-and-gosport-transport-strategy> .

Site Location

The site location is to the east of Fort Road and to the south of Dolphin Way, Gosport.

Proposal

The Proposal is for an extension to the Haslar Immigration Removal Centre (IRC) to accommodate an additional 470 residents (referred to as Phase 2) giving a total site capacity of 600 residents. A staff car park will also be provided to the southwest of the site as an extension of the existing Haslar Sea Wall public car park (which is accessed via Military Road).

Commented [NG1]: Is the phase 1 proposal agreed and permitted? Including the temporary car park...

Access

The existing vehicular access via Dolphin Way will be retained for servicing and deliveries. Details of the size, type and volume of vehicles using this access should be provided. Swept-path analysis for the largest vehicles likely to be servicing the site, which is understood to be HGVs, should also be provided to demonstrate that there is adequate space on both Dolphin and Way and within the site for vehicles to enter and leave the site in a forward gear. Given the carriageway is a single lane and the proposals will significantly increase movements to and from the site, details of how conflicting traffic will be managed to avoid vehicles stopping unexpectedly, or having to reverse onto, Fort Road should be provided. Consideration should also be given to the impact of these movements on the safety of pedestrians using the King Charles III England Coast Path that runs along Dolphin Way.

It is stated that the majority of staff will access the site via the proposed extension of the current Haslar Sea Wall car park, accessed from Military Road and that an existing gated / dropped kerb access onto Fort Road will be retained for the purpose of "blue light" access and upgraded as part of the development. It should be noted that any improvements to the adopted highway would be subject to the relevant checks and licences with Hampshire County Council and further details will need to be provided within the TA.

Sustainable Access

It is recognised that due to the nature and security requirements of the employment, and the timings of the shift patterns (7am and 7pm changeovers) there may be limited take up of sustainable methods of travel to work amongst staff. It is stated that a Travel Plan will be developed to encourage use where possible. Details of the pedestrian / cyclist accesses should be provided for both phases of the scheme.

It is stated that the IRC will provide a shuttle bus service for visitors to / from local train and bus stations. Further information needs to be provided on the likely quantum of daily visitors to the site and whether this will extend to pick ups from the ferry terminal. Justification should be provided regarding why this cannot be used for staff trips.

Walking and Cycling:

There are footways on both sides of Fort Road in the immediate vicinity of the site and National Cycle Network (NCN) Route 2 is approximately 1.5km to the west of the site.

The King Charles III England Coast Path (KCIIIIECP) runs around the south, east and northern boundaries of this site. The path is a National Trail, with the Hampshire sections managed and maintained by HCC Countryside Service.

Any potential impact of the works on the KCIIIIECP should be suitably addressed by the applicant, with measures proposed to protect the public's continuous access to, and safety on, the footpath.

The proposed re-routing of the section that currently runs through the Haslar Sea Wall car park would require a variation to change the legal route that would need to be approved by the Secretary of State. Natural England can submit a report to the Secretary of State recommending a change to the KCIIIIECP (in consultation with Hampshire County Council) as set out in the document below:

<https://www.gov.uk/guidance/manage-your-land-on-the-england-coast-path>

Public Transport

There are improvements planned to bus services in the area as part of the Fareham and Gosport Local Transport Strategy and Gosport Borough Council's Local Plan, however the current service timings will be of limited benefit to staff despite the proximity of route 11 to the site.

Travel via ferry to the site is possible, particularly if cycling. The terminal is just over 2km to the north of the site and operates every 15 minutes between 05:30 and 00:00. This needs to be included within the TA, including consideration of the walking route.

Fareham train station is the closest station, approximately 12.9km (8.1 miles) to the north of the site.

Parking

An extension of the Haslar Sea Wall car park is proposed to provide 259 bays, which will include 13 active electric vehicle charging bays and a further 54 passive bays. Whilst it is for Gosport Borough Council to comment on the suitability of the provision, a parking strategy should be submitted as part of the TA and should include the proposed formalisation of the parking on Dolphin Way.

Hampshire County Council receive regular complaints from local residents about parking issues along Fort Road and Clayhall Road, particularly in the vicinity of the junction between Fort Road and Dolphin Way. With the additional movements and staffing being generated at the site and the potential for overspill parking from the car park / IRC staff choosing to park on-road closer to the premises, a contribution towards a TRO for parking restrictions in this area, should they be required, is considered appropriate. The current TRO fee is £12k, rising to £12,312.00 next financial year.

Personal Injury Collisions (PIC)

The latest available Personal Injury Collision (PIC) data for a 5-year period will need to be obtained from Hampshire Constabulary and should include data within 50 meters of the site / car park entrances on Ferry Road and Dolphin Way.

Highway Assessment

Further details regarding the methodology for the trip generation, distribution and modal share will need to be provided before a full assessment can be made. Due to shift patterns, the forecast trips occur in the peak periods are limited; however, it seems unrealistic that zero trips would occur in peak times as servicing will occur and it is likely some 'office' staff will work more traditional hours. Furthermore, the LHA require additional surety that shift patterns will be (and remain) as stated given the forecast additional movements are significant.

Please note that any comments made should not be taken as final and may change when further details are provided at the planning stage.

I trust the above is helpful, should you wish to discuss further please contact Philippa Gordon.

Yours faithfully,

Philippa Gordon

Highways Development Planning

Universal Services, Hampshire County Council

Appendix H: NHS England

From: [REDACTED]
Sent: 09 January 2026 09:28
To: [REDACTED]
Subject: Re: Engagement on A&E Planning in the Local Area

Do you trust this email? This email originated from outside the Home Office, or came from a Home Office system that has not been certified. Please exercise caution before opening attachments or clicking on links within this email or any suspicious email, particularly from unknown senders.

Hi Louise and Happy New Year!

I'm very well thank you and hope you are too.

I have nothing to contribute to the current Phase 2 planning. The workshop with Dr PA, the healthcare providers and Medical Architecture would lead any comments from NHSE. It may be good to organise that asap to understand their thoughts.

Kind regards
Wisa

[REDACTED]
Senior Commissioning Manager Health & Justice SE
NHS England – South East Region
Mobile: [REDACTED]
Email: [REDACTED] Website: www.england.nhs.uk
Address: Premier House, 60 Caversham Road, Reading RG1 7EB

[REDACTED]
[REDACTED]
NHS England
Premier House,
60 Caversham Road,
Reading, RG1 7EB

ICB colleagues

20 January 2026

Dear Colleagues

Subject: Reopening of Haslar Immigration Removal Centre (IRC) – Healthcare Service Provision and Local Impact

I am writing to outline expectations regarding the reopening of Haslar IRC and its anticipated impact on local healthcare services.

The Home Office is redeveloping the former Haslar IRC in Gosport in two phases:

Phase 1

Refurbishment of existing buildings, scheduled to open in late 2027, with capacity for 130 adult male residents.

Phase 2

Construction of new accommodation, expanding capacity to 600 residents. Timelines for this phase remain unconfirmed.

Residents will be detained under immigration powers and will not access the local community or services. A permanent modular healthcare facility will be installed during Phase 1. Healthcare services within the IRC will be commissioned by NHSE South East Health and Justice, ensuring provision equivalent to NHS standards. Services will include reception screening and comprehensive primary care, covering mental health, substance misuse, and dental care.

To illustrate the potential impact on local secondary care services, Gatwick IRC provides a useful comparison. With an operational capacity of 620, Gatwick has averaged 16 outpatient appointments and 8 emergency call-outs per month since 2022. The highest monthly average for emergency call-outs was 14 in 2023–24, compared with 8 in 2024–25.

Please contact [REDACTED] if you have any questions about the healthcare provision, further information is available in the published factsheet: Haslar Immigration Removal Centre (IRC): Factsheet – GOV.UK.

Yours sincerely,

[REDACTED]

[REDACTED]

NHS England

NHS England



Appendix I: Gosport Borough Council Pre-Application

Development Management

Home Office

[REDACTED]
Cushman & Wakefield
1 Colmore Square
Birmingham
B4 6AJ

Planning and Regeneration
Gosport Borough Council
Town Hall
High Street
Gosport
Hampshire
PO12 1EB

Phone: 023 9254 5645

Email: planning@gosport.gov.uk

Dear Sir/Madam

Pre-Application No. P.103/026/25

PROPOSED PHASE 2 DEVELOPMENT COMPRISING 4 THREE STOREY AND 2 SINGLE STOREY BUILDINGS TO PROVIDE 470 ADDITIONAL BED SPACES OF DETENTION ACCOMMODATION AND ASSOCIATED FACILITIES INCLUDING 230 SPACE CAR PARK

Immigration Removal Centre 2 Dolphin Way Gosport Hampshire PO12 2AW

I write further to your recent pre-application enquiry regarding the above proposal.

Your proposal has been considered in the context of the surrounding development and site characteristics, the following policies. A summary of consultation responses is been provided as an appendix to this response.

Policies

Gosport Borough Local Plan 2011 - 2029

- LP3 Spatial Strategy
- LP6 Haslar Peninsula
- LP10 Design
- LP11 Designated Heritage Assets including Listed Buildings, Scheduled Ancient Monuments and Registered Historic Parks & Gardens
- LP12 Designated Heritage Assets: Conservation Areas
- LP17 Skills
- LP22 Accessibility to New Development
- LP23 Layout of Sites and Parking
- LP37 Access to the Coast and Countryside
- LP23 Layout of Sites and Parking
- LP39 Water Resources
- LP42 International and Nationally Important Habitats
- LP44 Protecting Species and Other Features of Nature Conservation Importance

Gosport Borough Council is committed to equal opportunities for all.

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

LP45 Flood Risk and Coastal Erosion
LP46 Pollution Control
LP47 Contamination and Unstable Land

Supplementary Planning Documents

Gosport Borough Council Design Guidance: Supplementary Planning Document: February 2014

Gosport Borough Council Parking: Supplementary Planning Document: February 2014

Gosport Borough Council Policy Guidance Note: Securing Employment and Training Measures through planning obligations April 2012

National Planning Policy Framework (NPPF), December 2024

Comment

Please note that references to the National Planning Policy Framework (NPPF) is the version published in December 2024, and references to the Planning Practice Guidance (PPG) website based resource accessed in October 2025. References to the Local Plan are the adopted Gosport Borough Local Plan 2011-2029 (GBLP) unless otherwise stated.

General Principles

The site is within the urban area boundary as shown on the adopted Gosport Borough Local Plan 2011 - 2029 Policies Map and policy **LP3: Spatial Strategy** will apply. **Policy LP3 (2)** states that:

‘Development proposals will be permitted within the urban area (as defined on the Policies Map) provided that it accords with Policy LP10: Design and the other policies in the Local Plan.

Accordingly the proposals would be acceptable in principle provided it is in accordance with the other policies of the adopted Local Plan. The regeneration of urban sites is a key priority for the Council as is supporting local employment opportunities.

Design and Heritage

The site is adjacent to the Haslar Barracks Conservation Area (CA). The CA is supported by the Haslar Barracks Conservation Area Appraisal (March 2018).

National Planning Policy Framework – Achieving well-designed places

Paragraph 131 of the NPPF sets out:

The creation of high quality, beautiful and sustainable buildings and places is fundamental to what the planning and development process should achieve. Good design is a key aspect of sustainable development, creates better places in which to live and work and helps make development acceptable to communities. Being clear about design expectations, and how these will be tested, is essential for achieving this. So too is effective engagement between applicants, communities, local planning authorities and other interests throughout the process.

Paragraph 135 states that planning decisions should ensure that development meets a number of design criteria including:

- a) will function well and add to the overall quality of the area, not just for the short term but over the lifetime of the development;
- b) are visually attractive as a result of good architecture, layout and appropriate and effective landscaping;
- c) are sympathetic to local character and history, including the surrounding built environment and landscape setting, while not preventing or discouraging appropriate innovation or change (such as increased densities); and
- f) create places that are safe, inclusive and accessible and which promote health and well-being, with a high standard of amenity for existing and future users; and where crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion and resilience.

Paragraph 137 recognises the importance of the quality of design:

Design quality should be considered throughout the evolution and assessment of individual proposals. Early discussion between applicants, the local planning authority and local community about the design and style of emerging schemes is important for clarifying expectations and reconciling local and commercial interests. Applicants should, where applicable, provide sufficient information to demonstrate how their proposals will meet the design expectations set out in local and national policy, and should work closely with those affected by their proposals to evolve designs that take account of the views of the community. Applications that can demonstrate early, proactive and effective engagement with the community should be looked on more favourably than those that cannot.

In terms of heritage, the NPPF is clear that design which fails to improve the character and quality of an area should be refused. It is important that new development promotes character in the townscape and landscape by responding to and reinforcing locally distinctive patterns of development, landscape and culture. This includes the Borough's maritime and military heritage associated with its waterfront location on Portsmouth Harbour and the Solent.

The NPPF, paragraph 207 clearly states that LPAs should *'require an applicant to describe the significance of any heritage affected including any contribution made by their setting.'* (Paragraph 207, NPPF). The development proposal is immediately adjacent to the CA and therefore is likely to have an impact on the setting of that CA.

Paragraph 210 (c) of the NPPF states that in determining planning applications, LPAs should take account of *'the desirability of new development making a positive contribution to local character and distinctiveness.'*

Gosport Borough Local Plan 2011-2029

Policies **LP3: Spatial Strategy** in particular **point (8)**, **LP10: Design** and **LP11: Designated Heritage** assets of the adopted GBLP will apply.

Policy LP3 (8) states that:

'Development proposals which affect heritage assets will need to conserve, and where possible enhance, them in a manner appropriate to their significance.'

The Council will seek to ensure that its rich historic environment is preserved and where possible enhanced in order to contribute to the Borough's local distinctiveness. Paragraph 6.37 of the justification text sets out that:

'When considering the impact of a proposed development on the significance of a heritage asset great weight should be given to the asset's conservation. The more important the asset, the greater the weight should be. Significance can be harmed or lost through the alteration or destruction of the heritage asset or development within its setting. Policy LP3 and other policies of the Local Plan have included an assessment of the significance of heritage assets in the Borough, including their setting, using available evidence as set out in Section 8. Further details are set out in Policies LP11-13 relating specifically to heritage assets.'

Point 1 of policy **LP10: Design** sets out an overall policy approach in relation to design as follows:

- a) planning permission will be refused for development of poor design that fails to take the opportunities available for improving the character and quality of an area and the way it functions;*
- b) new development should be well-designed to respect the character of the Borough's distinctive built and natural environment including its heritage assets and their setting;*
- c) historic assets should be conserved and where possible enhanced in a manner appropriate to their significance;*
- d) proposals for development must be based on sound supporting evidence.*

Points 2 – (a) – (p) sets out further detailed criteria applied to development proposals.

It is important that new design should promote the character in the townscape and landscape by responding to and reinforcing locally distinctive patterns of development, landscape and culture. This includes the Borough's maritime and military heritage associated with its waterfront location on Portsmouth Harbour and the Solent.

A Design and Access Statement (DAS) should be prepared and set out how the development proposal address each of the criteria set out in policy LP10. The DAS should explain how the proposed development relates to the surrounding area including the Haslar Barracks Conservation Area in both design and access terms.

A key priority of the design of new development proposals is to conserve and enhance the Borough's heritage assets. Where development proposals could affect historic assets it will be necessary to produce a Heritage Statement and this document should set out the impact of the development proposal on the historic asset(s) and currently unidentified heritage assets such as archaeology.

The content of the Heritage Statement may vary depending on the significance of the heritage asset and the impact of the development. The explanation text accompanying policy LP10 provides some general guidance on what it should contain and advice may be sought from the Council's Conservation and Design Team.

Policy LP 10 point (2) addresses development form and sets out criteria to guide the design parameters for new development these include:

- Consider the site's landform and character;*
- Ensure new development is integrated into the Borough's urban and landscape setting which reduces its impact on the natural environment and reinforces local distinctiveness;*
- Ensure the scale, massing and height of proposed development is considered in relation to adjoining buildings, the topography, the general patterns of heights in the area and views, vistas and landmarks.*

The new development should also be designed to take into account adaptability to climate change and use sustainable construction techniques and materials wherever possible in accordance with **policy LP10 point 2 (l) – (m)** and **policy LP38: Energy Efficiency** and the NPPF: Planning for Climate Change paragraphs 162 – 169.

The comments of the County Archaeologist have been noted particularly with regards to the accompanying Heritage Statement and Archaeological Assessment and the need to undertake further investigative studies. It is noted that part of the Scheduled Monument appears to be within the pre-application boundary and policy LP11: Designated Heritage Assets including Listed Buildings, Scheduled Ancient Monuments and Registered Historic Parks and Gardens **point 2** states:

'When considering an application that would affect a designated heritage asset, an applicant will be required to describe the significance of the asset with a proportionate level of detail relating to the likely impact a proposal could have on the asset's historic, architectural and archaeological interest.'

Development proposals need to be appropriately informed with background research required proportionate to the significance of the asset or site. The developer will be required to describe the significance of any heritage asset affected including any contribution made by its setting. The decision making process is informed by: the historic context of a site; its sense of space; its special architectural or historic interest as part of a group or in isolation; and its archaeological interest. In this case the impact on the CA including its setting and on the heritage assets needs to be considered.

In many cases, the historic significance of an asset may not be entirely obvious due to a lack of readily available information. The asset may have developed over hundreds of years and elements of earlier phases may exist within the external structure or below ground level.

Policy LP11 (point 4) relates to: *Planning permission will be granted for proposals that make a positive contribution to, or better reveal the significance of the setting of a designated heritage asset.*

The setting of an historic asset often forms an important part of the character of a historic structure including landscaped grounds, the walls and outbuildings, the historic plan form of a military complex or a broader layout of an historic settlement. New development will need to pay particular attention to its impact on a setting and justify how it conserves and enhances the setting.

It should be noted that should additional investigation reveals further evidence relating to undesignated heritage assets are of national significance points 1 – 4 of policy LP11 will apply.

Careful consideration will need to be given to the proposed scale, setting, layout, massing landscaping and appearance including details and materials of new buildings on the CA and the Scheduled Monument.

The draft HIA provided more recently has been reviewed. The document acknowledges the assessment was made without the benefit of plans or elevations of the proposed and therefore it is questioned how a valid assessment can be made in their absence. This is reinforced by the seemingly illogical findings therein and specifically at 7.1.5, with the conclusion that:

'The proposed development has incorporating recommendations from Historic England and

embedded mitigation measures which will result in the proposed development remaining distinct but complementary to the Conservation Area and contribute to a coherent townscape. This assessment has found that the 20 m wide landscaped buffer between the proposed accommodation blocks and the Conservation Area would sufficiently visually separate the two elements of the IRC site and result in the proposed development not appearing overbearing...'

It would be very helpful for us to be provided with any advice received from Historic England, as reference is made within the HIA at several points to their response, which apparently shares our concerns regarding the utilitarian design of the buildings and their potential to have an overbearing relationship with and harmful effect on the Haslar Barracks Conservation Area.

With the benefit of making an assessment with site of the relevant plans, the elevations and site plan clearly show a group of large buildings of a design lacking in architectural merit and of a size and proximity that would cause harm to the adjacent Conservation Area. The location of four no. three storey blocks 12m in height, two of which are within 20m of the low slung, predominantly single storey historic barrack buildings is considered overbearing and harmful to the setting of the Conservation Area.

Attention is drawn to the Haslar Barracks CA Appraisal, p.22:

'The broader setting of the Conservation Area: The surrounding land.

'... The western boundary to the site should retain a landscaped strip of land between the existing buildings and any future development to its south-west: possibly with consideration given to tree planting and a footpath link to the waterfront to ensure a degree of separation.

Any development would need to have regard to the context of the Barracks site to ensure it would not be overbearing in form or harm its setting.'

We would recommend that the HIA be revisited as suggested at 7.1.6 with regard to the plans and elevations proposed to reassess the conclusions therein. The conclusion that there is no harm to the significance of the Conservation Area and to further state that the relationship is 'complementary' seems perverse.

Based on the information presented we consider that the development would be likely to cause harm to the setting of the Conservation Area such that substantial public benefits would need to be demonstrated to offset this.

Flood risk and coastal erosion

A Flood Risk Assessment and Coastal Modelling Report have been prepared as part of this pre-application consultation.

It is noted on page 6 of the FRA report – Regional and Local Policy that: 'It should be noted that Haslar IRC is allocated for development in the draft Gosport Borough.' The Council confirms this will not be the case for the emerging Regulation 19 Local Plan as the site promoter's agents Savills acting on behalf of the Ministry of Justice withdrew the site in a letter to the Council dated 29th July 2022.

The land-use proposed in this location is for a more vulnerable use and development proposals should not increase flood risk elsewhere. See the detailed comments made by Coastal Partners who are the Council's specialists for flood risk and coastal erosion issues along the Gosport coastline.

Whilst it is likely the main source of flooding is tidal it is noted that the **Flood Map for planning**

shows areas at potential risk of flooding from surface water from a 1:30, 1:100 and a 1:1000 risk.

Policy LP45: Flood risk and coastal erosion will apply in this case and the Council will expect development proposals in areas of flood risk to demonstrate that they are necessary and can be made safe from all forms of flooding both now and over their design life without increasing the risk of flooding elsewhere.

Sequential Test

The NPPF requires a sequential risk-based approach to be undertaken regarding planning applications in areas at risk from any form of flooding both now and in the future (paragraph 173) therefore a FRA will need to set out how the site meets the sequential test.

Exception Test

It will be necessary to apply the Exception Test. The applicant through its FRA will need to clearly and robustly demonstrate how both parts of the Exception Test can be met. The criteria for the Exception Test is set out below:

- a. the development would provide wider sustainability benefits to the community that outweigh the flood risk; and
- b. the development will be safe for its lifetime taking account of the vulnerability of its users, without increasing flood risk elsewhere, and, where possible, will reduce flood risk overall.

Both parts of the test should be satisfied before granting planning permission.

The Partnership for South Hampshire (PfSH) commissioned a sub-regional wide SFRA which was published in 2023/24. The Environment Agency formed part of the Steering Group for this project and agreed the modelling outputs with PfSH's consultants.

Whilst the site promoter withdrew the IRC from the Local Plan process after the Council's Regulation 18 public consultation in 2021, the site forms part of the wider Haslar Peninsula and was therefore included in the PfSH SFRA Level 2 work and **it is recommended that the PfSH SFRA Level 1 and Level 2 reports and mapping and technical notes are used as a starting point for the site-specific FRA and can be found at: <https://www.gosport.gov.uk/article/1299/Strategic-Flood-Risk-Assessment>**

Modelling

The Coastal Partners have provided some helpful detailed comments in relation to the coastal modelling outputs, it is recommended the applicant takes on board their advice. The Council also strongly recommends the applicant consults the Environment Agency including the EA's national flood modelling team regarding the modelled scenarios. Details relating to this engagement could be included in the final FRA and would serve to give the decision maker confidence that flood risk is fully understood and accounted for and to ensure greater confidence in informing any proposed mitigation measures. The applicant's flood modellers will also need to consider the work undertaken in the PfSH SFRA (2024) as this work updates the East Solent Coastal Model using the current CCA's and provides a new tidal boundary to 2122. The PfSH SFRA is available on the Council's Local Plan evidence page under Flood Risk and Coastal Erosion at: <https://www.gosport.gov.uk/gb1p2040evidence> It is noted that in Table 2.4: Peak Tidal Levels used in the model (mAOD) that the 200-Year + Higher Central Allowance and the 200-Year + Upper End Allowance use an allowance for 2115. In order to ensure consistency and avoid confusion with the PfSH work which is the most up to date available information for future climate change whether this should be extended to include 2125 i.e. to cover the design life of the development of a 100 years?

In addition to using the Upper End (95th percentile) allowance from UKCP18 RCP 8.5 to test the sensitivity for flood risk and proposed mitigation. Given the location of the development proposal on the open Solent coast and the critical infrastructure of the existing defence asset i.e. the sea wall, the flood risk consultant may wish to consider extending this sensitivity testing to include further sensitivity testing using a H++ scenario. Further advice can be provided by the Environment Agency on this point and further guidance can be found at: <https://www.gov.uk/guidance/flood-and-coastal-risk-projects-schemes-and-strategies-climate-change-allowances#sea-level-allowances>

It will be necessary to ensure both the residential accommodation and critical infrastructure such as access and egress to and from, and within the site are protected from flooding along with other key infrastructure elements such as drainage, utilities, physical buildings such as the proposed energy centre and the medical centre. The PfSH SFRA Level 2 report (Section 4) for example identifies a number of potential measures for the Haslar Peninsula that may assist as starting point for the FRA work for the planning application.

Flood Emergency Management Plan

The information submitted contains a Flood Emergency Management Plan (FEMP). It is important to note the finished Floor Level Mitigation for any proposed sleeping accommodation should be 0.9m (900mm) above the existing ground levels at the northern extent of the building, which may accord with the recommendations in the Environment Agency's Flood risk assessment: standing advice for flood risk. I note this can be achieved by land raising for ground floor sleeping accommodation or without land-raising by using the ground floor rooms for non-sleeping accommodation.

Careful consideration will need to be given to the potential visual impacts of land raising if this is the preferred mitigation option due to the site being adjacent to the Haslar Barracks Conservation Area and the potential impact on the setting of the Conservation Area. The Council's Conservation and Design Officer will be able to provide further advice in relation to heritage assets.

Whilst it is recognised that in an extreme flood event the site may need to be evacuated, the IRC will be a secure facility and whilst this may be achievable in the event of a planned flood event through the flood warning service it is considered more detail is needed in order to understand how this would be managed in the event of a significant breach of the flood defence, particularly given the secure nature of the site and the additional measures required for the extra-secure unit within the site which in-effect accommodates prisoners.

The FEMP states that: 'The nature of a breach in the defences would result in the rapid inundation of the site at short notice. Hence, the recommended actions to be carried out in the event of a breach in the defences will likely be coordinated by site staff.' This seems to be contradicted by: 'A breach is likely to occur during a flood event up to a 1 in 200-year event with elevated tidal water being held back by the defence. Therefore, it is likely that a level of Flood Warning will have been issued prior to the event by the Environment Agency.'

It is noted on page 6 of the FEMP that the main egress route for both the current and the proposed route from the site is located in Flood Zone 1 but where Dolphin Way joins Clayhall Road/Fort Road this area is shown as being in Flood Zone 3. The FEMP on page 6 also acknowledges that whilst some of the site is a dry island and refuge can be sought on the higher floors of the buildings, the FMEP acknowledges that emergency services may be unable to access the site and the site would therefore need to be evacuated in an extreme flooding

event.

The views of both the Environment Agency and the Council's Emergency Planning Officer will be important considerations. It is recommended that the advice of both are sought as to the satisfactory nature of these proposed arrangements.

Surface water drainage and SUDS

Policy LP45 parts 4 and 5 seek to ensure that all new development must ensure there will be no net increase in surface water run-off and new development proposals will need to include SuDS as part of the management of surface water on the site. Since policy LP45 was adopted the Government's National standards for SuDS [National standards for sustainable drainage systems \(SuDS\) - GOV.UK](#) have been published and therefore any SuDS scheme on the site will also need to accord with these standards.

The details relating to the ownership, lifetime maintenance and management of the SuDS need to be clearly set out.

The FRA will need to address any potential for flooding from sewers through a serious flood event and mitigation will need to consider appropriate flood resistance and resilience measures for both buildings and sewerage infrastructure.

A drainage strategy should accompany the FRA to support a planning application. It is recommended that both Southern Water and Hampshire County Council as the Lead Local Flood Authority are consulted in this process. The LLFA generally expect to see a minimum reduction on existing brownfield run-off rates of circa 50%.

Maintenance of flood risk management measures

In accordance with policy LP45 point 7, development proposals should ensure that land will be safeguarded from development in order to ensure that current and future flood risk management measures can be maintained and/or replaced over the lifetime of the development. The NCERM 2 mapping shows the site as being potentially at risk from coastal erosion by 2055 and therefore this potential erosion risk should be considered in the FRA and any proposed mitigation coming forward. The FRA should be accompanied by a Flood Protection Strategy (FPS) which should be prepared in order for the determining authority to be able to understand who owns the existing defences (i.e. the sea wall) and who will be responsible for its continued maintenance.

It would also be helpful if this strategy could include asset inspection information, (for example as shown in the Sea Wall and Promenade drawing sheets 4 and 5 of the Coastal Modelling Report) and an indicative phasing schedule for current and future works, details of the works likely to be required in the future and how these will be funded both now and over the lifetime of the development.

Further information on what matters can be included in a can be found at: [Flood risk asset maintenance and inspection: good practice guidance - GOV.UK](#)

Nature conservation

Proposals will need to accord with the NPPF and **policy LP42: Internationally and Nationally Important Habitats** regarding the need to protect the integrity of internationally important

habitat including suitable mitigation to address Brent Geese which are a protected species.

The existing sports field within the site has been identified as a 'Primary Site' in the current Solent Waders and Brent Goose Strategy and therefore suitable mitigation will be required. It is understood that the developers have been in discussions with a landowner that is offering mitigation solutions on land in the Stubbington area. Further details are required.

It is recommended that the applicant seeks the advice of Natural England regarding further mitigation measures that may be required as part of this pre-application process.

An ecological survey has been submitted however it is noted that dates of the field surveys in section 3.2, pages 7 – 8 are quite old now having been carried out in 2022 and 2023, and may require updating. It is noted that Hampshire County Council Ecology have made similar points regarding the need to update the EIA.

A recent ecological survey has been carried out on Borough Council land off Fort Road currently used primarily as car park which is incorporated within the red line boundary of this development. It is considered that this survey work produced by Hampshire County Council should be considered in any ecological assessment for this development proposal.

The development proposals will also need to demonstrate how securing a minimum of 10% of biodiversity net gain will be achieved.

Nutrient Neutrality

In accordance with Policy LP39: Water Resources, proposals are required to not have an adverse impact upon surface, ground or coastal water, in accordance with The Water Environment Regulations and the Habitat Regulations. Since 2022 this has included the requirement for residential developments to be 'nutrient neutral'. It is incumbent upon the applicant to demonstrate how, via on and/or off-site mitigation measures, their proposal would achieve nutrient neutrality using the latest version of the Solent Nutrient Neutrality Calculator, which can be found at: <https://www.gosport.gov.uk/article/1888/Nutrient-Neutrality>

In this instance a bespoke calculation will be required, inputting the expected number of occupants and using a precautionary occupancy rate of 100%, unless it can be robustly demonstrated otherwise. Any land use changes will also need to be inputted into the Calculator. Should mitigation be required, a list of potential mitigation providers can be found on the Council's Nutrient Neutrality webpage.

Sustainable Drainage Systems

In accordance with the National Standards for SuDS, the proposed SuDS scheme shall: *'consider whether there are any local opportunities to support improvements to receiving or nearby groundwater, surface water or the delivery of objectives in affected catchments where reasonable and practical to do so, and proportional to the scale of development.'* (Source: Standard 4: Water quality National Standards for SuDs)

Development should not be permitted unless practical and effective measures are taken to treat, contain or control any contaminants in order to avoid pollution to groundwater or discharging into Portsmouth Harbour of The Solent in accordance with policy **LP47: Contaminated Land and Unstable Land criteria 2 (c)**.

Open space

It would be useful to have an understanding if the proposed provision is sufficient and provides suitable amenity for the needs of the occupants of the IRC facility. The submitted supporting information only shows this area as green space, is the applicant proposing to include any recreational facilities such as sports pitches or a MUGA? It is important to consider the health and well-being needs of those who will be living at the facility, open space and recreation can play an important role here and therefore the applicant may wish to consult Public Health Hampshire on this matter.

With regards to the King Charles III England Coast Path, the route runs through to the proposed car park, it is considered necessary to improve the accessibility along the path to create a more pleasant walking experience. From the plans submitted with this pre-application consultation the route of the coastal path appears to be constrained and squashed against the security fencing between the proposed car park and the Gosport and Stokes Bay Golf Course, located to the south-west of the site boundary. The Council therefore considers it is important for the applicant to consult with Natural England regarding the arrangements of access on the King Charles III England Coast Path and to explore potential improvements to the current access arrangements to the Coast Path.

It is noted from drawing number 323319-15207-ATR-000-GF-DR-A-0250-S4-DO100 (Rev.PO4): Proposed Development Site Plan- Phase 2a, that a community garden is proposed, whilst this is welcomed in principle, the proposed fence line arrangements feel confusing if it is to be a public accessible garden then is the fencing (as shown in green) along Fort Road required? The site may be more suited for residential development along the frontage of Fort Road unless the developer wishes to retain the open space pending a decision for further development associated with the IRC function.

Health

Suitable health infrastructure provision is a key planning consideration under the NPPF. It is understood that a health facility will be provided as part of phase 1 to serve the facility. The applicant may wish to consult the Hampshire and Isle of Wight Integrated Care Board on the development proposal as there may be the potential for pressures on other local medical resources such as dentistry and hospital facilities such as Gosport War Memorial or the Queen Alexandra Hospital at Portsmouth arising from the development.

Parking and access

In accordance with the **NPPF (December 2024)**:

'All developments that will generate significant amounts of movement should be required to provide a travel plan, and the application should be supported by a vision-led transport statement or transport assessment so that the likely impacts of the proposal can be assessed and monitored.'

Policy LP22: Accessibility to new development will apply in this case. New development which is likely to generate significant levels of travel demand is sited in locations that are effectively and conveniently served by public transport. Locations that are not currently well served by public transport (i.e. along the Haslar Peninsula) may be acceptable when improvements to public transport are included as part of the overall development scheme or as part of programmed proposals in the Local Transport Plan (and supporting documents) or arising from other funding opportunities. Safe access should be provided for cyclists and

pedestrians and, where practical, priority should be given to pedestrian and cycle movements through the site through the delivery of appropriate measures and this policy approach is reinforced through the objectives and policies of Hampshire County Council's **Local Transport Plan 4 (LTP4)**(adopted February 2024).

LTP4 seeks to deliver the following:

- shift away from planning for vehicles, towards planning for people and places;
- meet national priorities to decarbonise the transport system;
- reduce reliance on private car travel;
- gives people a choice of high quality travel options; and
- support sustainable economic development and regeneration; and promote active lifestyles.

It is considered that the level of development being proposed would require the preparation of a Transport Assessment. A Travel Plan to include measures to assist in the delivery of LPT4 and the adopted Gosport Borough Local Plan 2011-2029 policies should inform this development proposal and accompany the planning application.

It is recommended that Hampshire County Council are consulted as the Highway Authority as part of the planning application process.

LP23: Layout of Sites and Parking. Whilst it is important that there are sufficient car parking spaces provided to serve the site including those for electrical vehicle parking and charging infrastructure.

The following high-level comments and observations are provided Traffic and Transport matters. Please note these do not constitute formal "Highways" comments, which should be sought from Hampshire County Council (HCC) as the Local Highway Authority for the Gosport area.

- The scale of the development would appear to require a Transport Assessment if a full Application is submitted - the scope of which should be discussed / agreed with HCC's Highways Development Planning team.
- The quantum of parking (for cars, bicycles and motorcycles) should be justified in relation to the Standards as set out in the Parking SPD, the scale of the development and any measures to reduce the reliance on the car – however, the present low level of accessibility to the site by public transport should be taken into account. A Travel Plan will be also required and the scope of such should again be discussed / agreed with HCC.
- The parking spaces should conform to the size requirements as set out in the Borough Councils Adopted Parking SPD, paying particular attention to the width of spaces (2.5m wide) / extended width end spaces (2.8m wide).
- Access to the site by any commercial vehicles likely to be visiting / delivering etc. should be detailed, including the size of vehicles likely to be serving the site, where they can park to load / unload, and any on-site turning provisions so they can enter / leave the site in a forward gear (including swept path analysis to demonstrate this).

Skills and Training

The need to improve the skills of the local population is considered one of the most critical issues for the Borough's economy and its residents and therefore it is considered the development proposal should meet the policy tests of policy **LP17: Skills and Training**. There are opportunities to support local skills and training in both the construction phase of the development and operationally this would make a positive contribution towards supporting the local economy.

The Borough Council has produced its own practice guide outlining the process for securing training and employment in relation to major development which relate to local priorities. Key measures the Borough Council seek to include in discussions with developers are as follows:

- Work placement;
- Curriculum Support Activities;
- Career advice;
- Pre-employment training;
- Work trials and Interview guarantees;
- Apprenticeships;
- Vocational training;
- Supervisor training;
- Leadership and management training;
- Health and safety;
- Support with transport, childcare and work-equipment;
- Construction skills certificate scheme; and
- Financial contributions towards relevant training schemes within the area.

Pollution Control

Development can provide important opportunities to restore land which may be contaminated to productive use. Contamination can give rise to hazards which put at risk people working on the site and the occupiers and users of the proposed development. **Policy LP47: Contaminated Land and Unstable Land** will apply in this case. The site is identified on the Council's contaminated land mapping layer as an area where there may be potential for contamination. Therefore, early pre application meetings with the Council and the Environment Agency are advised. The standard of investigations, assessments, including risk assessments, remedial schemes, verification reporting should follow current UK good practices.

The decision-maker will need to be satisfied that unacceptable risk from contamination will be successfully addressed through remediation measures and not cause undue environmental impact either during the construction phase or after the completion of the development has taken place. As a minimum land should not be capable of being determined as contaminated land under Part IIA of the Environmental Protection Act 1990.

With regard to flood risk, the Environment Agency (EA) advise that a significant number of flood risk objections are caused by missing or inadequate flood risk information in planning applications.

Inadequate Flood Risk Assessments (FRAs) can delay Local Planning Authority decision-making and result in inefficient use of both EA and Lead Local Flood Authority resources. The EA has produced guidance so that applicants can increase the chances that their FRA contain the right information first time by completing the template. The guidance and templates can be found at the following link <https://www.planningportal.co.uk/permission/commercial-developments/understanding-and-assessing-flood-risk/your-flood-risk-assessment>

I hope that the above comments will be of use. Please note the above comments should be read in conjunction with the following schedule of consultation responses from third parties. There are a number of consultees with whom we would encourage you seek pre-application advice from (these include but are not limited to the Environment Agency, Historic England, Natural England and the County Council). We would appreciate sight of any pre-application advice received from third parties.

Yours faithfully



Development Manager

Dated: 17th November 2025

Appendix - Haslar IRC Phase 2 pre-app - Consultee responses

Hampshire County Council (HCC) – Flood Water Management (Local Lead Flood Authority)

We are happy to provide pre-application advice however please be aware that this is a chargeable service and can be requested from our website: <https://www.hants.gov.uk/landplanningandenvironment/environment/flooding/planning>

If the applicant does not wish to take advantage of this service, please direct them to our website where additional guidance and a checklist is available identifying our requirements as LLFA.

HCC – Highways

HCC operate a chargeable pre-application service. Details of which can be found at: <https://www.hants.gov.uk/transport/developers/preapplication>

The development will be of a scale that applicant will need to provide a full Transport Assessment. This will fully assess the transport and highway impact of the proposed development, and identify suitable mitigation measures. The TA should set out the baseline traffic and transport conditions, provide trip generation and distribution information and assessment of local junctions using industry standard capacity models. The assessment should also review the latest available personal injury accident information for a five year period and set out suitable mitigation proposals. It is recommended that the withdrawn Department for Transport's Guidance on Transport Assessment is referred to.

A Travel Plan will also need to be submitted, which should set out clear aims and objectives, and an action plan of measures to encourage sustainable transport choices to and from the site. The Travel Plan will need to meet the criteria set out in the Hampshire County Council Guidance on Development-related Travel Plans (2009).

If the applicant wishes to discuss the detailed scope of the Transport Assessment please see the link below providing details of the Highway Authorities Pre-Application Highways Advice service. <https://www.hants.gov.uk/transport/developers/preapplication>

HCC – Ecology

An Ecological Impact Assessment has been submitted in support of this pre-application. This report is required to be updated as there are currently a number of assumptions made in the report. Furthermore, there is reference to 'Low levels of Common Pipistrelle Bat foraging activity'; however, the results of the bat activity survey work (seasonal transect and static surveys) have not been submitted. This information will be required at application stage, to enable a thorough impact assessment and a suitable mitigation strategy (i.e. sensitive lighting strategy). Furthermore, the mitigation strategy to ensure the protection of the reptile population on site is not acceptable. It is simply not acceptable to state 'Allow any individual reptiles to disperse into off-site habitats or relocation by hand.' If the existing reptile population on site cannot be retained, a suitable offsite receptor should be identified. The offsite receptor will require reptile surveys to identify the suitability of the site for reptiles and the size of the existing reptile population to ensure sufficient carrying capacity to introduce an additional population to the area. If the reptile population on site is to be retained on site, the onsite receptor areas should be identified, along with the land use type and management regime of these areas, to ensure the receptor sites will remain suitable for reptiles in the long-term, during the operational phase. It is also likely that due to the large size of the site, a capture and relocation programme

will be required. Non-technical summary section of this report also states “low status Common Pipistrelle Day Roosts identified within Dormitory B building and Multifaith Centre – Natural England licence required and mitigation measures, works to all other buildings to proceed sensitively.” Is this relevant to this application, as it has been stated that there are no buildings present on site?

To mitigate for the loss of Solent Waders and Brent Geese Strategy Core Area 63, an arable field in Stubbington will be sown with perennial ryegrass and will be fenced off. Whilst this is acceptable, to support any future application, the HMMP is required to be updated as the document is currently dated June 2024. Furthermore, more detailed information is required to be added to the document as the information provided in relation to the camera monitoring is not considered detailed enough or sufficient. Creation of scrapes within the grassland should also be added to the document.

It should also be noted that any future application should be able to demonstrate a 10% net gain in biodiversity as no information in relation to BNG has been submitted for review at this stage.

HCC – Rights of Way

The King Charles III England Coast Path (KCIIECP) runs around the south, east and northern boundaries of this site. The path is a National Trail, with the Hampshire sections managed and maintained by HCC Countryside Service.

Should a planning application be submitted in future, any potential impact of the works on the KCIIECP should be suitably addressed by the applicant, with measures proposed to protect the public’s continuous access to, and safety on, the footpath.

HCC – Archaeology

The Archaeological Assessment concludes that the archaeological implications of the development cannot be accurately assessed on the basis of the available evidence (para 6.1.2) and that it is likely that additional archaeological investigation will be required (para 6.2.1) to be agreed with the planning authority and consultees (para 6.2.5).

I do note that part of the adjacent Scheduled Monument (Fort Monckton) lies within the site (para 4.2.2) and that it is recommend that the boundary is amended to avoid impact on the Scheduled Monument (para 6.2.3). I would express that more strongly. The layout and design of the scheme will need to ensure that no part of the Scheduled Monument is impacted. More than that I strongly recommend that the layout and design seek to accommodate the setting of the Scheduled Monument and that in this matter the advice and opinion of Historic England should be sought, to whom I am would defer.

With regard to future archaeological works I would agree that there is some potential to encounter the archaeology relating to the military activity of the site over nearly 200 years (para 6.1.2) and that a programme of mitigation should be put in place to address this (para 6.1.3). I would agree and would advise that such matters might be secured by archaeological conditions attached to any planning permission issued. That is, I do not anticipate that they will be overriding (other than issues arising out of the Scheduled Monument).

However I feel that there are two issues that would do well to be explored further in order to quantify the nature of the archaeological work and the provision of any mitigation strategy. It is

noted that recent land use will have compromised that archaeological potential to some degree, para 4.7.2, for example the levelling of the playing field may well have reduced or removed the archaeological potential of that location. I think it would be wise to better explore the degree to which LiDAR, mapped evidence, GI information and on site review might set out areas of the site where the military archaeology may have been already compromised or removed by subsequent impacts.

I also feel that a better understanding of the archaeological potential arising out of past military activity is articulated. I note in the Heritage Statement that all reasonably accessible avenues of research into the Monckton hutments have been pursued. I recommend that less readily accessible historical sources are sought out and reviewed. These may show: the nature of the archaeology which might be encountered and what its merits may (or may not) be; the degree to which the hutments may not have had much ground penetration (para 3.1.3 heritage statement) and so not left an archaeological record; and, the nature and use of the site which might in time perhaps offer an opportunity to conclude that archaeological study need not be relied upon due to the existence of more instructive historical sources.

In summary, the Scheduled Monument should be avoided and the setting respected; beyond this I don't see archaeological matters as overriding and can be addressed in due course by use of archaeological conditions; that some timely historical research at this stage may allow the archaeological potential to be clarified or indeed overtaken by better historical insights.

Natural England

Natural England is a statutory consultee for planning applications which might affect designated nature conservation sites (Sites of Special Scientific Interest (SSSIs), Special Areas of Conservation (SACs), Special Protection Areas (SPAs) and Ramsar sites), for development affecting significant areas of best and most versatile agricultural land and for development requiring Environmental Impact Assessment. Natural England is not a statutory consultee at the pre-application stage except for NSIP's, and therefore is unable to provide advice free of charge. However, where a development proposal may result in significant environmental impacts or significant opportunities for environmental gain we have introduced a Discretionary Advice Service (DAS) on a cost recovery basis so that we can work with applicants, developers, and consultants to take appropriate account of environmental considerations at an early stage of the process to improve the quality of applications before they are submitted. We believe this could help to save our customers time and money in the long term, whilst also securing good outcomes for the natural environment.

You may wish to recommend our Discretionary Advice Service to the developers/consultants and explain that they are able to contact Natural England directly using this service.

For information, it is the responsibility of the local planning authority (LPA) to decide whether a proposal is 'in or likely to affect a Site of Special Scientific Interest' and if so, to ensure that appropriate consultation with Natural England is carried out. We advise LPAs to make this assessment using Natural England's published set of mapped Impact Risk Zones (IRZs) for SSSI/SAC/SPA and Ramsar sites. These IRZs are available for viewing on www.magic.gov.uk and they may be helpful to you in identifying whether Natural England would need to be consulted on a planning proposal.

Historic England

We no longer provide pre-application advice via local authorities to a third party. We continue

to provide pre-application advice to applicants and would encourage the applicant to contact us directly.

If the applicant contacts us directly we would expect our pre-application engagement to include joint discussions between the local authority, the applicant and us wherever possible. We continue to encourage a collaborative approach to the development of pre-application proposals, including meetings and site visits. We will also, subject to the applicant's agreement, copy our advice to your authority. If you have any questions regarding any of the above, please do contact me.

Further information on all our Pre-Application and Enhanced Advisory Services can be found on our website at: <https://historicengland.org.uk/services-skills/our-planning-services/charter/Our-pre-application-advisory-service/>

Southern Water

Adequate Capacity

There is currently adequate capacity in the local sewerage network to accommodate a foul flow of 2.49 l/s for the above development at manhole reference SZ61984303. Please note that no surface water flows (existing or proposed) can be accommodated within the existing foul sewerage system unless agreed by the Lead Local Flood Authority in consultation with Southern Water, after the hierarchy Part H3 of Building Regulations has been complied with.

Development Site is not within Southern Water's Supply Area

The development site is not located within Southern Water's statutory area for water supply services. Please contact Portsmouth Water who are the relevant statutory undertaker.

Connection to public sewer

Southern Water requires a formal application for a connection to the public sewer to be made by the applicant or developer. To make an application visit Southern Water's Get Connected service: <https://developerservices.southernwater.co.uk> and please read our New Connections Charging Arrangements documents which are available on our website via the following link: <https://www.southernwater.co.uk/developing-building/connection-charging-arrangements>

We request that should this planning application receive planning approval, the following informative is attached to the consent: Construction of the development shall not commence until details of the proposed means of foul sewerage and surface water disposal have been submitted to and approved in writing by the Local Planning Authority in consultation with Southern Water.

Proposed SUDS features

If it is the intention of the developer for Southern Water to adopt the proposed SuDS, the system shall be designed and constructed in line with the Design and Construction Guidance www.water.org.uk/sewerage-sector-guidance-approved-documents/

No Soakaways should be connected to the public surface water sewer.

The supporting documents make reference to drainage using Sustainable Drainage

Systems (SuDS). Where SuDS form part of a continuous sewer system, and are not an isolated end of pipe SuDS component, adoption of SuDS will be considered if requested by the developer if they comply with: Design and Construction Guidance (Appendix C), CIRIA guidance and Southern Water SuDS Guidance available here:

<https://www.water.org.uk/sewerage-sector-guidance-approved-documents/>

<https://www.ciria.org/ItemDetail?iProductCode=C753F&Category=FREEPUBS>

<https://www.southernwater.co.uk/media/l4ndl3db/suds-final-080824.pdf>

Where SuDS rely upon facilities which are not adoptable by sewerage undertakers the applicant will need to ensure that arrangements exist for the long-term maintenance of the SuDS facilities. It is critical that the effectiveness of these systems is maintained in perpetuity. Good management will avoid flooding from the proposed surface water system, which may result in the inundation of the foul sewerage system.

Thus, where a SuDS scheme is to be implemented, the drainage details submitted to the Local Planning Authority should:

- Specify the responsibilities of each party for the implementation of the SuDS scheme.
- Specify a timetable for implementation.
- Provide a management and maintenance plan for the lifetime of the development.

This should include the arrangements for adoption by any public authority or statutory undertaker and any other arrangements to secure the operation of the scheme throughout its lifetime. This initial assessment does not prejudice any future assessment

Environmental Health – Land Contamination

Having reviewed available information, the recommendation of this section is that this application could be approved subject to a condition that takes account of the following;

Development shall cease on site if, during any stage of the works, unexpected ground conditions or materials which suggest potential contamination are encountered, unless otherwise agreed in writing with the Local Planning Authority. Works shall not recommence before an investigation and risk assessment of the identified material/ ground conditions has been undertaken and details of the findings along with a detailed remedial scheme, if required, has been submitted to and approved in writing by the Local Planning Authority. The remediation scheme shall be fully implemented and shall be validated in writing by an independent competent person as agreed with the LPA prior to the occupation of the unit(s).

Information to applicant

Potentially contaminated ground conditions include: imported topsoil, made ground or backfill, buried rubbish, car parts, drums, containers or tanks, soil with extraneous items such as cement asbestos, builders rubble, metal fragments, ashy material, oily / fuel / solvent type smells from the soil, highly coloured material or black staining and liquid fuels or oils in the ground. If in any doubt please contact the Contaminated Land Officer on 01329 236100.

Environmental Health – Pollution

I note that within the Proposed Development Site Plan for Phase 2, an energy centre containing air source heat pumps is indicated in the northern section of the site. A noise impact assessment should be provided for this area, including the proposed plant, to evaluate potential noise effects on nearby residents as well as future occupiers of the development.

Information on the proposed lighting and odour from the site should also be submitted for review.

Coastal Partners

The site is shown by both the Partnership for South Hampshire's Strategic Flood Risk Assessment (PfSH SFRA) and the Environment Agency's Flood Map for Planning to partially lie within Flood Zones 2 and 3 in the present day, and therefore is at risk from a 1:200 year (0.5% annual probability) extreme tidal flood event. The site will be increasingly impacted by climate change and will move further within the extent of these flood zones within the development's lifetime.

The applicant has submitted a Flood Risk Assessment (FRA) compiled by 1st Horizon, dated 14/02/25 in support of the application. Flood risk guidance and modelling is frequently updated and a FRA that is older than 6 months should not be submitted unless accompanied by an addendum, even if it is to inform that the information within the FRA is still current.

We strongly recommend the Environment Agency are consulted on the suitability of the FRA and proposed flood risk mitigation measures.

The FRA states that the two closest node points to the buildings have a modelled flood level of 4.29mAOD for 200 year HC 2125 PPG and 4.67 mAOD for 200 year UE 2125 PPG. Also stated in the FRA is that the Finished Floor Level for any proposed sleeping accommodation should be 0.9m above existing ground levels at the northern extent of the building (3.83mAOD).

It is noted that the FRA states that there is 'no current nor proposed investment to improve the defence' to the site. Notwithstanding the long term flood risk to the site, the Environment Agency's National Coastal Erosion Risk Mapping (NCERM) show the site to be at risk of erosion by 2055. Therefore the management and maintenance of these defences is important for the use and safety of the site and its residents. The FRA or a defence management strategy should explain who owns the existing defences and is responsible for their continued maintenance. How this will be secured and funded for the duration of the development's planned lifetime should also be stated.

The applicant has undertaken modelling to better understand the flood risk to the site. We have reviewed the Coastal modelling report and have the following comments:

- The modelling report mentions that the wave overtopping boundaries were based on nearshore wave climate generated using SoN, with SoN itself is based on Met Office WAVEWATCHIII hindcast and Coastal Flood Boundary Dataset (CFBD). More explanation on this is required as to whether it is the old or newer (2018/19) CFBD.
- The Sea Level Rise (SLR) estimates given in Table 2.1 (p8) and Table 2.3 (p11) align closely with Coastal Partner's in-house SLR tool values. It is good to see that both the 70th and 95th %iles have been considered.
- The report references PPG7, despite this being superseded by the NPPF in 2012. We would expect this to be updated to the current guidance.

- The wave overtopping model hasn't been re-run, but instead a precautionary +20% to all modelled events has been applied. A worst-case scenario using 0.5% AEP event +95th %ile for 2125.
- A breach scenario has been undertaken, with the breach located adjacent to the site. We are unsure how the breach scenario has been determined. Going forwards we would expect more information about the breach scenario, along with any flow path to the site from the harbour side, not just the open coast.
- A comparison of the defence levels between original model and Defra mapping has been undertaken. Original model defence levels are between 6.32-9.53 mAOD. Defence levels obtained from topo survey in 2021 indicate 5.62-7.65 mAOD PLUS extra concrete wall on top of defence bringing final defence height to 7.97-10.2 mAOD. The revised defence height was added to the model, however the wave overtopping flows based on the lower defence height were used in the updated modelling. Therefore, the overtopping values are likely to be more conservative in this modelling.
- Present day modelled flood depths (1:200 yr and 1:1000 yr RP) allow equal to or below 0.1m except for at node 9 where the depth is 0.13m for a present day 1:1000 yr event.
- Future modelled flood depths for a 1:200 yr event in 2125 are more variable at the nodes – up to 0.93m under 70th %ile and 1.31m under 95th %ile (Table 4.2 on p25). However, the maximum modelled flood depth within the site boundary is >1.2m in the northwestern corner near Fort Road.
- Flood hazard values for Present day 1:200 and 1:1000 are classed as negligible, but in 2125, 4 out of 9 of the location nodes indicate 'class 2 – danger for most'. An area of the site is classed as 'significant' hazard in the northwestern corner near Fort Road.

An evacuation management plan has been submitted by the applicant. Whilst Coastal Partners defer to Gosport Borough Council's Emergency Planning team to confirm the contents of this are satisfactory, it should be noted that the proposed evacuation route for 2122 requires travel across areas of 'significant' and 'extreme' flood hazard (using the undefended scenario), therefore safe access and egress may not be possible during a tidal flood event for the duration of the lifetime of the development.

In all circumstances where flood warning and evacuation are significant measures in contributing to managing flood risk, we expect local planning authorities to formally consider the emergency planning and rescue implications of new development in making their decisions.

Appendix J: Gosport Borough Council Emergency Planning Team

From: Emergency Planning Team <emergency.planningteam@hants.gov.uk>
Sent: 24 December 2025 09:29
To: [REDACTED]
Cc: Emergency Planning Team
Subject: RE: Enquiry: Haslar IRC Flood Evacuation Management Plan

Dear Scott,

Thank you for your email and for sharing the 'Haslar IRC Flood Evacuation Management Plan' with us for comment.

Please see below a few suggested updates for your plan.

- Section 2.5 (page 8) – Communication with IRC Inhabitants - Consideration should be given as to how you will communicate with individuals for whom English is not their first language.
- Section 4.0 (page 22) 'EA Flood Warnings – No longer in force' – The County Council are unlikely to advise that it is safe to return to site as we wouldn't have anyone 'on the ground' therefore I would suggest this is left as the Emergency Services advising that it is safe to return.
- Section 5.6 (page 25) – I would suggest this is split as follows:
 - **Upper Tier Local Authority – Hampshire County Council**
 - Provide support to the Emergency Services and other agencies involved in the response.
 - Provide and manage humanitarian assistance as follows:
 - Rest Centres
 - Humanitarian Assistance Centres
 - Assistance at Survivor Reception Centres and Friends and Family Reception Centres.
 - Provide specialist assistance such as public health advice and adult's/ children's social care.
 - Coordinate the activities of the voluntary and faith communities.
 - Provide operational and tactical response in relation to local roads (not those covered by the Strategic Road Network which is managed by National Highways).
 - Undertake Lead Local Flood Authority (LLFA) duties.
 - Support warning and informing activities for the public and media.
 - Lead recovery and restoration activities.
 - **Lower Tier Local Authority – Gosport Borough Council**
 - Provide support to the Emergency Services and other agencies involved in the response.
 - Provide specialist assistance such as environmental health advice.
 - Provide ongoing support to residents whose homes are rendered uninhabitable as a result of the emergency.
 - Support warning and informing activities for the public and media.
 - Lead recovery and restoration activities.

- Appendix C (page 31) – Emergency Contact Numbers
 - Our office number (01962 846 846) is only monitored **in hours** – please note that there are some instances when the line **will not connect** with a member of the team.
 - If you are calling due to an **emergency**, whether it is **in hours or out of hours**, please use our pager number – [REDACTED]
 - Please note that our pager number is **not** for sharing with the public.

Please note that I will forward the plan onto our Flood and Water Management Team for their awareness.

Kind regards



Deputy Head of Emergency Planning and Resilience

Emergency Planning & Resilience Team

Appendix K: UK Health and Security Agency

From: [REDACTED]
Sent: 22 January 2024 11:47
To: [REDACTED] <[REDACTED]@uhhsa.gov.uk>
Cc: [REDACTED] <[REDACTED]@uhhsa.gov.uk>
Subject: [REDACTED]

Warning: This email originated outside of UKHSA. Do not click links or attachments unless you recognise the sender.

Morning [REDACTED]

Many thanks for your response and for taking the time to review the documents - it's greatly appreciated.

Regarding the points you've raised, I will pass these to our Professional Services Team so they can be taken forward and incorporated into RIBA Stage 3. In terms of NHS engagement, we currently have structured meetings in place with NHSE as part of our established governance processes. This engagement will be further strengthened as we move into RIBA 3, with more detailed consultations planned.

We will also work with our planning team to ensure the partnership agreement between the Home Office, UKHSA, DHSC and NHSE is appropriately reflected. I note that the current agreement covers the period 2022-2025; are you aware whether an updated version is in development, or if there is an expected publication date?

Thanks again for your input. Please let me know if you would like to discuss any of the points further.

Finally, for any future engagement, are you happy to remain the point of contact, or should correspondence be directed to a wider team or generic mailbox?

Kind regards,



[REDACTED]
IRC Expansion Programme
Immigration Detention
Home Office, Immigration Enforcement
Tel: [REDACTED]
Office: [REDACTED]
Email: [REDACTED]

From: [REDACTED]
Sent: 22 January 2024 13:02
To: [REDACTED]
Cc: [REDACTED]
Subject: [REDACTED]

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Hi [REDACTED]

I have had a read through, and I don't think there is anything obvious missing. A couple of comments/clarifications below.

One of our concerns would be overcrowding due to the risk of spreading infection and lack of hygiene. Obviously, the plan is to increase the number of beds but is it worth having a sentence about ensuring overcrowding doesn't happen?

I can see that buildings are being redeveloped and implicitly this could lead to better insulation etc. However, there is no specific mention of resilience to heat waves/cold spells. This is a risk, especially to older residents, and as they are detained, residents may have limited ability to reduce their risk (e.g. move to a cooler/warmer area). I think it may be worth having this explicitly mentioned as a mitigation to climate change however I am not sure whether this has been covered in the EIA.

It's good that NHSE have reviewed and commented as they have overall responsibility of healthcare provision. However, I can't see any mention of the governance processes in place. Is it worth saying something along the lines of 'healthcare commissioning and delivery is governed by a national partnership agreement between HO, UKHSA, DHSC, NHSE...'

These are just some things that jumped out at me. Happy to discuss.

Thanks

[REDACTED]
Public Health Specialist
National Health and Justice Team
Health Equity and Clinical Governance
UK Health Security Agency
[REDACTED] <[REDACTED]@uhhsa.gov.uk>

www.gov.uk/uhhsa

UK Health Security Agency

Preparing for, preventing and responding to health threats,
saving lives and protecting livelihoods

Appendix L: Hampshire Police

From: [REDACTED]
Sent: 19 November 2025 12:52
To: [REDACTED]
Subject: [REDACTED]

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Good afternoon [REDACTED]

I have had a chance to review the proposal.

In all honesty nothing leaps out as causing an immediate concern from a policing and public safety perspective. It still remains a case of managing what rhetoric leaks out into the public domain and being as transparent as possible with the local community.

Short of that,

All good from my end.

Regards,

[REDACTED]

[REDACTED]
Police Inspector [REDACTED]
Gosport Neighbourhoods,
Gosport Council offices,

Mobile: [REDACTED]
Email: [REDACTED]



Appendix M: Crown Estates Commissioners

From: [REDACTED]@thecrownestate.co.uk>
Sent: 13 November 2025 09:27
To: [REDACTED]
Subject: RE: OFFICIAL - SENSITIVE Crown Estate Commissioners Engagement - Consultee
Ref:00000000037000000799

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The Crown Estate - Public

Hi Louise

No comment will be fine in the circumstances.

Regards

Iain

From: [REDACTED] >
Sent: 13 November 2025 09:24
To: [REDACTED]@thecrownestate.co.uk>
Subject: RE: OFFICIAL - SENSITIVE Crown Estate Commissioners Engagement - Consultee
Ref:00000000037000000799

You don't often get email from [REDACTED]@homeoffice.gov.uk. [Learn why this is important](#)

Morning Iain,

Thank you for confirming and for checking into this.

The Crown Estate Commissioners were identified as a statutory consultee based on Planning pre-application advice received from the Ministry of Housing, Communities and Local Government. This advice indicated that The Crown Estate should be consulted as part of the planning process for Haslar and Campsfield IRC.

If you are content that there are no Crown Estate ownership interests affected by these proposals, and no further consultation is required, and we can formally note a "no comment" response on your behalf.

Please let me know if you're happy for us to proceed on that basis, or if there's anything further you'd like to add.

Many thanks
Louise

Appendix N: Department for Science, Innovation and Technology

From: [REDACTED]@dsit.gov.uk>
Sent: 16 December 2025 12:56
To: [REDACTED]
Cc: [REDACTED]
Subject: Re: OFFICAL-SENSITIVE Statutory Consultation

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OFFICIAL-SENSITIVE - HMG USE ONLY

Hi Louise,

I hope you're well.

DSIT's correspondence team asked us to review the pre-application documents noted in the chain below. Please see our feedback below and let me know if you have any questions on this.

Many thanks,
Jamie

DSIT feedback

- While not a formal requirement for planning applications, we would advise that consideration is given at the planning and development stage to the digital infrastructure and connectivity requirements of the sites.
- Connectivity services (e.g. mobile voice and data services, fibre broadband/WiFi) are likely to be required for both the construction phase of the sites and for operational requirements. Assessing connectivity service requirements and ensuring adequate provision for the deployment of new digital infrastructure (such as designating space for additional fibre ducting and locations for mobile network infrastructure) will help avoid retrofitting at a later stage.

Recommendations:

- Undertake an assessment of current digital infrastructure provision (mobile and fibre), and an assessment of future connectivity requirements for both the construction phase of development and the operational requirements of the sites.
- Undertake early engagement with connectivity and infrastructure providers at the planning stage to ensure adequate provision of digital infrastructure and connectivity services.
-

Appendix O: Health and Safety Executive

From: LUP enquiries <LUPenquiries@hse.gov.uk>
Sent: 13 November 2025 10:01
To: [REDACTED]
Cc: NSIP Applications
Subject: HSE Engagement - Consultee - Advice required

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Dear Louise,

Thank you for contacting HSE about consultation on the Phase 2 proposals for the Haslar and Campsfield Immigration Removal Centres. I am responding on behalf of the Land Use Planning advice team in HSE's Chemical Explosives and Microbiological Hazards Division (CEMHD).

The role of HSE as a statutory consultee in the planning system is limited the following instances:

a) under the Town and Country Planning (Development Management Procedure) (England) Order 2015 HSE's Land Use Planning advice team (lupenquiries@hse.gov.uk) gives statutory advice on the risk to people at the new development who would be in a consultation zone of an existing site with hazardous substance consent or an existing major accident hazard pipeline (<https://www.hse.gov.uk/landuseplanning/what.htm>). HSE's Land Use Planning web app is at <https://pa.hsl.gov.uk/>. We can confirm that the Haslar and Campsfield Immigration Removal Centres do not lie with within any consultation zones for toxic, highly reactive, explosive or flammable hazards, and therefore HSE's Land Use Planning advice team would not need to be consulted on planning applications at this location.

b) under the Planning (Hazardous Substances) Regulations 2015 HSE's Hazardous Substances Consent team (hazsubcon.cemhd5@hse.gov.uk) gives statutory advice on the granting of hazardous substance consent applications where , and

c) under legislation HSE's Building Safety Regulator (PlanningGatewayOne@hse.gov.uk) gives statutory advice on fire safety of high-rise residential buildings (a relevant building is defined in the planning guidance at gov.uk as: containing two or more dwellings or educational accommodation and meeting the height condition of 18m or more in height, or 7 or more storeys)

Operational health and safety issues, in areas where HSE leads, are not considered by HSE as part of the planning application process, but are considered outside of planning decisions under health and safety laws.

We hope that this takes the proposals forward.

Kind regards

[REDACTED] | Land Use Planning advice team
Health and Safety Executive | CEMHD 5B

 **PROTECTING PEOPLE
AND PLACES**

Appendix P: Department for Energy Security and Net Zero

IRCEP [REDACTED]
To: [REDACTED]
Cc: [REDACTED]

Some content in this message has been blocked because the sender isn't in your Safe senders list.



Dear James,

Thank you for taking my call earlier today. I just wanted to confirm my understanding following our discussion:

- I advised you on the IRC Expansion Programme – Phase 2 project for Campsfield and Haslar.
- You confirmed that no further statutory consultation is required from DESNZ.

Please let me know if this aligns with your understanding or if there's anything further you'd like to clarify.

Kind regards,
Louise

[REDACTED]
IRC Expansion Programme – Phase 2 Project Planner
Immigration Detention
Home Office, Immigration Enforcement

[REDACTED]
Belfast, Northern Ireland

[REDACTED]
Developed with assistance from Copilot



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