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28 October 2026

Proof of Evidence Statement for the Planning Inquiry into the proposed redevelopment and expansion of Haslar IRC (Crown Development Application CROWN/2026/0000005)

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1.0. My experience

1.1. I am Professor of Criminology at the Centre for Criminology in the Faculty of Law at the University of Oxford, where I am also Fellow of St Cross College. I have conducted independent, academic research on immigration detention and border control in the UK since 2009. In that work, I have visited most of the short-term holding facilities (STHFs) and all the immigration removal centres (IRCs) in the UK, including Campsfield House before it closed in 2018.

1.2. In my academic research, I use mixed methods including observations, structured and unstructured interviews, to design and implement staff and detainee surveys, including the *Measure of the Quality of Life in Detention* (MQLD) which, until 2020 was regularly administered across the estate. The results from the surveys were shared in reports with the private contractors and the Home Office and posted on the University of Oxford Law Faculty website. I have drawn on that research in an extensive list of publications and reports.[1]

1.3. In recognition of my academic expertise, in 2016, I was invited to contribute a literature review on the impact of immigration detention on mental health to the *Review into the Welfare in Detention of Vulnerable Persons* by Stephen Shaw, which lead to significant

[1] See, for example: M Bosworth (2014) *Inside Immigration Detention*, Oxford University Press; M Bosworth (2015) 'Measuring the Quality of Life in Immigration Detention'. Available at: http://bordercriminologies.law.ox.ac.uk/measuring-quality-of-life-immigration-detention/ (Accessed 21.9.2026); M. Bosworth (2019). 'Authority and Affect in Immigration Detention', *Punishment & Society*. 21(5): 542 – 559; M Bosworth and A Gerlach (2020) *Quality of Life in Detention: Results from MQLD questionnaire data collected in IRC Gatwick (Brook House and Tinsley House), IRC Heathrow (Colnbrook and Harmondsworth), Yarl's Wood IRC, Morton Hall IRC, and Dungavel IRC: July 4 – September 20, 2019.* Oxford: Centre for Criminology; M Bosworth (2025) *Supply Chain Justice: The Logistics of British Border Control*. Princeton University Press.

changes in the administration of immigration detention in the UK.[2] Two years later, in 2018, I wrote a literature review on alternatives to detention in Shaw's follow-up review. I also co-convened an event on staff culture and contributed a paper on this topic which was included in the 2018 report.[3]

1.4. In 2021-2022 I was appointed as an Expert to the Brook House Inquiry, with a specific remit to report on staff culture. In that role I produced two separate reports and gave evidence at the hearing.[4]

1.5. In September 2026 I produced a proof of evidence statement for the planning inquiry into the proposed extension of Campsfield House IRC (Crown Development Application CROWN/2026/0000004) for Reed Smith, much of which is relevant for this statement too.

In my Proof of Evidence below, I draw on this prior research experience plus the material shared with me by Six Pump Court and other publicly available evidence about Haslar Immigration Removal Centre and immigration detention in the UK.

1.6. As set out in my letter of instruction, I have been provided by Six Pump Court with the:

(a) Planning Statement in respect of Campsfield IRC (Cushman & Wakefield) dated 27 May 2026.

(b) Local Community Impact Assessment (AtkinsRéalis) dated 21 May 2026;

(c) Statement of National Importance in respect of Haslar IRC dated 29th May 2026;

1.7. The letter of instruction from Six Pump Court asks for my expert opinion on:

(a) The implications of expanding Haslar IRC to 600 places. In particular, please address the relevance of institutional scale, shared accommodation, privacy, freedom of association, access to visitors and services, and arrangements for vulnerable people. Identify which findings from your research and other reliable evidence can properly be applied to this proposal, and their limitations;

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[2] M Bosworth (2016) 'The Impact of Immigration Detention on Mental Health: Literature Review'. In *Review into the Welfare in Detention of Vulnerable Persons: A Report to the Home Office by Stephen Shaw*. London: HMSO, Cm 9186.

[3] M Bosworth (2018) 'Alternatives to Detention: A Literature Review'. In *Assessment of Government Progress in Implementing the Report on the Welfare in Detention of Vulnerable Persons: A Follow-Up Report to the Home Office by Stephen Shaw*. Cm 9661. London: HMSO. pp. 213 – 247; M Bosworth (2018) 'Annex 10. Staff culture in immigration removal centres.' In *Assessment of Government Progress in Implementing the Report on the Welfare in Detention of Vulnerable Persons: A Follow-Up Report to the Home Office by Stephen Shaw*. Cm 9661. London: HMSO. pp. 207 – 211.

[4] M. Bosworth (2021). *Brook House Inquiry: Report of Professor Mary Bosworth, 17 November 2021.* Available here: [redacted] M. Bosworth. (2022). *Brook House Inquiry Supplementary report of Professor Mary Bosworth, 9 February 2022*. Available here: https://s3-eu-west-2.amazonaws.com/brookhouse-prod-storage-15trcu6wv3q1/uploads/2022/03/INQ000123-Supplementary-report-of-Professor-Mary-Bosworth---09-FEB-2022.pdf.

(b) The applicant's reliance on healthcare, screening and operational safeguards, including whether these answer the relevant risks and how the proposed new accommodation may improve conditions;

(c) Capacity and alternatives to detention, but only insofar as these fall within your expertise. Distinguish nominal bedspace from usable capacity and avoid assumptions that all detention can be replaced by one alternative; and

(d) Any additional information needed, the matters on which a confident opinion cannot presently be given, and any measures capable of reducing the identified adverse effects.

1.8. I confirm that the evidence which I have prepared and provide for this Public Inquiry in this Proof of Evidence is true. I confirm that the opinions expressed are my true and professional opinions.



Mary Bosworth, 28 October 2026

Summary

The planning application for the expansion of Haslar Immigration Removal Centre should be considered in the context of the wider system of immigration detention and deportation as well as in regards to its local impact. Official statistics from the Home Office reveal a system with consistently available bedspace. While the numbers entering detention have been slowly increasing since 2023, the growth rate appears to have slowed over the past twelve months. That context is relevant because detention is a national system. People move around it in response to operational demands, to facilitate their removal or to make space for others who are about to be removed.

While additional capacity could assist the Home Office manage unforeseen future issues and closures elsewhere, in my view the case for such possibilities has not been made. Indeed, their own statistics demonstrate that the system has operated with unoccupied rooms while two IRCs have been closed for refurbishment, Colnbrook and Dungavel. Although the Home Office and the Planning Statement refer to the arrivals of people on small boats as a reason for expanding Haslar, unless the government plans to change its policy of placing the majority of people seeking asylum into alternative accommodation, those numbers do not appear to be relevant.

In any case, administrative convenience needs to be balanced against the known risks associated with immigration detention which the government has acknowledged in the *Adults at Risk policy.* Research suggests that these risks are likely to be exacerbated in an institution of the scale of the proposed extension, which would more than double the size of Haslar. Prisons research has found that size matters. Smaller institutions are safer, more respectful, and better able to deliver purposeful activity. These findings have been replicated in detention in the Measure of the Quality of Life in Detention survey. Such matters are likely to adversely affect the mental health of detained people and of those who work with them. These will, in turn, create pressures on local healthcare. Given that staff are likely to be recruited locally, these will have other collateral consequences on people living nearby, which seem not to have been considered. There seems to be a misunderstanding in the local community impact assessment about the nature of the 'care and separation unit' (CSU) within the IRC, which is included in the section on the possible impacts on local healthcare services. The CSU is not a healthcare site. It is a segregation unit designed to hold people briefly, ("removal from association") under the specific terms of *Detention Centre Rule 40* and *Detention Centre Rule 42*.

Other, more practical issues have also been insufficiently addressed. Information provided in the planning documents pays insufficient attention to the impact on the local area of increased traffic of arrivals and departures which will occur throughout the day and night. High rates of immigration bail which characterise the detention estate do not seem to have been properly factored in or understood. The low number of estimated visitors per day is particularly concerning and if this comes to pass risks adversely affecting people's mental health. More effort needs to be made to facilitate face to face visits for those incarcerated. Insufficient evidence is provided about how staff and detained men will access and share facilities between the two parts of the site, nor how or whether the noise and other pollution created during the construction period of the proposed development will be mitigated.

Redactions within the planning documents, including in the architectural designs make it very hard to judge the nature of the facility and its likely impact on workers, detained people and the local population. However, experience and evidence from similarly sized, secure institutions reveals enduring problems created by scale and custodial design. The necessity for the higher security design has not been explained and without that explanation its likely impact on emergency services is hard to gauge.

The Context of the Planning Inquiry: Immigration detention in the UK

2.1. While the planning inquiry pertains specifically to Haslar IRC, it is helpful to place the institution in the wider context of policy and practice, not least because the government has justified pursuing this Crown Application route due to capacity and other challenges in the wider system.[5] I will return to some of the points listed in this section further below.

2.2. Haslar was originally built in the nineteenth century as an army barracks. It was a designated an Immigration Removal Centre in 2002 and was operated under detention centre rules by the Prison Service on behalf of the Home Office until 2015, with space for 160 adult men.

2.3. Haslar officially closed in 2016, and has remained unused since then, for a period of over ten years.

2.4. In 2022, then Home Secretary Suella Braverman announced plans to re-open, refurbish, and then expand Haslar as part of a bid to add 1000 additional bed spaces across the immigration detention estate.

2.5. Haslar is still undergoing extensive refurbishment. The first phase is currently predicted to finish in 2027, when the centre is due to open with an operational capacity of 130 bed.

2.6. This Planning Inquiry concerns the second phase and the proposed development that would add 470 beds across four new three storey accommodation blocks and a 'care and separation unit' (CSU).[6]

2.7. According to the Home Office's most recent published statistics, "There were 2152 people being held in detention (at an immigration detention facility or in prisons under immigration powers) at the end of June 2026."[7] Of that total, 1941 individuals were housed in one of 7 IRCs; During that period of time (Q2 2026) Dungavel IRC, was closed for refurbishment.

2.8. In a written response to Lord Collins of Highbury, on 19 October 2026, the Home Office reported that as of 6 October 2026, the IRC estate has an operational capacity of 2555 beds.[8]

2.9. While the sum of people detained in IRCs on 30 June 2026 was around 7% greater than the equivalent number who were detained one year previously, i.e. on 30 June 2025 (1808), the increase in the occupancy rate seems to reflect a slower processing of people rather than an expansion in the use of detention since fewer people entered detention in Q1 (4707) or Q2 2026 (4897) than had arrived in any other Quarter over the previous two years.

2.10. Immigration detention is an administrative form of custody that, in the UK operates without a statutory upper time limit for anyone other than pregnant women and families. According to Home Office guidance, while the power to detain is retained "in the interest of maintaining effective immigration control… there is a presumption in favour of bail and, wherever possible, alternatives to detention are used".[9] This form of custody is "most usually appropriate" the guidance goes on, "to effect removal, initially to establish

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[5] Home Office (2026) *Statement of National Importance: Haslar Immigration Removal Centre (IRC), My 2026.*

[6] Atkins Réalis (2026). *Local Community Impact Assessment: Haslar Immigration Removal Centre.* para 1., p. 8.

[7] Home Office (2026). 'How many people are detained under Immigration Act Powers in the UK?' Available at: https://www.gov.uk/government/statistics/immigration-system-statistics-year-ending-june-2026/how-many-people-are-detained-under-immigration-powers-in-the-uk. Last Accessed 23 October 2026.

[8] HL. Deb, 19 October 2026, cW.

[9] Home Office 2026 Guidance, Detention: general instructions. Updated 9 October 2026. Available at: https://www.gov.uk/government/publications/offender-management-caseworker-guidance/detention-general-instructions-accessible. Last Accessed 23 October 2026.

a person's identity or basis of claim, where there is reason to believe that the person will fail to comply with any conditions attached to a grant of immigration bail."[10] In practice, over half the population is released back into the community, nearly all on immigration bail.

2.11. The pathway to detention varies; some people end up there from prison following a criminal conviction, others as a result of working without or for violating the terms of their visa. While most asylum applicants are placed in alternative forms of noncustodial accommodation, some may be detained as part of that process; still others may be detained once their asylum claim has been rejected. The diversity of the population and the reasons for their detention create a custodial environment of some uncertainty which has been shown to negatively impact the mental health and wellbeing of staff and detained people.[11]

2.12. The lack of certainty about the duration of detention, the rapid turnover of the detained population and shift patterns make it hard for staff to get to know those who are detained. Matters are compounded by language barriers and high levels of anxiety among the detained population. Low staffing levels relative to the detained population can also make it hard to find the time to talk meaningfully.[12]

2.13. All these aspects are exacerbated in larger detention centres, where they contribute to high rates of distress among detained people and staff. Those rates of distress have been documented in multiple rounds of surveys with staff and detained people administered by the research team in Oxford.[13]

2.14. The reopening and expansion of Haslar was announced under the Sunak Conservative government in 2022, as part of a response to the increasing number of people arriving on small boats in search of asylum, alongside a similar plan to re-open and expand Campsfield House IRC in Kidlington, Oxfordshire. While Haslar has yet to re-open, the government's own statistics show that at the end of Q3 2025; Q1 2026 and Q2 2026 Campsfield was not yet full. Across the country, the overall numbers detained remains less than the capacity of beds available.

3.0. The implications of expanding Haslar IRC from 130 to 600 places.

3.1. The planning documents describe the proposed development in fairly general terms, and much of the design detail, which is labelled on the architectural plans as a "concept design only" is redacted, making it difficult to understand what the final design is likely to be or how the buildings will be used.[14] However, existing research on other similar sized custodial institutions is instructive, including that on prisons.

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[10] Ibid.,

[11] M Bosworth (2014), *Inside Immigration Detention*. Oxford University Press; S Shaw 2016 R*eview into the Welfare in Detention of Vulnerable Persons: A Report to the Home Office by Stephen Shaw*. London: HMSO, Cm 9186. K Eves (2023). *Brook House Inquiry Report, Volume II*, para 12., p. 178.

[12] M Bosworth (2018) '"Working in this place turns you racist": Staff, Race and Belonging in Immigration Detention', in M Bosworth, A Parmar and Y Vázquez (Eds) *Race, Migration and Criminal Justice: Enforcing the Boundaries of Belonging*. Oxford: Oxford University Press. pp. 214 – 228.

[13] M Bosworth and A Gerlach (2020); M Bosworth et al (2015). *Understanding Staff Culture at Heathrow IRC*. Oxford: Centre for Criminology; M Bosworth and L Haas (2023). *Staff Culture in immigration detainee escorting*. Oxford: Centre for Criminology. Available at: https://www.law.ox.ac.uk/sites/default/files/inline-files/Staff%20Culture%20report_final_21.12.2023.pdf

[14] See for example, Ministry of Justice (2026), 'Accommodation: Indicative General Arrangement' available at: https://find-crown-development.planninginspectorate.gov.uk/applications/7fe2266a-f9a0-4e95-a294-54c363c7821d/documents/01LFF32MKHXCROME2LFZA23E7MHZ26LW4B. Last Accessed 23 October 2026.

3.2. In regards to scale, research on immigration detention at the University of Oxford, including the MQLD, which measures detainees' perceptions of the IRC in which they are residing including their views on their immigration case, mental health and their overall quality of life, routinely found that rates of detainee distress were lower in smaller facilities. Those facilities, which included Tinsley House and Dungavel, scored better on all parameters, including: institutional decency, officer respect, immigration fairness and consistency, healthcare and trust, safety and detainee cohesion.[15] These institutions also take other, less penal, architectural forms.

3.2. These findings from detention are reinforced by the more extensive research available about prison size. Thus, for example, a 2016 meta-analysis of 124 HMIP reports found "smaller prisons were significantly more likely to achieve 'good' scores on safety, respect, and purposeful activity. Those prisons under 400 were seven times more likely to score 'good' on safety, almost five times more likely to score 'good' on respect, and they were over five times more likely to score 'good' on purposeful activity."[16]

3.4. The authors of the article were clear: "size, more than any other factor, still predicted prison performance and that larger prisons were assessed by HMI Prison inspectors as being less safe, less respectful and less able to engage prisoners in purposeful activity."[17]

3.2. In addition to scale, the design of Phase 2 appears set to reproduce many of the known consequences of placing people for immigration matters in institutions that resemble prisons which include: minimal access to outdoor space, mistrust among detained people and between staff and those who were detained.[18]

3.3. While the indicative elevations and 'concept design' suggests that Haslar will not follow the usual H-Block or radial design used in other IRCs and associated with Category B prisons, the height of the fencing, and the number of rooms per building suggest that people will be held in secure cellular confinement. Without additional detail, it is hard to assess the living conditions. It is also unclear where the facilities that detained people will need – education, healthcare, the shop, the library, multi faith areas and so on are located, nor how they will be accessed.

3.4. Compounding matters, when it was previously operational, HM Inspectorate of Prisons found that "Detainees received significantly fewer visits than at most other centres, due to the distance, cost and difficulty of making the journey to Gosport."[19] While the contractor (HMPPS) established a visitor's centre, and extended visit times, two years later when HMIP returned for a brief follow-up, the geographical barriers to visiting remained with HMIP reporting that "The distance that visitors had to travel was a common concern, and there was no assisted visits scheme to help them maintain family ties."[20]

3.5. While disentangling the causes of and contributing factors to distress is beyond the remit of this Planning Inquiry, I note that evidence from prisons research points to the

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[15] M Bosworth and A Gerlach (2020). 'Executive Summary'. page 13.

[16] I Madoc-Jones, E Williams, C Hughes, and J Turley (2016) *Prison building 'Does size still matter?': A Re-Assessment.* Prison Service Journal (227), p. 7.

[17] Ibid.., p. 9.

[18] M Bosworth and A Gerlach (2020). p. 13

[19] HMIP (2009). *Report on an announced inspection of Haslar Immigration Removal, 20 – 24 April 2009 by M Chief Inspector of Prisons.* London: HMIP. p. 14. Available at: https://webarchive.nationalarchives.gov.uk/ukgwa/20130605030757/https://www.justice.gov.uk/publications/inspectorate-reports/hmi-prisons/immigration-removal-centres/haslar. Last Accessed 28 October 2026.

[20] HMIP (2011). Report on an unannounced short follow-up inspection of Haslar Immigration Removal Centre 31 May – 3 June 2011 by HM Chief Inspector of Prisons. London: HMIP, p. 12. Available at: https://webarchive.nationalarchives.gov.uk/ukgwa/20130605030757/https://www.justice.gov.uk/publications/inspectorate-reports/hmi-prisons/immigration-removal-centres/haslar. Last Accessed 28 October 2026.

importance of staff/prisoner relationships, which also formed a key part of the Brook House Inquiry. In that regard, I note that the staffing levels reported in the Cushman & Wakefield *Planning Statement* seem to suggest that their numbers will not expand in line with the greater sum of people detained. The Statement references 149 staff currently employed to work with 130 detained people in the new facility for 600 people, only 265 new members are staff will be recruited.[21] There is no explanation given for the staff/detainee ratio, nor how the staff will be deployed across the two sites.

3.6. In other large facilities, like Harmondsworth, Brook House and Colnbrook, my research has found staff struggle to maintain meaningful contact with the detained populations, as much of their time is used on routine and administrative matters, from 'fabric searches' to headcounts.[22] While the most recent inspection of Brook House by HMIP found matters were improving, they noted that "some officers continued to congregate in offices instead of proactively managing the wings."[23]

3.7. During the Brook House Inquiry, the facility was shown to have operated with consistently low numbers due to high staff turnover, which had created some of the ensuing problems that led to the inquiry.

3.8. My understanding is that the newer contracts require higher staff/detainee ratios and greater scrutiny that they are maintained. Yet, without having seen the contract for Haslar it is difficult to know how such matters will be managed. In any case, everyday issues will remain, ranging from providing adequate and safe scrutiny of vulnerable individuals at risk of suicide who must be regularly monitored, to adequate recruitment of officers.

3.9. The redacted planning documents make it hard to understand how facilities (e.g. for dining, education, sport and religion) will be shared between the two parts of the IRC. My research experience in Colnbrook and Harmondsworth found staff there reluctant to open 'free flow' among all the units to enable everyone to use facilities at the same time. While such matters can be mandated by the Centre Manager, there is a risk that the more secure new buildings will be used to house people in cells who are considered to be more difficult to manage. Their access to facilities may, as a result, be more limited than those in Phase 1. Again, more detail about such matters would help in assessing the plans.

4.0. Effects on the local community and those working and detained within Haslar

4.1. Many of the letters from local residents submitted to the planning process expressed concerns about the impact of Haslar on their everyday activities particularly in regard to traffic. There were also concerns about the likely impact of the IRC on local healthcare.

4.2. In their Planning Statement, Cushman & Wakefield estimate 774 "daily Vehicle Movement".[24]

4.3. They report that "Operational shift patterns are anticipated to follow established IRC working practices with peak traffic times for staff at the site to be between 7am – 9am and 5pm – 8pm".[25] Such times are highly likely to interfere with school drop offs and collections as well as everyday working people's transportation.

4.4. In their *Local Community Impact Assessment* ("LCIA") Atkins Réalis claim that during its operational phase, "The Transport and Travel Plan for expansion of the Haslar IRC suggest that the Proposed Development would not have a severe impact upon the

[21] Cushman & Wakefield (2026). *Planning Statement Haslar IRC* May 2026, para 3.5., p. 7.
[22] M Bosworth (2019). 'Authority and Affect in Immigration Detention', *Punishment & Society*. 21(5): 542 – 559.
[23] HMIP (2025), p. 12.
[24] Cushman & Wakefield (2026), para 3.5., p. 8.
[25] Ibid., para. 3.14., p. p.

operation of the local highway network,"[26] although they acknowledge there will be some disruption during the construction phase.[27]

4.5. The rapid turnover of detained people is not acknowledged in the Cushman & Wakefield report. Instead, they write, without providing detail or evidence that while "more arrivals than normal during the initial weeks after opening of the expanded facility whilst the site ramps up to capacity…once the extended facility is fully operational, the average amount of vehicle arrivals with detained persons onboard will continue in line with existing operational practice."[28]

4.6. While the report goes onto acknowledge, again without figures, that "the number of vehicles could be higher during high-profile operations", it claims that "these instances will be the exception as opposed to the rule".[29]

4.7. In a system where over 50% of the total numbers entering detention in any quarter are bailed into the community and where, as Cushman & Wakefield acknowledge, all such "arrivals and discharges could take place at any time during a 24-hour period,"[30] it is hard to see how there will not be considerable traffic coming to and from the centre at all hours. Unlike prisons, reception at IRCs is not limited to business hours. The effect of those irregular hours on those detained or on the local residents nearby is not addressed.

4.8. Similar points could be made about the use of emergency services. While primary healthcare will be provided inside Haslar and will be procured through the NHS,[31] extensive work on the provision of healthcare in detention from groups ranging from the British Medical Association to Medical Justice document a vulnerable population with complex physical and mental health needs, which are exacerbated by a period of detention.[32]

4.9. There seems to be a misunderstanding in the LCIA about the nature of the 'care and separation unit' (CSU) within the IRC. The CSU is included in the section on the possible impacts on local healthcare services, as a site within the IRC "to deliver additional specialist services for those residents who require further care and/or separation from the main site population".[33] The CSU is not a healthcare site. It is a segregation unit designed to hold people briefly, ("removal from association") under the specific terms of Detention Centre Rule 40 and Detention Centre Rule 42.[34]

4.10. In their most recent report on Heathrow IRC, the Independent Monitoring Board describes the CSU in Harmondsworth, a facility of equivalent size to the proposed development at Haslar, thus: "There is a care and separation unit (CSU), with six rooms for detained people who are removed from association or temporarily confined under Rules 40 and 42 of the Detention Centre Rules. These rooms are very basic and contain one steel bed, limited furnishings, a toilet with no seat and a wash basin. There is a shared shower facility off the recreation space outside the room, which also contains a small

[26] Atkins Réalis (2026)., para. 5.1.2., p.28.
[27] Ibid., para., 5.1.1., p. 25 – 26.
[28] Ibid., para., 3.19., p. 10.
[29] Ibid.,
[30] Ibid.,
[31] Ibid., para., 3.22., p. 10; AtkinsRéalis, (2026), para. 5.2.2., p. 30.
[32] British Medical Association (2018). *Locked up, locked out: health and human rights in immigration detention*. [redacted] Last Accessed 22 September 2026; Medical Justice (2023). *Clinical Safeguards Continue to Fail across all IRCs*. Available at: [redacted] Last accessed 22 September 2026.
[33] AtkinsRéalis (2026), para. 5.22., p. 30.
[34] https://www.gov.uk/government/publications/removal-from-association-and-temporary-confinement/removal-from-association-detention-centre-rule-40-and-temporary-confinement-detention-centre-rule-42-accessible. Last accessed 28 October 2026.

dining table with a television fixed to the wall. There is a small, secure courtyard for fresh air, smoking and exercise."[35]

4.11. Evidence given at the Brook House Inquiry made very clear that this form of accommodation should not be used for people who have mental health crises.[36]

4.12. According to Cushman & Wakefield, "emergency care will be routed to local hospitals only in exceptional circumstances."[37] Modelling in the Health Needs Assessment for the proposed development estimates that "planned outpatient appointments in secondary care represent 4.1% of the detained population profile and emergency escorts represented 1.1% of the detained population."[38] In a population of 600 men, these percentages would amount to nearly 25 outpatient appointments and nearly 7 emergency visits, although the time frame for such visits is unclear, meaning that more detail is needed to assess the viability of safeguarding provision and its impact on healthcare provision locally, within a community that the LCIA notes has a high deprivation index and poor health outcomes.[39]

4.13. Given the modelling by AtkinsRéalis which assumes that most employees will be recruited locally,[40] I am also concerned that insufficient attention has been paid to the impact of working in the IRC on employees and on any collateral consequences for their families in the assessment of the impact of the IRC on local healthcare.

4.14. While Cushman & Wakefield mention the availability of "mental health services for staff and detained persons"[41], and AtkinsRéalis report that "it is assumed that staff and IRC residents will have access to mental health and wellbeing support to mitigate any adverse effects arising from their work environment"[42] neither provide explanation or detail about the nature of this support, once again making it very difficult to assess the nature of viability of safeguarding provision.

4.15. Finally, and in regards to those who are detained, contact with family and friends is an important protective factor for mental health and wellbeing among incarcerated populations. It is therefore of great concern that in an institution for 600 adult men, Cushman & Wakefield seem only to anticipate "10 -15 persons" visiting per day. Instead, they note, "there is a facility for virtual visits, reducing the need for visitors to travel to the site."[43]

4.16. The location of Haslar will be difficult for most people to visit, as few of those detained are likely to have been living in the nearby area. There is no information about how or whether the contractor will attempt to mitigate such matters.

5.0. Capacity and alternatives to detention

5.1. A key justification for the Crown Development Order is set out in the Home Office's May 2026 *Statement of National Importance*, where they write: the "470 additional secure bed spaces…. is critical to strengthen detention capacity, enabling more

[35] IMB (2026). *Annual Report of the Independent Monitoring Board at Heathrow Immigration Removal Centre*. London: IMB. Available here: https://cdn.websitebuilder.service.justice.gov.uk/uploads/sites/13/2026/06/Heathrow-IRC-IMB-2024-annual-report.pdf, last accessed 28 October 2026. p, 4.
[36] Eves (2023), *The Brook House Inquiry Report, Volume II*., pp. 121 – 124.
[37] Cushman & Wakefield (2026), para., 6.99., p. 44.
[38] Cushman & Wakefield (2026), para., 3.25, p. 10.
[39] AtkinsRéalis (2026), paras., 4.3 – 4.4., pp 21 – 23.
[40] Ibid., para. 5.1.2., pp. 26 - 27.
[41] Cushman & Wakefield (2026), para., 6.98, p. 44.
[42] AtkinsRéalis (2026), para. 5.2.2., p. 30.
[43] Cushman & Wakefield (2026), para., 3.17., p. 9.

enforced returns, including of Foreign National Offenders, and individuals with no lawful right to remain, thereby supporting public safety, border integrity and the resilience of the immigration system."[44]

5.2. However, the underlying modelling for this demand has not been made available, meaning the urgency of or indeed need for this planning application is impossible to ascertain impartially.

5.3. Instead, in their *Planning Statement*, Cushman & Wakefield claim that "Current demand for immigration detention capacity vastly outstrips supply,"[45] linking this unevidenced claim in the next sentence to "small boats" which they describe as "just one source of irregular migration."

5.4. This framing appears to suggest that IRCs are commonly used to house people who travel irregularly to the UK across the Channel. Instead, most of those who arrive in this fashion claim asylum and are thus placed into asylum accommodation after a brief period of detention at Manston holding centre. There is no evidence provided that such people will end up in Haslar, nor any reason to think from current practice that they will be.

5.5. While small numbers of people who had travelled in this manner were briefly detained under the 'one in one out' pilot scheme with France announced in July 2025, and operational between August 2025 and September 2026, in October 2026 it was widely reported that the scheme is no longer operational.[46] By the end of the pilot around 1400 people had been returned to France, [47] a total that represents the equivalent of just under 4 additional individuals detained per day.

5.6. A few paragraphs further on in their report, Cushman & Wakefield put forward a second reason for needing more space, namely that "detention is used for effecting the deportation of Foreign National Offenders".[48]

5.7. Setting aside the implied association of people seeking asylum with those in prison, once again this claim needs considerably more evidence to justify expanding a system where 50% of those who are detained are released into the community, and thus not deported.

5.8. In their *Planning Statement*, Cushman & Wakefield refer to 2540 beds split across 8 IRCs, of which they estimate around 2300 were usable.[49] This gap, they explain, springs from matters including the need for periodic refurbishment, as well as single-sex accommodation and the need for single occupancy. Colnbrook IRC, for example, was closed from 23 February – 15 April 2026 for refurbishment.

5.9. According to the detailed dataset provided by the Home Office in their most recent statistical report[50], released on 30 June 2026, 1941 of the IRC bed spaces were

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[44] Home Office, (2026). *Statement of National Importance, Haslar Immigration Removal Centre (IRC)*, March 2026, p. 1.

[45] Cushman & Wakefield (2026), para. 5.5, p. 22.

[46] EIN (2026), 'Closure of 'one in, one out' small boats scheme for returns of asylum seekers to France', Electronic Immigration Network, 6 October 2026. Available at: [redacted] Last accessed 28 October 2026.

[47] Cuibus, M. (2026). 'Labour's pledges on migration: the data', 16 September 2026. University of Oxford: The Migration Observatory. Available at: [redacted] Last Accessed 28 October 2026.

[48] Ibid., para. 5.11, p. 23.

[49] Cushman & Wakefield (2026), para 5.18., pp 24 -25.

[50] Home Office (2026) *How Many People are Detained under Immigration Act powers in the UK?* Available at: https://www.gov.uk/government/statistics/immigration-system-statistics-year-ending-june-2026/how-many-people-are-detained-under-immigration-powers-in-the-uk. Last Accessed 22 September 2026.

occupied. If we take the 2300 figure provided by Cushman & Wakefield, this leaves 359 unoccupied.

5.10. If we use the more recent figure provided on 19 October 2026 by the Home Office in the House of Lords, of 2555, 614 beds were unoccupied.

5.11. While the numbers entering detention have been slowly increasing from a low point in 2023, when 11256 people entered an IRC, the growth rate appears to have slowed over the past twelve months.[51]

5.12. As a national system, in which people are moved for administrative convenience, to facilitate their removal or to make space for others who are about to be removed or deported, that overall picture is relevant to assessing the need for expanding Haslar.

5.13. Not only has the system been in operation for over a decade without needing Haslar, but there is reason to think that the numbers detained at any point could be lowered further, were the Home Office to improve on their ability to use detention for its primary purpose – to effect removal. Instead, Home Office statistics consistently show that the majority of people entering detention in any period are released into the community on bail. Such consistent inability "to effect removal" through this form of custody, suggests that at least some periods in detention are avoidable, further drawing into question the need for additional spaces.

5.14. In recognition of this contradiction, there has been extensive research into and development of alternatives to detention. As I noted in my 2018 report to the second Shaw Review, it remains the case that the majority of people subject to immigration control are not detained.[52] Even those who are found to have no right to remain predominantly are, in other words, safely and effectively managed through alternative mechanisms.

5.15. Research has found that properly funded alternatives to detention that provide adequate support in terms of housing and community-based casework, but also information and education have a far better outcome on people's mental health and also on their compliance with immigration rules.[53]

5.16. Given the lower cost of these options, and their improved outcomes for people's mental health, it is unclear why these case work alternatives have not been developed instead of pursuing increased capacity in the detention estate.

5.17. Alternatives would be cheaper and would involve a different and potentially wider range of providers, including those which operate 'not for profit', thereby improving the likelihood of value for money. For example, Detention Action has for many years been running the Community Support Project as an Alternative to Detention. On their website they characterise this work as an "alternative to detention scheme that works with people who have experienced or are at risk of detention. The participants in the project all have significant barriers to removal and begin working with the CSP up to three months before their release from prison." 95% of participants have not reoffended and 83% complete the project.[54]

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[51] Home Office (2026), 'Number of entries into immigration detention, by initial place of detention, year ending December 2010 to year ending June 2026', Available at: https://www.gov.uk/government/statistics/immigration-system-statistics-year-ending-june-2026/how-many-people-are-detained-under-immigration-powers-in-the-uk. Last Accessed 24 September 2026.

[52] M Bosworth (2018) 'Alternatives to Detention: A Literature Review'. In *Assessment of Government Progress in Implementing the Report on the Welfare in Detention of Vulnerable Persons: A Follow-Up Report to the Home Office by Stephen Shaw*. Cm 9661. London: HMSO. pp. 213 – 247

[53] International Detention Coalition (2015). *There are alternatives: A handbook for preventing unnecessary immigration detention*. Available at: [redacted] Last Accessed 22 September 2026.

[54] https://detentionaction.org.uk/community-support-project/

6.0. Any additional information needed and measures capable of reducing the identified adverse effects

6.1. The redaction of the architectural drawings as well as limited information provided in the planning documents about the regime provisions for detained people, the deployment or training of staff, the relationship between the two parts of the IRC in terms of facilities and how that will work in practice, and the precise details of healthcare provided make it hard to assess the likely impact of the facility in planning terms.

6.2. While the planning statements emphasise the security provisions as safeguarding the community, if the building design and provision of activities follows similar sized IRCs elsewhere, a period of detention will not just have a deleterious effect on the mental health of detained people but will have some effect on the local community too, whether in regards to use of emergency services, or through their impact on the staff who live locally and their families, on visitors and on other support services. While the secure design will prevent escapes, it will not stop the institution affecting the wider community.

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Appendix 3 – Home Office (2026). 'How many people are detained under Immigration Act Powers in the UK?'

Appendix 4 – HL. Deb, 19 October 2026, cW.

Appendix 5 – Home Office 2026 Guidance, Detention: general instructions. Updated 9 October 2026.

Appendix 6 – M Bosworth (2014), Inside Immigration Detention. Oxford University Press.

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Appendix 8 – K Eves (2023). Brook House Inquiry Report, Volume II, para 12., p. 178.

Appendix 9 – M Bosworth (2018) '"Working in this place turns you racist": Staff, Race and Belonging in Immigration Detention', in M Bosworth, A Parmar and Y Vázquez (Eds) Race, Migration and Criminal Justice: Enforcing the Boundaries of Belonging. Oxford: Oxford University Press. pp. 214–228.

Appendix 10 – M Bosworth and A Gerlach (2020). 'Executive Summary'. page 13.

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Appendix 13 – Ministry of Justice (2026), 'Accommodation: Indicative General Arrangement'.

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Appendix 22 – IMB (2026). Annual Report of the Independent Monitoring Board at Heathrow Immigration Removal Centre. London: IMB.

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