Haslar IRC

Transport Rebuttal to Rule 13 Submissions

Home Office

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1 Introduction

1.1 Overview

1.1.1 This document has been prepared by [redacted] in response to documents provided by No Detention No Haslar in their position as a Rule 13 Party.

1.1.2 It considers the Statement of Case submitted by No Detention No Haslar and the Proofs of Evidence submitted by the witnesses associated with the Rule 13 submission and offers a rebuttal to the transport points raised.

1.2 Documents considered

1.2.1 The following documents have been reviewed as part of the Rule 13 submission

- Statement of Case – No Detention No Haslar
- Proof of Evidence – Mike Brown of No Detention No Haslar
- Proof of Evidence – Mary Bosworth of the Centre for Criminology in the Faculty of Law at the University of Oxford
- Proof of Evidence – Gee Manoharan of the Association of Visitors to Immigration Detainees

1.2.2 The Proof of Evidence of Lisa Incledon of Medical Justice was considered but has not been included in this rebuttal as no transport points were identified.

2 Rebuttal to No Detention No Haslar

2.1 Introduction

2.1.1 A Statement of Case has been submitted by No Detention No Haslar (NDNH) in their position as a Rule 13 Party. The evidence submitted considers transport in Part C, Section 4.

2.1.2 The following topics were raised in the No Detention No Haslar Statement of Case:

- Outstanding concerns in Hampshire County Council Highways response dated 7th August 2026;
- Impacts of construction traffic;
- Operational impacts and the Travel Plan;
- Visitor trips; and
- Access, parking and accessibility.

2.2 Outstanding Highway Concerns

2.2.1 The NDNH Statement of Case states that Hampshire County Council (HCC) Highways response dated 7th August 2026 identified outstanding questions concerning access design, trip generation, parking, sustainable travel and the Travel Plan. It also referenced Gosport's Regulatory Board resolution of 29 July 2026 which recorded concerns about cumulative traffic, bus provision, constrained peninsula access and redacted material relating to transport.

2.2.2 Following the submission of their initial comments, HCC were issued with unredacted versions of the Transport Assessment and Travel Plan. Subsequent correspondence with HCC through documents and in meetings has since agreed these outstanding points, including access design, trip generation, sustainable travel and an updated to the Travel Plan.

2.2.3 A letter from HCC Highways to the Crown Development Case Team dated 20th October 2026 confirms that the Local Highway Authority raises no objection to the proposal from a highway and transport perspective, subject to conditions and the entering into of a Unilateral Undertaking to secure the following:

- Active travel contributions of £131,533;
- A Traffic Regulatory Order contribution of £12,312 towards parking restriction extension onto Fort Road; and
- The submission and implementation of a Full Travel Plan, payment of Travel Plan approval and monitoring fees and the provision of a surety measure to ensure the implementation of the Travel Plan.

2.2.4 The following conditions have been proposed by HCC and are agreed:

- A management plan for large vehicle access shall be submitted to and approved by the LPA in writing, in consultation with the LHA, prior to first occupation of the development. Access by large vehicles shall be secured to be in accordance with this management plan in perpetuity thereafter.
- Reserved matters submissions shall provide a minimum of 300 vehicular parking spaces and 44 covered and secure cycle parking spaces

- A Construction Traffic Management Plan shall be submitted to and approved by the LPA, in consultation with the LHA, in writing before development commences. This must include; adequate dedicated parking provision for the public, Phase 1 staff and contractors, turning provision to be made on site, measures to prevent mud from being deposited on the highway and a programme for construction. The agreed details shall be fully implemented before the development is commenced.

- Submission of the detailed design of the access arrangements to the car park off Fort Road/ Military Road (including pedestrian provision and a Road Safety Audit) to be made to the LPA, in consultation with the LHA, at the Reserved Matters stage. The detailed design shall be approved in writing prior to approval of any future Reserved Matter application. The agreed access (including pedestrian infrastructure) shall be provided prior to first occupation.

- The works to Dolphin Way including formalising parking arrangements and priority for vehicles entering from Fort Road shown in principle on drawing 22613196-STA-XX-XX-DR-TP-0204 Rev A shall be delivered prior to first occupation.

- A visitor minibus operating 09:00-21:00 every day between the Gosport ferry/bus station and the site every 30-minutes shall be provided from first occupation and shall operate in perpetuity thereafter.

2.2.5 The Proof of Evidence of [redacted] submitted in October 2026 addressed the comments from Gosport Borough Council pertaining to cumulative traffic, bus provision, constrained peninsula access and redacted material relating to transport.

2.3 Construction

2.3.1 The NDNH Statement of Case states that “Under [Local Plan policy] TR6, where proposals would have a severe adverse impact on the transport network or an unacceptable impact on highway safety, taking account of proposed mitigation, they should be refused. This applies equally during the construction and operational phases. The Outline Environmental Management Plan (“OEMP”) anticipates approximately 19 months of works and provides for a subsequent Construction Environmental Management Plan (“CEMP”) and Construction Logistics Plan (“CLP”). It does not, however, establish the anticipated construction movements or demonstrate in sufficient detail how contractor parking, deliveries and emergency access, including temporary parking during works to the Sea Wall Car Park, would be accommodated alongside the refurbished centre’s operation”.

2.3.2 Section 5.7 of the Proof of Evidence of [redacted] explains how parking will be phased during construction so that public, staff and contractor parking can continue to be accommodated on site while the permanent car park is delivered. A Construction Traffic Management Plan will be secured by condition and agreed with the Local Highway Authority before development commences, including measures to manage construction traffic and provide adequate dedicated contractor parking within the site.

2.4 Operation and Travel Plan

2.4.1 The NDNH Statement of Case identifies that the assessment assumes 80% of staff will drive a car or van and seeks a reduction to 70% over five years.

2.4.2 The Travel Plan includes an initial car driver mode share of 80%, with a car passenger mode share of 8% and a motorcycle/scooter mode share of 1%. This equates to a total vehicle-based mode share of 89%. The five-year target included in the Travel Plan is for 70% car driver mode share, a 10% car passenger mode share and a 2.5% motorcycle/scooter mode share. This results in a target vehicle-based mode share of 82.5%. The total change in vehicle-based modes is therefore -6.5%.

2.4.3 The measures included in the Travel Plan have all been agreed with HCC and include, among other measures, the provision of secure and covered cycle parking on site, the provision of travel information for staff and the option for extending the operational time of the 'visitor minibus' to facilitate its use by staff.

2.4.4 HCC have also been provided with a surety measure to ensure the implementation of the Travel Plan.

2.4.5 With regard to shift changeovers, the submitted Transport Assessment (Section 4.3) set out a staff usage profile based on discussions with the Home Office Immigration Enforcement team and their target operational model to demonstrate the operational requirements for the site and based on the primary times of Day Shift Change at 07:00 and Night Shift Change at 19:00.

2.4.6 The daily profile of staff indicated that, on average, there will be 296 staff on site during the day and 118 staff on site at night.

2.4.7 The staff whose roles require attendance closer to office hours which work closer to office roles arrive half an hour after and depart half an hour before the other daytime staff. This 30-minute offset between staff results in a higher number of staff on site at shift change of between 368 (07:00-07:30) staff and 323 (19:00-19:30).

2.4.8 The proposed staff parking provision at the end of the Refurbishment and Expansion phase is for a total of 294-302 staff car parking spaces comprised of 35-43 along Dolphin Way and 259 in the Haslar Sea Wall Car Park.

2.4.9 The proposed car driver mode share for staff travel to work trips is 80%. This is to be achieved through a Staff Travel Plan which encourages active travel, car sharing and public transport use. At the peak shift change there will be 368 staff changing between 07:00 and 07:30. Therefore, the parking requirement for this period is around 295 spaces to manage the hand over. The scheme is proposing around 300 spaces in the two primary parking locations, noting there are some operational spaces on site in addition to the main staff parking areas. During the day, the additional spaces required for the hand over shift period, will be managed and not for use by day staff.

2.4.10 This is based around a shift pattern that has been provided by the Home Office and is suitable for the operation of the site and addresses any potential overspill.

2.4.11 With regards to NDNH requesting further information around effects on the surrounding network, junction capacity modelling has been undertaken at both the Dolphin Way / Fort Road junction and Military Road / Fort Road junction, as requested by HCC during pre-application discussions.

2.4.12 Due to the shift patterns and organisation of minibus and servicing trips, the site is not anticipated to generate any trips during the AM peak hour, and a negligible number of two-way trips during the PM peak hour. The level of impact on the operation of the local highway network is therefore considered to be immaterial.

2.4.13 As no staff trips are forecast during either the AM or PM peak hour, this capacity modelling was based on an assumed a sensitivity scenario in which the staff trips forecast during 07:30-08:00 were shifted half an hour so that they coincided with the AM peak hour. The PM peak wasn't changed as there are no staff trips forecast within the hour either side of the PM peak hour. Minibus and servicing trips were kept the same.

2.4.14 While this scenario is unlikely, it provides an opportunity to test the operation of the site access junctions and therefore represent a more robust position.

2.4.15 This modelling found that these junctions would operate within capacity during both the AM and PM peak hours in the 2030 sensitivity scenario.

2.4.16 A network distribution exercise was undertaken using 2011 Census journey-to-work data to inform the assignment of development traffic across the wider highway network. The results did not identify any additional material impacts requiring further assessment, and no additional concerns were raised by HCC.

2.5 Visitors

2.5.1 The NDNH Proof of Evidence considers visitors thus:

> "The TA states that all visitors will arrive by minibus from Gosport ferry/bus station, whereas the Planning Statement provides for dedicated visitor parking and estimates 10-15 daily visitors. The Applicant should reconcile those accounts and explain whether the proposed minibus service can accommodate realistic visiting demand, including visiting hours, capacity, and accessibility".

2.5.2 Visitor trips to the site will be a managed process, with visitors scheduled to arrive and depart the site outside of staff changeover time. It is understood that the term visitors apply to both friend/family visits, and also social workers/solicitors.

2.5.3 It is anticipated that movements of the 10-15 visitors expected across a day can be accommodated using the minibus service.

2.5.4 Whilst visitors will be encouraged to use the minibus service from Gosport Ferry/Bus Station, some may drive due to mobility issues. During the day, there will be a surplus of spaces in the Haslar Sea Wall Car Park. These can be managed to accommodate visitors on site and appointments will be scheduled to avoid staff changeover times.

2.6 Access, Parking and Accessibility

2.6.1 NDNH sought assurance that the proposed single-lane working and vehicle manoeuvres can operate safely without impeding access to the coastal path, obstructing emergency movements or exposing pedestrians to risk.

2.6.2 Dolphin Way currently and historically features informal parking along the southern kerb line and, in practical terms, operates as a one way with opposing vehicles giving way to each other.

2.6.3 The proposals seek to formalise this operation, with designated parking bays (controlled by the IRC) and the introduction of formal traffic control with priority from Fort Road. This will minimise the risk of traffic queuing back onto the public highway as the traffic 'giving-way' will be egressing the IRC and therefore queued along Dolphin Way.

2.6.4 The give way control will be located between bays 17 and 18, which provides a full road width to allow vehicles to pass. This results in the formal one-way operation being limited to around 100m between the give way and Dolphin Way junction.

2.6.5 HCC noted that proposals for formal one-way operation, with priority given for those leaving Fort Road (adopted highway), is a betterment over the previous/existing situation. The LHA are content this will not give rise to an unacceptable safety impact when accessing and egressing the site.

2.6.6 When the site was previously operational, larger vehicles have been accommodated as part of a managed process and it is proposed that this would be the same in the future.

2.6.7 HCC requested additional information to support the proposed use of this access by larger vehicles.

2.6.8 Stantec have tracked a 16.5m articulated vehicle along the link with the parking in-situ, noting that this manoeuvre would be marshalled and at slow speed. The tracking suggests that, as a minimum, spaces 21 and 22 would need to be suspended allowing the vehicle to exit the site.

2.6.9 The tracking also indicates that the Dolphin Way junction does not require any amendments to the junction layout to support a larger vehicle. This is in line with Policy TR4 of the National Planning Policy Framework, which considers street design, access and parking.

2.6.10 HCC have stated that an approach in which parking will be suspended and banks persons will be used to manage access appropriately is acceptable and should be secured by condition.

2.6.11 The pedestrian route that passes along Dolphin Way towards the Haslar Sea Wall is defined as routing along the southern kerbline of the link, using the partial narrow footpath which only runs along the western section of the road. It is considered that pedestrians typically will use the road space, noting that historically parking is located along the southern kerbline and the carriageway ends in a cul-de-sac with limited demand, hence low traffic. Therefore, access via Dolphin Way will not be affected by the proposals as it retains the current access principles.

2.6.12 There is an additional 'blue light' emergency access proposed which will utilise an existing access onto Fort Road. The NDNH Statement of Case requests details of the drawing construction and operation.

2.6.13 The principle of the development's access locations has been agreed with HCC, as highway authority. These are based on existing points of access. Detail of the Blue Light access design, including the visibility splays and a Stage 1 Road Safety Audit will be submitted as part of the Reserved Matters application.

2.6.14 The TA identifies 294-302 operational spaces and separately refers to 20 public spaces. NDNH sought assurance in their Statement of Case that the definitive provision is consistent across the plans and will meet demand, particularly at the time of shift handovers, without creating unacceptable parking overspill or obstructing safe access.

2.6.15 The proposed staff parking provision at the end of the Refurbishment and Expansion phase is for a total of 294-302 staff car parking spaces comprised of 35-43 along Dolphin Way and 259 in the Haslar Sea Wall Car Park. The 20 public spaces are in a separate area of the Haslar Sea Wall Car Park and are considered separately to the staff provision.

2.6.16 As stated previously, there is sufficient parking on the site to accommodate peak parking demand at shift changeover, which will be a maximum of 295 spaces.

2.6.17 HCC have agreed that the car park layout is to be progressed at the Reserved Matters stage should the site come forward. They have requested that at least 300 car parking spaces are provided on site to prevent overspill parking on the local highway network and are seeking to secure this via a condition.

2.6.18 Finally, with regards to public transport, NDNH identifies that the existing bus local provision is limited, with only four services a day.

2.6.19 Section 3.3 of the Transport Assessment set out that the current bus route 11 is a limited service with a frequency of 90 minutes and no service provision during shift change over times. As such, any request for a contribution towards this service would be unworkable and not considered compliant with guidance in the NPPF.

2.6.20 Public transport has not been promoted as a major modal shift opportunity in either the Transport Assessment or the Travel Plan. As per the Transport Assessment and Travel Plan, it is likely that any increase in public transport mode share will be linked to a change in use of the visitor minibus and expanding for staff use at peak shift change.

2.6.21 After the meeting, HCC reviewed the request for a contribution towards public transport. HCC have concluded having taken advice from their PTG team, that the cost for running additional

buses to coincided with the shift change, would be significant and, in the longer term, unlikely to become commercially viable. Therefore, on the basis of an agreement to review the possible, use of the minibus for staff, a contribution for PT is now NOT being requested by HCC.

2.6.22 HCC have instead considered a requirement for a contribution to the LCWIP schemes in the area. HCC have sought a proportionate approach to LCWIP cost for the IRC and a contribution of £131,533 which has been agreed with the Home Office.

3 Rebuttal to the Proof of Evidence of Mike Brown

3.1 Introduction

3.1.1 A Proof of Evidence has been submitted by [redacted] of No Detention No Haslar.

3.1.2 The primary transport topic raised by [redacted] in their Proof of Evidence pertained to the ease of visitor access.

3.2 Visitor Access

3.2.1 In the Proof of Evidence, [redacted] refers to the location of Haslar as being at the tip of the Gosport Peninsula with no rail access:

> "Visitors arriving by train at Fareham would require a 39-minute bus journey to Haslar, while those arriving by train at Portsmouth Harbour would need to catch the ferry to Gosport (4-8 sailings per hour, 4-minute crossing) followed by a 10-minute bus journey to Haslar. There are only three buses per day to bring visitors to the Haslar site (0959, 1139, 1319) at times which are practical for visiting and returning (1142, 1322, 1502) to their rail connection home. A return taxi fare from the Gosport ferry costs in the region of £20".

3.2.2 As stated previously, a minibus will be provided for visitors from Gosport Ferry/Bus Station to the site. This journey will take approximately 5 minutes.

3.2.3 Whilst visitors will be encouraged to use the minibus service, some may drive due to mobility issues. During the day, there will be a surplus of spaces in the Haslar Sea Wall Car Park. These can be managed to accommodate visitors on site and appointments will be scheduled to avoid staff changeover times.

4 Rebuttal to the Proof of Evidence of Mary Bosworth

4.1 Introduction

4.1.1 A Proof of Evidence has been submitted by [redacted] of the Centre for Criminology in the Faculty of Law at the University of Oxford.

4.1.2 The following topics were raised in [redacted] Proof of Evidence:

- Level of arrivals and departures across a day;
- Timings of staff shift changeover with respect to school hours;
- Impact of immigration bail at all times of day; and
- Visitor access.

4.2 Level of arrivals and departures across a day

4.2.1 In Section 4.0 of their Proof of Evidence, [redacted] considers the effects on the local community. They state that a total of 774 daily vehicle movements are anticipated.

4.2.2 The 774 movements is the total daily two-way trip generation, incorporating staff, servicing and minibus trips. These occur mainly either before the AM peak hour or after the PM peak hour.

4.2.3 Due to the shift patterns and organisation of visitor and servicing trips, the site is not anticipated to generate any trips during the AM peak hour, and a total of four two-way trips during the PM peak hour. The level of impact on the operation of the local highway network is therefore considered to be negligible.

4.3 Timings of staff shift changeover with respect to school hours

4.3.1 Continuing in Section 4.0, [redacted] considers the effects of trips on school drop offs and collections as well as everyday working people's transportation.

4.3.2 These trips will likely occur during the highway network peak hours. As stated previously, staff shift changeover will occur outside of these times.

4.4 Impact of Immigration Bail

4.4.1 The level of trips associated with immigration bail has been raised:

"Cushman & Wakefield acknowledge, all such "arrivals and discharges could take place at any time during a 24-hour period," it is hard to see how there will not be considerable traffic coming to and from the centre at all hours."

4.4.2 It is considered that movements arising from the release of individuals on immigration bail, following individual bail decisions, will not be material. It is likely that if they are released during the day, they will be transported on the minibus to Gosport Ferry/Bus Station, from which they can access bus/ferry services to either Fareham or Portsmouth Harbour railway stations.

4.4.3 In the event that an individual is discharged outside of the minibus hours of operation, the local highway network is lit and features a footway on at least one side at all locations between the site and Gosport town centre.

4.5 Visitor Access

4.5.1 Finally, the Proof of Evidence of [redacted] considers the accessibility of the site for visitors:

> "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."

4.5.2 This point has been addressed previously in Section 2.5 and 3.2 of this document.

5 Rebuttal to the Proof of Evidence of [redacted]

5.1 Introduction

5.1.1 A Proof of Evidence has been submitted by [redacted] of the Association of Visitors to Immigration Detainees.

5.1.2 The primary transport topic raised by [redacted] in their Proof of Evidence pertained to the ease of visitor access, specifically for legal representation.

5.1.3 This point has been addressed previously in Section 2.5 and 3.2 of this document.

6 Summary

6.1 Overview

6.1.1 This document has been prepared by [redacted] in response to documents provided by No Detention No Haslar in the position as a Rule 13 Party.

6.1.2 It considers the Statement of Case submitted by No Detention No Haslar and the Proofs of Evidence submitted by the witnesses associated with the Rule 13 submission and offers a rebuttal to the transport points raised.

6.1.3 The rebuttal to the No Detention No Haslar Statement of Case (Section 2) addresses outstanding highway concerns, construction, operation and the Travel Plan, visitors, and access, parking and accessibility. Hampshire County Council (HCC) Highways has since been provided with unredacted versions of the Transport Assessment and Travel Plan, and in its letter of 20th October 2026 raises no objection from a highway and transport perspective, subject to conditions and a Unilateral Undertaking securing active travel and Traffic Regulatory Order contributions and a Full Travel Plan. Construction parking and traffic will be managed through a Construction Traffic Management Plan secured by condition. The Travel Plan targets a reduction in vehicle-based mode share from 89% to 82.5%, the site is not forecast to generate trips in the AM peak hour, and junction modelling shows the site access junctions operating within capacity. Around 300 staff parking spaces will be secured by condition to meet the shift changeover demand of around 295 spaces, a visitor minibus will serve the site, and HCC has accepted the Dolphin Way arrangements for access, including the management of larger vehicles.

6.1.4 The rebuttal to the Proof of Evidence of [redacted] (Section 3) responds to the primary transport topic raised, which is the ease of visitor access to a site at the tip of the Gosport Peninsula with no rail access and limited bus services. A minibus will be provided between Gosport Ferry/Bus Station and the site, with a journey time of approximately five minutes. Visitors who need to drive due to mobility issues can be accommodated in the Haslar Sea Wall Car Park, where there will be a surplus of spaces during the day, with appointments scheduled to avoid staff changeover times.

6.1.5 The rebuttal to the Proof of Evidence of [redacted] (Section 4) addresses the level of arrivals and departures across a day, the timing of staff shift changeover with respect to school hours, the impact of immigration bail, and visitor access. The 774 daily movements comprise two-way staff, servicing and minibus trips which occur mainly outside the network peak hours, with no trips forecast in the AM peak hour and four two-way trips in the PM peak hour, so the impact on the local highway network is considered negligible. Staff shift changeover will take place outside the peak hours, and therefore outside school drop-off and collection times. It is considered that movements arising from the release of individuals on immigration bail, following individual bail decisions, will not be material, with the minibus used during its operating hours and a lit footways present for discharges outside those hours. Visitor access has been addressed in Sections 2.5 and 3.2.

6.1.6 The rebuttal to the Proof of Evidence of [redacted] (Section 5) responds to the primary transport topic raised, which is the ease of visitor access, specifically for legal representation. This point has been addressed previously in Sections 2.5 and 3.2, where it is explained that visitor trips will be managed and scheduled outside staff changeover times, that the visitor minibus will connect Gosport Ferry/Bus Station with the site, and that parking will be available on site for those who need to drive.