



HASLAR IMMIGRATION REMOVAL CENTRE – SUSTAINABILITY STATEMENT

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Client signoff

Client	Home Office
Project	Haslar Immigration Removal Centre – Proposed Development
Job number	100099070
Client signature/date	



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Executive Summary

AtkinsRéalis were commissioned by The Home Office to write a Sustainability Statement to outline the planning application for the expansion of the Haslar Immigration Removal Centre (IRC). The existing IRC refurbishment is currently taking place.

The Phase 1 renovation works consists of the refurbishment and fit out of the existing buildings located on the development. The majority of the existing partitions and structure are to be retained, and the previous room usages are to be kept the same. The Phase 2 new build elements will include a new healthcare building, reception area, dining area, server room, classroom, and kitchen extension.

The Phase 2 proposed development will include a new build development on a greenfield area within the existing perimeter of the IRC. The planning application, and therefore this Sustainability Statement, is specific to the expansion of the Haslar site.

The site is located within the administrative area of Gosport Borough Council and therefore the Gosport Local Plan, 2011-2029, and the Supplementary Planning Documents (SPD) have been referenced in determining the local sustainability requirements that should be considered. This project is seeking outline planning permission through the Crown Development route. The project will meet all relevant planning requirements. This report summarises the key measures taken to achieve holistic sustainability in the development. The purpose of this report is to assess the extent to which the Development complies with the principles of sustainable development and the relevant planning policy requirements.

The Home Office's operational estate comprises a diverse portfolio of buildings across the UK, supporting critical national functions including border security, immigration services, law enforcement, and counter-terrorism. These facilities range from high-security offices and data centres to IRC facilities and regional hubs, many of which are classified as operational critical due to their role in maintaining public safety and national resilience.

This report follows Gosport Borough Council's Sustainable Design and Construction Supplementary Planning Document (SPD) guidance issued in April 2014 and the Gosport Borough Council's Local Plan.



1. Introduction

- 1.1.1. The Haslar IRC project brief is to expand the available floorspace on-site and develop on-site facilities. The site was originally Haslar Barracks, between 1804-1951, before becoming a youth offenders' facility from 1953 until 1989. In 2002, the site became an IRC. The centre ceased to be operational in 2015.
- 1.1.2. The proposed development is located within the existing site at 2 Dolphin Way, Gosport, Hampshire, PO12 2AW. This report will identify the standards for net zero (NZ) and holistic sustainability for this Immigration Removal Centre, then apply those that were practically achievable to optimise the estate. The Haslar IRC development has considered these factors during RIBA Stages 1 and 2 to embed into the design, construction, and operation of the building.
- 1.1.3. Figure 1-1 shows the indicative proposed site plan. The red line indicates the site application boundary.

Figure 1-1 – Indicative Proposed Site Plan



NOTE: THIS IS A CONCEPT DESIGN ONLY

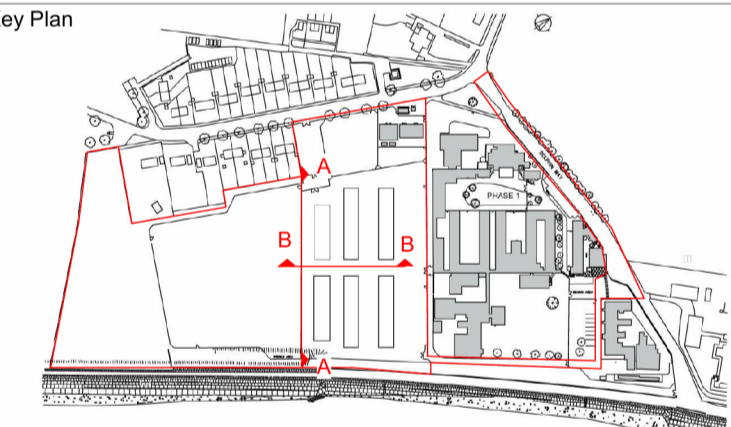
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Notes

LEGEND

- Site Application Boundary
- Existing Fence
- New Fence
- Existing Fence to be removed
- ▲ Main Entrance to the Units
- 3-Storey Accommodation Units
- 1-Storey Units

Rev	Issued by	Issued to	Date	Description
P08	ATR		02/04/2026	For information
P07	ATR		18/03/2026	Car park updated
P06	ATR		08/12/2025	Trees updated as for Arboicultural survey
P05	ATR		29/09/2025	Trees removed
P04	ATR		13/03/2025	Phase 2 Revised Design Final Submission - BPRN updated
P03	ATR		07/02/2025	Car Parking amended
P02	ATR		29/11/2024	Revised Stage 2 packages
P01	ATK	MoJ	29/09/2023	Phase 2 RIBA Stage 2 Final Submission



Project Status
 Outline Planning Application

Client **Project** Haslar IRC
Ministry of Justice
 Ministry of Justice, 102 Petty France, London, SW1H 9AJ

Project Description / Site

Indicative New Buildings
Project Address
 Dolphin Way,
 Gosport,
 Hampshire
 PO12 2AW

Building Type
 SITE PLAN

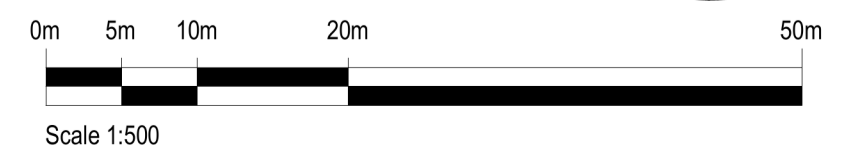
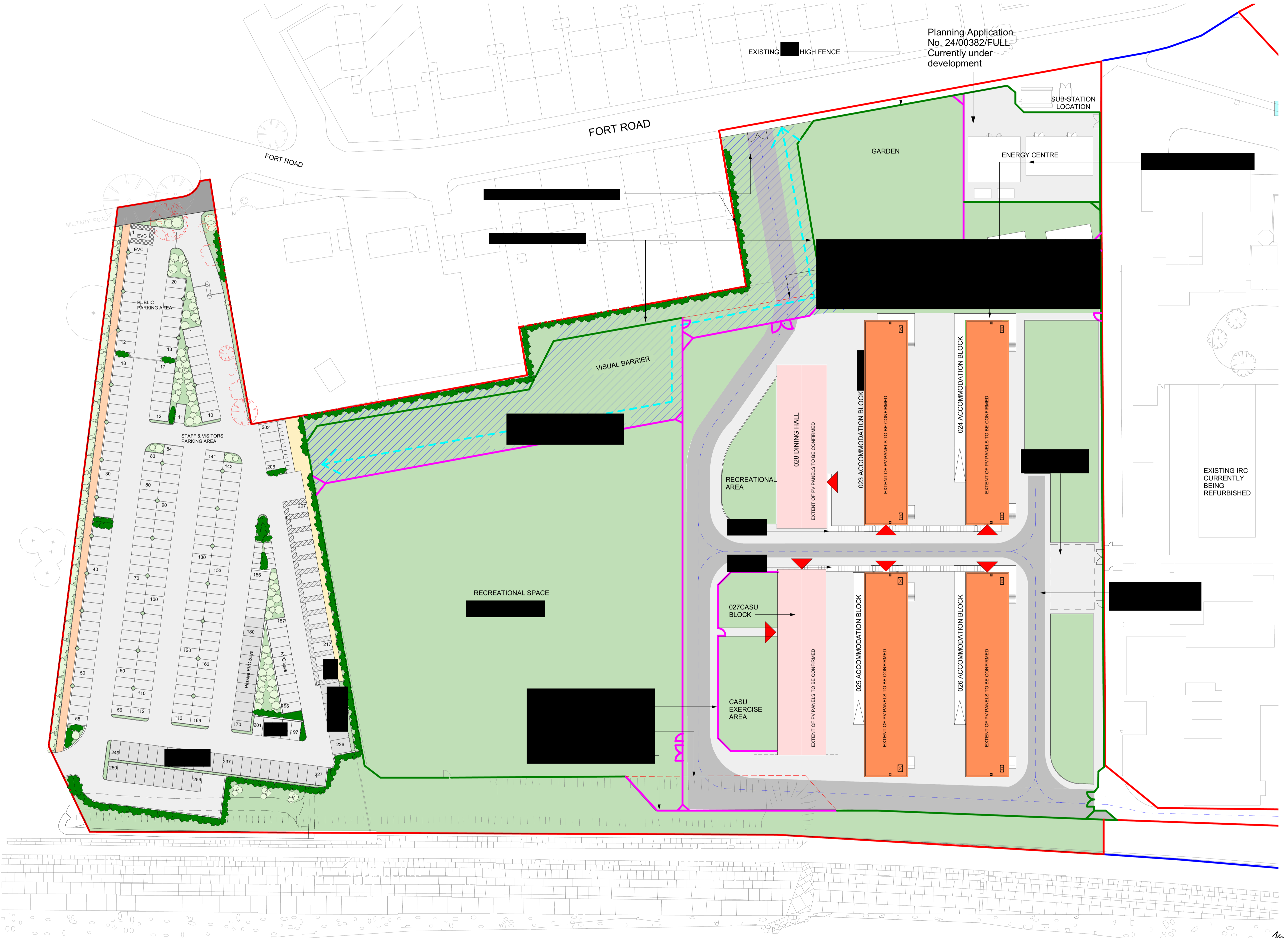
Drawing Title
 INDICATIVE PROPOSED SITE PLAN

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 OFFICIAL [REDACTED] **Suitability**
 S2



1.2. Existing IRC Refurbishment Works

1.2.1. The existing IRC refurbishment works involve the refurbishment of the existing buildings and six new buildings. This does not form part of the proposed development and is for context purposes. These works are replacing the current buildings on a like for like basis except the healthcare and kitchen extension. This includes the following building types:

- Dormitory blocks
- Education/Training Centres
- Healthcare Block (New Build)
- Office/Administration/Visitor Centre Facilities
- Multifaith Spaces
- Gymnasium
- Plant rooms

1.3. Proposed Development

1.3.1. The proposed development will involve new builds on the current brownfield site directly to the west of the existing refurbishment site. These are to consist of four new dormitory blocks providing 470 bed spaces, a Care and Separation Unit (CASU) and a new Dining Hall, a car park, and recreational field. Building occupation is targeted for 2030, exact date subject to procurement of service operator.



2. Sustainability in Relation to Development

- 2.1.1. For the Haslar IRC project, sustainability is defined as combining social integration, economic viability, and environmental responsibility. A high standard of sustainability is targeted in all aspects of the development.
- 2.1.2. The National Planning Policy Framework (NPPF), in defining sustainable development, is based around three overarching objectives. These are:
- An **economic** objective – to help build a strong, responsive, and competitive economy, by ensuring that sufficient land of the right types is available in the right places and at the right time to support growth, innovation, and improved productivity; and by identifying and coordinating the provision of infrastructure.
 - A **social** objective – to support strong, vibrant, and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations; and by fostering a well-designed and safe built environment, with accessible services and open spaces that reflect current and future needs and support communities' health, social and cultural well-being.
 - An **environmental** objective – to contribute to protecting and enhancing our natural, built, and historic environment, including making effective use of land, helping to improve biodiversity, using natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change, including moving to a low carbon economy.
- 2.1.3. Sustainability is a key focus of the proposed development. The Home Office (HO) is undertaking the project in a way that is beneficial to the environment, society, and local economy. The 17 United Nations Sustainable Development Goals (UNSDGs) are based on the principle of 'leaving no one behind' and emphasise a holistic approach to achieving sustainable development. In response to this agenda, this project has aligned the proposed development to the UNSDGs¹.



Figure 2-1 - United Nation Sustainability Development Goals

¹ United Nations, No Date. Sustainability. [Online] Available at: <https://www.un.org/en/academicimpact/sustainability>.

3. Planning Policies and Legislation

3.1. National Planning Policy Framework

- 3.1.1. In 2019, the UK became the first major economy to set a legally binding target to bring greenhouse gas emissions to net zero by 2050². The Haslar IRC site will be an example of how policy and standards shape the design processes for new and refurbished buildings.
- 3.1.2. The Government published the National Planning Policy Framework which sets out the planning policies for England and how these should be applied. It provides a framework within which locally prepared plans for housing and other developments can be produced. The National Planning Policy Framework is a material consideration in planning decisions and has been considered when preparing the development plan³. It supports the International Panel on Climate Change (IPCC)'s third report, which established that "widespread electrification, sustainable biofuels, low emissions hydrogen, energy conservation & efficiency and Carbon Dioxide removal counterbalanced against residual carbon, energy storage, demand side management, and materials efficiency will be required to reach net zero"⁴.
- 3.1.3. Haslar IRC Phase 2 will follow the Crown Development route to achieve outline planning permission. On 1st May 2025, MHCLG published Planning Guidance and Planning Application Forms for Crown Development. The Home Office has carried out a pre-application process to inform the proposed development and ensure the proposal has been appropriately assessed. MHCLG provided pre-application advice for the outline planning application in December 2025, and these recommendations have been included within this document.

3.2. Greening Government Commitments

- 3.2.1. The Greening Government Commitments (GGC) set out sustainability targets for all UK government departments and executive agencies, including the Home Office, to reduce their environmental impact and lead by example in achieving net zero. Key targets, part of the GGC's 2021-2025 framework, include:
- Reducing greenhouse gas emissions by at least 50% compared to 2017–18 levels
 - Minimising water consumption and improve efficiency
 - Cutting waste and increasing recycling, aiming for less than 10% to landfill
 - Improving sustainable procurement, including low-carbon products and services
 - Enhancing biodiversity across the estate
 - Promoting sustainable travel, reducing reliance on fossil-fuel vehicles

² HM Government, 2021. Net Zero Strategy: Build Back Greener. [Online] Available at: [net-zero-strategybeis.pdf \(publishing.service.gov.uk\)](https://www.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/96427/net-zero-strategy-beis.pdf).

³ Ministry of Housing, Communities & Local Government, National Planning Policy Framework, 2021. Available: [National Planning Policy Framework \(publishing.service.gov.uk\)](https://www.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/96427/national-planning-policy-framework.pdf).

⁴ IPCC, 2022: Summary for Policymakers *Climate Change 2022: Impacts, Adaptation, and Vulnerability*. Contribution of Working Group II to the Sixth Assessment Report of the Intergovernmental Panel on Climate Change Cambridge University Press.



- 3.2.2. These principles have been considered throughout the development and will apply to both new build and retrofit projects.

3.3. Gosport Borough Council

- 3.3.1. Haslar IRC is located within the administrate of Gosport Borough Council. The council have set out in their Climate Change Strategy 2022 that they are committed to reaching Net Zero carbon in their operations by 2050. This also includes an aspiration for Gosport Borough to reach Net Zero by 2050. This is in accordance with government policy, namely the Climate Change Act 2008 (amended in 2019) and the 6th Carbon Budget (emission reduction target of 78% by 2035, in comparison to 1990 levels) as part of the Government's Net Zero Strategy. More locally, this target reflects Gosport Borough Council policy including the Climate Change Motion 2020 and the Draft Gosport Borough Local Plan 2038.

3.4. The Gosport Borough Local Plan

- 3.4.1. The Gosport Borough Local Plan 2011-2029 previously set out the Sustainable Environment Strategy. The Draft Gosport Borough Local Plan 2040 is currently in development and will outline the planning strategy for the Borough up to 2048. It is timetabled to be adopted by March 2027 and includes planning policies and proposals for new developments. This responds to the Climate Emergency by setting out ambitious but achievable standards for policy CC04: Sustainable Design and Construction.
- 3.4.2. The Local Plan sets out objectives for development within the Borough. Policies relating to the site and proposed development have been listed in the Haslar IRC Planning Strategy.
- 3.4.3. Key sustainability objectives comprise the following, with the location in this report of the integration of these principles in the proposed development shown in brackets:
- Reducing carbon emissions (Section 4.1)
 - Integration of renewable and low-carbon energy systems (Section 4.3)
 - Climate change adaptation (Section 6.1)
 - Water efficiency (Section 4.5)
 - Sustainable transportation (Section 4.4)
 - Use of low-impact construction materials (Section 4.6)
 - Promoting biodiversity and green infrastructure (Section 7.3)



3.5. Haslar Barracks Conservation Area Appraisal

3.5.1. The Haslar Barracks site was designated as a Conservation Area in 2018. Figure 3-1 shows the buildings of historic interest on the site.

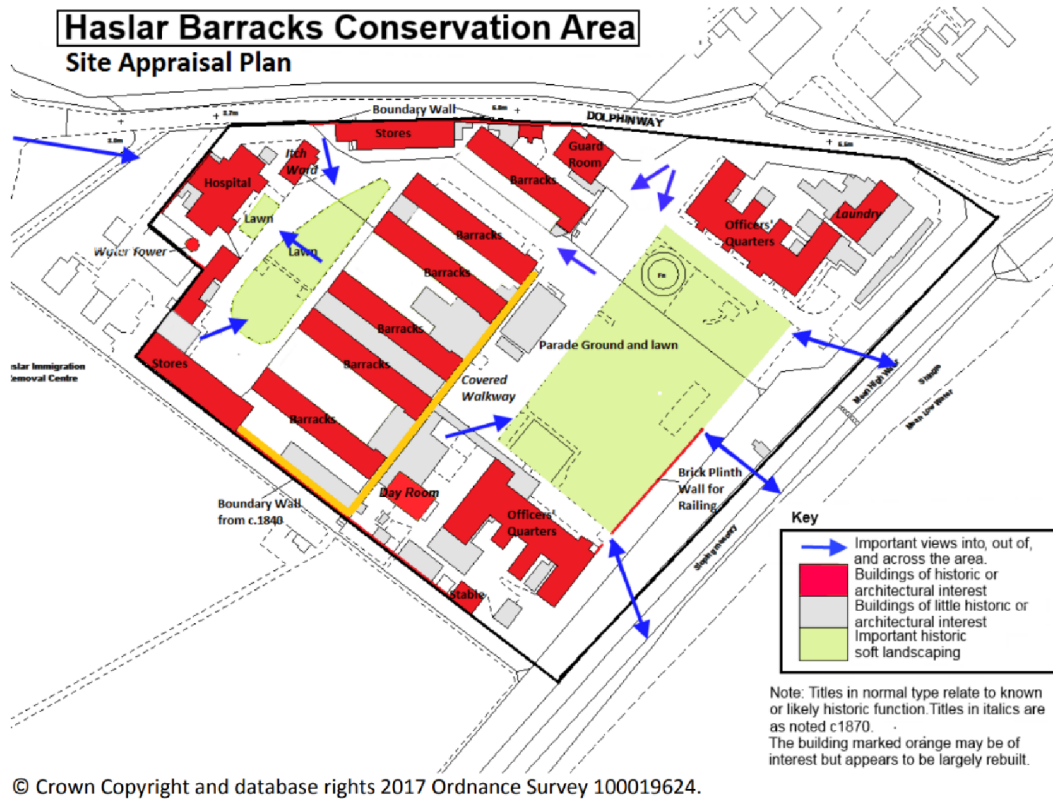


Figure 3-1 – Buildings of historic interest on Haslar Barracks

3.5.2. The Haslar Barracks Conservation Area Appraisal should be read in conjunction with proposed developments at the site to assess the significance of the impact of developing within a Conservation Area.

3.5.3. The following Local Plan policies are relevant to the Conservation Area:

- LP12 – Regard to features of historic interest.
- LP13 – Sensitivity towards locally-listed non-designated heritage assets.

- 3.5.4. It should be noted that it may be necessary to apply for planning permission for some works that would normally be considered 'permitted development' within a Conservation Area.

3.6. BREEAM

- 3.6.1. In 2024, the HO published their BREEAM Policy. The HO requires all projects with a construction value exceeding £500k to undertake a Building Research Establishment Environmental Assessment Method (BREEAM) assessment, with a target of 'Excellent' for new build projects and 'Very Good' for refurbishments.

3.6.2.

The Gosport Local Plan 2038 states that "Planning permission will be granted for non-residential and multi-residential developments over 500 sq/m that achieve a BREEAM standard of at least 'Very Good', or equivalent under the DE1: Sustainable Construction policy. The proposed development project is targeting a score of BREEAM 'Excellent', in line with the HO BREEAM policy and exceeding the Gosport Local Plan 2038 requirements.

3.7. Electrical Capacity

3.7.1.

The electrical load of the Haslar site will be increased due to the electrification of the heating systems. A new [REDACTED] voltage supply is proposed as part of the Energy Centre, requiring a new local sub-station. This has been granted planning permission (Application No. 24/00382/FULL). This is especially important when considering the installation of heat pumps or renewable energy sources, such as solar panels, due to the increased impact these technologies can have on the electrical infrastructure.



4. Towards Zero Carbon

4.1.1. The following strategies concerning energy, transport, and whole life cycle carbon detailed in this section are aimed at reducing the carbon emissions to meet climate change targets, including the Greening Government Commitments. Sustainability is a key aspect for the building services systems design.

4.2. Energy

4.2.1. In light of the UK government’s NZ targets by 2050, Gosport Borough Council’s Climate Change Strategy 2022 outlines their commitment to reaching net zero emissions by 2050. The council has also outlined its objective to be as resilient as possible to the impacts of climate change. This includes interim targets of:

- 67% reduction by 2029/30 in comparison to 2019/20.
- 89% reduction by 2039/40 in comparison to 2019/20.

4.2.2. The Council aim to limit residual emissions as much as possible, adopting the Carbon Hierarchy as shown in Figure 4-1. The proposed development includes the re-use of existing buildings, which reduces the need for demolition and the impact of embodied carbon.

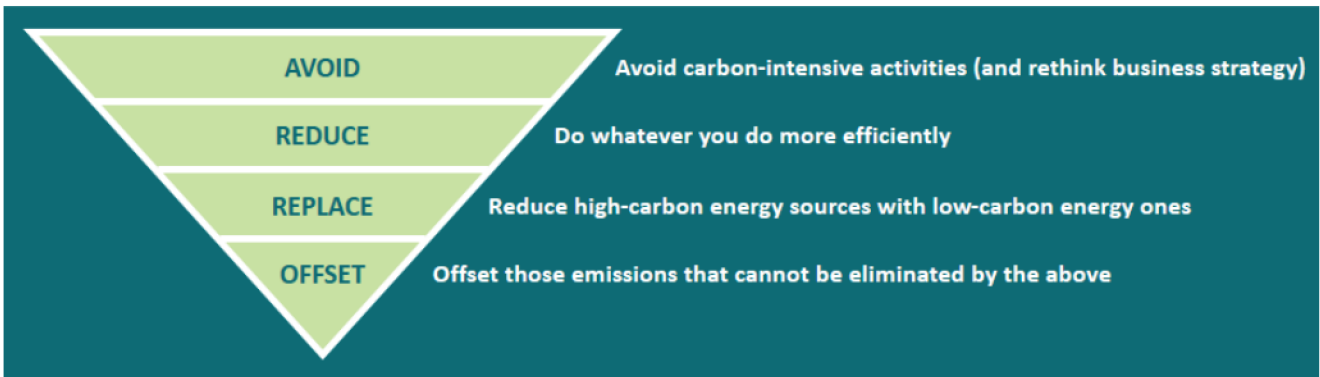


Figure 4-1 – Carbon Hierarchy (Source: Green Restoration Ireland)

- 4.2.3. The proposed development aligns with National Planning Policy Statement 22 (PPS22): Renewable energy (2004)⁵. A percentage of energy to be used in the development will come from on-site renewable energy developments. An energy strategy has been produced as part of this planning application process.
- 4.2.4. The energy hierarchy has been used to maximise efficiency, reducing consumption and therefore, carbon emissions. This approach has been cited as the most cost effective for improving sustainable energy in the built environment.

4.3. Energy Demand

- 4.3.1. IES modelling has been conducted by AtkinsRéalis to assess the baseline and proposed energy demand for the proposed development, demonstrating the impact of proposed energy efficiency measures. These are summarised below. To determine the carbon emissions of the building, the following CO₂ emission factors, derived from the SAP 10.2 conventions, were used:
- Natural Gas: 0.210 kgCO₂/kWh
 - Grid Electricity: 0.136 kgCO₂/kWh
- 4.3.2. Note that these figures only consider regulated carbon emissions and therefore exclude consumption and emissions associated to unregulated loads.

Table 4-1 – Baseline and Proposed Energy and Carbon (Accommodation Blocks)

End-Use	Energy Consumption (kWh/m ² per annum)		Carbon Emissions (kgCO ₂ /m ² per annum)	
	Baseline	Proposed	Baseline	Proposed
Heating	14.02	9.18	1.91	1.25
Cooling	0.00	0.00	0.00	0.00
Auxiliary	17.70	17.70	2.41	2.41
Lighting	9.20	9.60	1.25	1.31
Hot Water	26.65	26.65	3.62	3.49
Total	67.57	63.06	9.19	8.58

- 4.3.3. The Accommodation Blocks are shown to achieve a 6.7% improvement in energy and carbon, in comparison to the baseline.

⁵ [House of Commons Hansard Written Ministerial Statements for 16 Dec 2004 \(pt 2\)](#)



Table 4-2 – Baseline and Proposed Energy and Carbon (CASU)

End-Use	Energy Consumption (kWh/m ² per annum)		Carbon Emissions (kgCO ₂ /m ² per annum)	
	Baseline	Proposed	Baseline	Proposed
Heating	10.37	8.31	1.41	1.13
Cooling	0.00	0.00	0.00	0.00
Auxiliary	12.68	12.61	1.72	1.71
Lighting	6.69	6.60	0.91	0.90
Hot Water	45.53	45.53	6.19	6.19
Total	75.28	73.06	10.24	9.94

4.3.4. The CASU building is shown to achieve a 2.8% improvement in energy and carbon, in comparison to the baseline.

Table 4-3 – Baseline Energy and Carbon (Dining Hall)

End-Use	Energy Consumption (kWh/m ² per annum)		Carbon Emissions (kgCO ₂ /m ² per annum)	
	Baseline	Proposed	Baseline	Proposed
Heating	36.44	33.65	4.96	4.58
Cooling	0.00	0.00	0.00	0.00
Auxiliary	3.60	3.59	0.49	0.49
Lighting	7.07	7.07	0.96	0.96
Hot Water	25.52	25.52	3.47	3.47
Total	72.64	69.84	9.88	9.50

4.3.5. The Dining Hall building is shown to achieve a 3.8% improvement in energy and carbon, in comparison to the baseline.



5. Building Overview

5.1. The Proposed Development

5.1.1. Details of the proposed development are listed below.

- Accommodation Blocks 1, 2 and 3 are new builds and of identical construction. Each block is three stories [REDACTED] and provides accommodation for 122 occupants per block.
- Accommodation Block 4 is a new build which is three stories high providing housing for residents [REDACTED]. The accommodation block consists of [REDACTED] bedrooms and provides accommodation for 106 occupants.
- The Care and Separation Unit (CASU) block is a new single-story building that provides dedicated segregation housing for residents, as well as offices and working space for staff. The CASU block consists of [REDACTED] single bedrooms and a significant number of ancillary rooms to support the CASU function, including Rule 40 / 42 accommodation and associated showers, offices, and an association room.
- The Dining Hall is a new single-story building that provides dining space for the residents. The building includes a dedicated servery and wash-up facilities, with hot and cold food preparation provided from an existing on-site catering facility. The remainder of the building comprises a large seating area and associated WC facilities.



6. Interventions

- 6.1.1. This section will outline the core interventions across the proposed development at the Haslar IRC site and how these contribute towards the improved sustainable building design.

6.2. Building Fabric

- 6.2.1. The following fabric interventions are proposed as part of the proposed development works: roof insulation, external wall insulation [REDACTED], windows, louvres, and doors. The U-values of specified elements will be optimised to reduce energy consumption. The new building fabric in the proposed development buildings will be designed to meet and exceed the requirements of Building Regulations Approved Document Part L2A (England) and BREEAM.

6.3. Heat Pumps

- 6.3.1. The Haslar IRC Phase 2 RIBA Stage 2 report outlines that the provision of heating to all new build elements will be via an array of Air Source Heat Pumps (ASHPs) serving all buildings [REDACTED]. Therefore, there will be no fossil fuel emissions from heating in operation. The building design will support the council's ambition of planning and adapting for the impacts of climate change. The proposed systems are building specific.
- 6.3.2. In all Accommodation Blocks, the district heating system will be supplemented by a Water Source Heat Pump (WSHP) [REDACTED]. Heating in the Dining Hall and CASU block will be provided via the district heating systems [REDACTED].
- 6.3.3. Similarly for the refurbishment works, the Haslar IRC RIBA Stage 2 report outlines the heating provision for each building. Heating will also be provided via ASHPs and WSHPs [REDACTED]. This will be supplemented by local Variable Refrigerant Flow (VRF) systems to meet heating and cooling demand for certain areas. These works will electrify the heating systems, resulting in no fossil fuel related emissions for heating. Modern insulation will be installed in proposed development buildings, ensuring the heat demand will be met with distribution temperatures.
- 6.3.4. All heat pumps will use refrigerants that are CFC free, non-ozone depleting, and non-combustible, with either direct effect life cycle CO₂ equivalent emissions (DELCO) of ≤100 CO₂-eq/kW or a global warming potential (GWP) ≤10, in accordance with BREEAM UK New Construction Version 6 Pol 01 Impact of Refrigerant requirements.
- 6.3.5. The increased electricity consumption associated with this technology will be offset with the renewable electricity generation through the Solar PV. Similarly, by adopting a whole building approach and targeting BREEAM credits associated with building fabric and insulation properties, the heating system can be appropriately sized, maximising operational efficiency and reducing the risk of under or over heating across the site.
- 6.3.6. Where it is impractical to use a low temperature hot water system for heating, electric heating systems will be deployed (e.g. electric radiators or panel heaters).

6.4. Energy Management



- 6.4.1. A new Building Energy Management System (BEMS) is proposed to provide full monitoring and control of building systems and services at the CASU building and four Accommodation Blocks, as part of the proposed development. The Phase 1 RIBA 2 report also includes references to system zoning and controls to minimise energy consumption, with the proposed development works providing an extension of the proposed Phase 1 network. Support will be provided by a BEMS Contractor [REDACTED]. Along with the energy efficiency measures listed in the design proposals, the implementation of a BEMS will contribute to a reduction in energy consumption and associated carbon emissions, in line with the 'Avoid' element of the carbon hierarchy shown in Figure 4-1.
- 6.4.2. The energy metering systems as part of the BEMS will enable at least 90% of the estimated annual energy consumption of each utility to be assigned to the various end-use categories of energy consuming systems. Energy meters, comprising electricity, natural gas, and water, will be connected to the BEMS [REDACTED]. [REDACTED] This complies with BREEAM criteria. Metering will be provided in accordance with CIBSE TM39 Building Energy Monitoring and will ensure that all energy greater than 10% of the total energy usage is individually metered.

6.5. Lighting

- 6.5.1. All luminaires throughout the internal and external spaces of the proposed development works will use energy efficient LED light sources to minimise maintenance and energy consumption. All lighting systems will be designed in accordance with BS12464-1 (2021), BS12464-2 and the CIBSE SLL Lighting Guides. Lighting will be fully dimmable and have DALI control gear with occupancy and timeclock integration.
- 6.5.2. LED sourced lighting is extremely energy efficient relative to fluorescent and other available lighting technology since it wastes very little energy in the form of infrared radiation and emits light directionally.
- 6.5.3. Lighting will be designed to limit glare whilst also limiting the quantity of artificial lighting to meet daylighting requirements. Natural daylight will be maximised wherever possible to reduce reliance on artificial lighting. This is achieved through a combination of room layouts, building form and the specification of glazing used.

6.6. Ventilation

- 6.6.1. Natural ventilation through openable windows will be considered where compatible with the building function, with feasibility assessed on an individual building basis and subject to operational requirements.
- 6.6.2. Where required by HO ventilation standards, mechanical ventilation will be utilised to provide fresh air. Indoor units will incorporate heat recovery to reduce energy demand and operational costs. The noise levels of the proposed mechanical ventilation shall be kept as low as possible to reduce unwanted noise pollution both internally and externally to the building.
- 6.6.3. Automatic opening vents will be specified for smoke ventilation within the Accommodation Blocks. Passive or mechanical smoke clearance systems will be integrated.

6.7. Cooling



- 6.7.1. The building fabric of each building will be designed to meet current standards, reducing the cooling loads. A full TM52 Overheating analysis has been undertaken, confirming that no spaces within the designed building are subject to overheating, and thus no space will require comfort cooling to overcome overheating issues. As a result, there is no current provision for comfort cooling within the proposed development.
- 6.7.2. Direct expansion (DX) systems will be used for IT server rooms, communication rooms and any other essential identified areas within the proposed development in a duty and standby arrangement. Cooling systems shall be designed in accordance with Estate Directorate Technical Standard STD/M/SPEC/047, which states that a new refrigeration system shall have GWP of less than 10 or shall have a Direct Effect Life Cycle CO₂ equivalent (DEL_{CO2}) emission of <100 CO₂-eq/kW.

6.8. Photovoltaics

- 6.8.1. Solar Photovoltaic (PV) panels have been considered for the project to reduce electrical energy consumption from the grid through on-site electricity generation from solar energy. PV panels are complementary to other technologies employed on the project as they displace electrical energy that would otherwise be required from the grid, reducing the carbon emissions associated with electricity usage.
- 6.8.2. As part of the proposed development, the available roof space will be utilised. The overall annual energy production from the Solar PV is 302,400 kWh, with a total peak output of 336 kW. The PV panels will be installed on the available roof space areas positioned to face East and West to maximise solar gain. Solar energy will either be immediately utilised or exported back to the grid. The PV systems design will be subject to any requirements of Building Control & Planning.

6.9. Transport

- 6.9.1. Gosport Local Plan (2021-2038) states that the council is committed to reducing transport emissions as one of its key ambitions. This is supported by 2011 census data indicating that at the Gosport MSOA scale, travel to work mode in this area by car accounts for 58.4% of journeys. This data has informed the expected baseline model of travel, which suggests 14.9% of staff will walk and a further 15.1% will cycle with the remainder undertaking other methods. This model and the targets may be updated 3 months post occupation following surveyance, but the initial target is to reduce private car usage by 10% in the initial five years.
- 6.9.2. Measures to support this 10% reduction include:



Table 6-1 - Proposed Transport Measures

Physical Measures	Staff Measures
<ul style="list-style-type: none"> ▪ Provision of secure cycle parking for staff; ▪ Provision of showers and lockers; ▪ Car parking in line with GBC's parking standards; and ▪ Electric Vehicle (EV) charging provision comprising a dual 22kW charging pole will be provided [REDACTED]. 	<ul style="list-style-type: none"> ▪ Cycling, public transport, and walking information and support. ▪ A Travel Information intranet page or staff noticeboard; ▪ By occasional email update from the Travel Plan Co-ordinator; ▪ Via a Travel Information pack to be prepared and issued to all staff prior to occupation of the development. This is to influence travel patterns at the outset, when staff are considering how their daily journeys will be made. ▪ Cycling and walking maps for the local area and the contact details of local and national cycling organisations, such as Sustrans (a UK charity that promotes walking and cycling and manages the National Cycle Network); ▪ Details of on-site cycle parking; ▪ Timetables and route maps for public transport. This should include isochrone maps showing schedules, journey times and timetable information; ▪ Details for any community travel websites or information portal pages and community forum sites. ▪ Details of pedestrian and cycle routes in the local area; ▪ Information regarding general pedestrian and cycle safety; ▪ Locations of bus stops, the station and bus and rail timetable information; and ▪ Promotion of national travel events such as Cycle to Work Day (www.cycletoworkday.org) and 'Bike Week' (www.bikeweek.org.uk).

6.9.3. To support achieving BREEAM 'Excellent' for each phase, two credits are available for secure projects which undertake a review of the site's proximity to good public transport networks and, where poor, alternative measures have been implemented to help reduce transport-related pollution and congestion. Note that BREEAM credits are not relevant to the planning application.

6.9.4. The following measures have been considered:

- Provision of public transport information in a communal staff area;
- 5% of car parking spaces will be provided with electric vehicle charging points;
- 5% of car parking spaces will be provided for car sharers;
- Secure cycle parking will be provided for staff; and
- Showers and storage facilities will be provided for staff who walk/cycle.

6.9.5. Accessibility to local amenities is also important for reducing transport emissions as it reduces the need for staff to use private vehicles. The table below provides a breakdown of the nearby amenities.



Table 6-2 – Nearby amenities to the Haslar IRC site

	Local Facility / Amenity	Amenity Type	Walking Distance (km)	Walking Time (mins)	Cycling Distance (km)	Cycling Time (mins)	Transit Distance (km)	Transit Time (mins)
0	ATM	ATM	1.6	20	1.9	6	1.6	20
1	Gilkicker Road	Bus stop	0.5	6	0.5	1	0.5	6
2	Joy's of Alverstoke	Coffee shop	1.6	20	1.9	6	1.6	20
3	Haslar Sea Wall Car Park	Car park	0.4	4	0.4	1	0.4	4
4	Little J's Pre School	Childcare	1.1	14	1.1	3	1.1	14
5	One Stop	Convenience store	1.6	20	1.9	6	1.6	20
6	mydentist, South Street, Gosport	Dentist	1.9	24	2.1	8	1.9	24
8	Anytime Fitness Gosport	Gym	2.2	27	2.2	7	2.9	27
11	Anytime Fitness Gosport	Leisure centre	2.2	27	2.2	7	2.9	27
15	Rowlands Pharmacy Stoke Road	Pharmacy	2.1	26	2.1	7	2.1	26
16	Alverstoke Post Office	Post office	1.6	20	1.6	6	1.6	20
17	Haselworth County Primary School	Primary School	2	24	2	6	2	24
18	The Fighting Cocks, Alverstoke	Pub	0.4	5	0.4	1	0.4	5
24	Portsmouth Harbour	Train station	2.7	29	2.8	14	2.7	29



6.10. Reduce Water Consumption

- 6.10.1. The HO's Water Strategy outlines a commitment to improve water consumption reduction by more than the 4% reduction achieved in 2014-15, in comparison to 2009-10 levels.
- 6.10.2. The HO project will conserve water by promoting water efficiency, water recycling and Sustainable Drainage Systems (SuDS). The development has ensured that all new fittings and controls are to be specified to best practice standards to ensure that water consumption is minimised. This includes taps with sensors for automatic shut off and flow control.
- 6.10.3. Any building water demands which exceed 10% of the building's total water demand shall be sub-metered to monitor water usage and connected to the BEMS. Water meters will be specified to domestic water pipework to allow for management and monitoring of water use in the building. This will encourage a reduction in water use by identifying areas of high usage and investigating potential causes. Water meters will be connected to the BEMS, ensuring leak detection is available, reducing unintended water consumption. This meets the BREEAM requirements for water management.

6.11. Reducing Whole Life Carbon

- 6.11.1. Through consideration of not only operational carbon but whole-life cycle carbon emissions, the full embodied impact of a building can be identified. This allows for a more accurate representation of the asset's impact.
- 6.11.2. A Life Cycle Assessment (LCA) has been undertaken in accordance with EN 15978:2011 at RIBA 2 to satisfy the BREEAM V6 New Construction requirements for the buildings under the proposed development.
- 6.11.3. The life cycle assessment table below included the following life cycle stages in accordance with EN 15978:2011 and EN 15804:2012.

Table 6-3 – Life cycle assessment stages

Life Cycle Assessments	Life Cycle Stages
<ul style="list-style-type: none"> ▪ Superstructure Options Appraisal ▪ Substructure and Hard Landscaping Options Appraisal ▪ Superstructure Benchmark 	<ul style="list-style-type: none"> ▪ A1-A3 Construction Materials A4 Transportation to site ▪ A5 Construction/installation process ▪ B4-B5 Material replacement and refurbishment ▪ C1-C4 End of life

6.12. Proposed Development

- 6.12.1. The assessment will use One Click LCA as a tool to calculate the total life cycle impact during 60-year service life.
- 6.12.2. The LCA Options Appraisal Report confirms that the proposed development at Haslar IRC is set to achieve 5 credits under the Mat01 LCA credit at RIBA Stage 2, however this has not yet been completed.

7. Nurture Health & Wellbeing

7.1. Health, Wellbeing and Design Quality

- 7.1.1. Health is a core design aspiration for the Haslar IRC, among supporting wellbeing and ensuring quality of spaces. Inclusive environment is a key element to enhance the IRC facility to provide better well-being, safer and secure accommodation facilities and to meet the diverse needs of the residents reflecting socio-economic, physical, emotional, intellectual and/or social characteristics. The design focuses on providing upgraded facilities and maintaining the open spaces for recreational and exercise purposes.
- 7.1.2. A range of design measures have been incorporated to address the health and wellbeing of the occupants, visitors, and other stakeholders for the proposed development. The design of the site has integrated spaces for health promotion, such as recreational areas and a [REDACTED] garden.

7.2. Air Quality

- 7.2.1. The national policy framework for air quality is outlined by The Air Quality Strategy for England, Scotland, Wales, and Northern Ireland 2007. Improving air quality is impacted by the release of gases and particles into the atmosphere and is cited by the government as 'essential for life, health, the environment and the economy'⁶. The Government must act to tackle air pollution which shortens lives. Nitrogen Oxides which include nitric oxide and nitrogen dioxide can produce acid rain, deplete the ozone layer, have detrimental impacts on health, and are potent GHGs. Gosport Borough Council are particularly focused on this GHG due to the high level of car dependence for travelling to work with private vehicle usage.
- 7.2.2. By utilising zero-carbon heating including heat pumps and planning the Haslar IRC site to minimise private car journeys by encouraging users to cycle or use public transport more, the site is supporting the reduction of harmful substances alongside other GHGs like carbon dioxide, released by burning fossil fuels, being released into the local atmosphere. This contributes towards improving air quality standards.
- 7.2.3. Regarding the indoor air quality, Mechanical Engineers have confirmed via letter that the requirements to satisfy Hea 02: indoor air quality have been met. This includes Volatile Organic Compounds, acceptable Formaldehyde levels, and the BS EN 13999 adhesives regulations have been satisfied.
- 7.2.4. An air quality assessment has been conducted, with the assessment confirming that the impacts to the air quality from the proposed development are not considered significant and not a planning constraint.

7.3. Daylighting



- 7.3.1. Reducing operational energy is key to achieving NZ within estates. The Haslar IRC site has been designed to achieve the benefits of incorporating natural lighting such as improved wellbeing and reduced demand for heating. Although, these benefits should be balanced with the security and cooling demands of the building along with other issues. The HO site has been designed in line with the BREEAM Daylighting criteria and this has been considered throughout the design phase.

7.4. Overheating

- 7.4.1. Passive cooling and ventilation strategies have been incorporated to help mitigate overheating. The development has undertaken overheating analysis which will inform decision-making. The target winter design temperature is 19-21°C, which will be achieved through mechanical ventilation to comply with the requirements of HO standards to limit temperatures.

7.5. Reduce Light Pollution

- 7.5.1. Light pollution will be reduced through sensitive external lighting design. Strategies include directional lighting design, avoiding light spill that causes unwanted light pollution. Recommended and best practice lux levels will be used to avoid over illuminance.
- 7.5.2. The CPRE 'Night blight' website shows areas of light pollution and dark skies in England. The area is already subject to a relatively large area of bright light radiance associated with the Haslar Hospital adjacent. However, the design team are aiming to mitigate further increases further by complying with the BREEAM criteria.

7.6. Acoustics

- 7.6.1. The NPPF emphasises the need to mitigate and reduce adverse impacts on health and quality of life from unacceptable levels of noise incurred by new developments including using planning conditions, where appropriate.
- 7.6.2. Gosport Borough Council's Local Plan (2021-2038), Policy LP10 (Design), requires proposals to avoid causing harm in terms of the following:
- loss of light, privacy or outlook;
 - noise, light pollution, vibration, smell, or air pollution; or
 - other adverse impacts.



- 7.6.3. Policy LP46 outlines the importance of considering noise pollution and the detrimental impact this can have on locals and wildlife.
- 7.6.4. Gosport Borough Council have specifically considered noise-related guidance within the 'Managing Development Delivery 2014 Adopted Document' and therefore, this guidance has been absorbed during the design process. Policy CC06: Noise 1 of the Development Management Policies (June 2013) sets out the criteria that development proposals must meet in relation to noise impacts arising from commercial uses. Noise emission limits will be set according to local authority policy and established environmental assessment methodology based on our measured environmental noise survey.
- 7.6.5. The noise levels various building areas will comply with are summarised below.

Table 7-1 – Noise Criteria for the Proposed Development

Room	Upper indoor ambient noise level, LAEQ 30min dB
Toilets	45
Bedrooms	35
CASU	40
Circulation Spaces	40
Ancillaries (e.g. Laundry)	60
Offices	35-40



8. Towards a Circular Economy

- 8.1.1. The circular economy is defined in the London Environment Strategy report⁷ as “an economic model in which resources are kept in use at the highest level possible for as long as possible to maximise value and reduce waste, moving away from the traditional linear economic model of ‘make, use, dispose’.
- These principles are being investigated concerning materials and occupants’ behaviour.”
- 8.1.2. This development supports the UK’s transition to a low carbon circular economy by implementing and investigating circular economy principles.
- 8.1.3. Haslar IRC is currently looking to achieve the BREEAM material credits including material efficiency and designing for durability, as well as the waste credits looking at construction waste management, operational waste, and design for disassembly and adaptability amongst others. These credits will demonstrate the project’s proactive approach towards enhancing circular economies within the project life cycle.

8.2. Design

- 8.2.1. The design is based on a flexible and an adaptable plan. This means the development can be easily adapted to meet the future needs of the building, without demolishing and re-building sections.
- 8.2.2. Other strategies include:
- Designing for end-of-life disassembly, re-use, and recycling.
 - Reducing cut-off waste,
 - Building in layers so that different elements of the building can be maintained and replaced; and
 - Reusing materials.
- 8.2.3. A climate change adaptation strategy has also been developed for the proposed development. This provides hazard identification and risk management for a range of climate-related risks, including temperature rise, stronger winds, flooding and increased frequency of extreme weather events. The assessment covered the installation of building services and renewable systems, as well as structural and fabric resilience aspects. The strategy includes measures to mitigate against the risks. These are summarised below:
- Flooding – Appropriate attenuation to be specified, as well as flood-resistant flooring.
 - Storms – Superstructure to be designed to allow for future predicted wind loads and durable weather-resistant materials to be used.
 - Heat waves – Effective ventilation systems with automatics controls, with passive design and natural ventilation explored. Heat deflecting windows with glare control
 - Drought – Specification of a water infiltration system around the building exterior and rainwater collection systems.

⁷ Greater London Authority, 2018: London Environment Strategy. [Online] Available at <https://www.london.gov.uk/programmes-and-strategies/environment-and-climate-change/london-environment-strategy>

- 8.2.4. An update will need to be provided during the Technical Design stage demonstrating how recommendations or solutions proposed at Concept Design have been implemented where practical and cost effective.

8.3. Material Selection

- 8.3.1. Material consumption is an important consideration when aiming to reduce the global, social, and environmental impact of the consumption of resources by using sustainably produced and locally-sourced products. The LETI have collaborated with RIBA, the GLA, IStructE, and the UKGBC to produce the Embodied Carbon Primer. The document recommends targets are assessed including elements required in RICS Professional Statement Whole Life Carbon Assessment for the built environment.
- 8.3.2. Products or materials known to be deleterious to the environment, the health and safety of building occupants, or the long-term durability of the building should not be specified. Construction systems and materials will be selected and sourced to achieve identified BREEAM credits. Architectural building materials and components forming the part of the design will comply with Local Authority Codes and Building Regulations, British Standards, and other regulations applicable to the works, together with relevant Statutory Rules, Regulations, Byelaws, and other enforceable instruments in both the design and execution of the installation.
- 8.3.3. Materials have and will continue to be selected based on whole life carbon and whole life cost considerations. A whole life carbon assessment has been undertaken for A1-A5 upfront embodied carbon, excluding non-fixed FF&E, external works outside of the building footprint, and renewable electricity generation. This is combined with supporting targets of materials being reused and materials being designed for re-use. Embodied carbon is a key element of considering and measuring the carbon over the whole life of a development to understand the true impact of the project.
- 8.3.4. The environmental impacts from construction products will be assessed through a building life cycle assessment. This will encourage measures to optimise construction, product consumption efficiency, and the selection of products with a low environmental impact over the life cycle of the building.

8.4. Waste

- 8.4.1. Waste generation and disposal contributes significantly to carbon emissions and therefore facilitation of recycling and sustainable methods of construction are being addressed within the HO design process. During construction, a Site Waste Management Plan will be in place to maximise opportunities for the minimisation, re-use, and recycling of waste materials. Specific measurable targets will be in line with BREEAM requirements. Recycling facilities have been identified in a waste storage room. As noted in the Materials section above, materials should be designed for re-use and materials should consist of reused materials, thereby reducing waste. This approach will be designed in line with the Waste Hierarchy, looking to prevent, minimise, reuse, recycle, recover, or dispose of site waste.



9. Create a Strong & Inclusive Community

9.1. Management

- 9.1.1. To optimise the final building design, the project is adopting an integrated design process and robust stakeholder engagement. The stakeholder consultation will identify stakeholder needs, thus maximising the benefits and acceptability of the project in operation to its users and those affected by it. This will also enable the project to meet performance expectations to minimise the performance gap. Ongoing facilities management and handover has been a consideration during the design process so the site can be utilised efficiently upon completion.
- 9.1.2. AtkinsRéalis have been appointed as Government Soft Landings Champions to support the effective management of the project and facilitate collaboration between core stakeholders.

9.2. Considerate Contractors' Scheme (CCS)

- 9.2.1. Due to the secure nature of the site and associated security constraints, the project is unable to be registered with the Considerate Contractor's Scheme (CCS). However, the main contractor will follow the key principles of the CCS scheme to ensure, where possible, so that any potential nuisance construction process, noise, and access issues will be minimised.
- 9.2.2. To reduce the health and safety risk to occupants, contractors, and maintenance teams, risk workshops have taken place throughout the design process and will continue to take place as the design progresses.

9.3. Land Use and Ecology

- 9.3.1. In terms of land use and ecology, the goal is to conserve and enhance the biodiversity of the local area by conserving and enhancing areas valued for their diversity of wildlife, habitats, and landscape value.
- 9.3.2. The site is located on previously occupied land. This reclamation and re-use of a previously developed site aligns with UK Government Policies to increase the uptake of brownfield land and allows the preservation of existing biodiversity by reducing reliance on greenfield land.
- 9.3.3. The relevant ecology survey work has been carried out on the site including an ecological appraisal by a suitably qualified ecologist. This included a desk study, Phase 1 Habitat Survey, and a preliminary scoping survey for protected species, including internal and external building inspections for bat roost potential. The aim is to enhance green areas, protect its biodiversity, and connect natural environments.
- 9.3.4. Consequently, the application site is being designated a Solent Wader Brent Goose Core Site. Any development requires land mitigation agreement with Natural England as a planning condition.
- 9.3.5. The site is not located within a sensitive site, and a Habitats Regulations Screening Assessment (HRSA) was undertaken in 2025. This concluded that the proposed development is unlikely to have any significant impacts on the nearby Solent & Isle of Wight Lagoons Special Area of Conservation (SAC) and Portsmouth Harbour Special Protection Area (SPA). The assessment supported the conclusion that the development can proceed without adversely affecting the integrity of the SAC and SPA.

9.4. Flood Risk



- 9.4.1. The proposed development aligns with National Planning Policy Statement 25: development and flood risk. Flood risk has been considered at all stages of the development process to reduce any future damage to property and loss of life. The report has also been produced in accordance with the guidance detailed in the NPPF.
- 9.4.2. The site would be operated with minimal risk from flooding and would not increase flood risk elsewhere. The development should therefore not be precluded on the grounds of flood risk and surface water or foul drainage. However, the application site is located within Flood Zone 3 (high risk).
- 9.4.3. Suggested mitigation measures include:
1. Sequentially develop the site with proposed buildings to be located outside of Flood Zone 3 as a minimum and Flood Zone 2 if possible.
 2. Set finished floor levels for proposed sleeping accommodation 0.9m above existing ground levels to the north of the building.
 3. Build in a floor resilient manner [REDACTED].
 4. Adoption of a surface water management strategy.
 5. Set finished floor levels above external levels.
 6. Produce a Flood Evacuation Management Plan.
- 9.4.4. The Site is at minimal risk of tidal, surface water, and groundwater flooding, as detailed in the preliminary Flood Risk Assessment undertaken by 1st Horizon (Ref: 8607-R09 dated February 2025).

10. Social and Economic Sustainability

10.1. Employment Opportunities

- 10.1.1. The contractor will be encouraged to use apprentices and local workforce during the construction process. [REDACTED] The design team are in the process of discussing social value opportunities on the project, including locally sourcing work and skills, with the Main Contractor.

10.2. Community Engagement

- 10.2.1. There has been opportunity for existing nearby stakeholders and residents in the area to engage in the development of the landscape proposals. This encourages collaboration and relationship building between residents, as well as helping the community to build a sense of ownership with the proposal.
- 10.2.2. The community engagement event during the pre-application stage influenced the design in the following key ways:
- The accommodation blocks are set away from Fort Road to avoid interference with the neighbourhood.
 - A community area has been proposed to meet the requests of the residents of this area.
 - The design includes a visual barrier between the residential area and the proposed development.
 - The external lighting strategy will be considered in the proposed development design.
 - The access to the sports area will be restricted and sports pitch will be used during agreed hours in a day to prevent noise disruption to the surrounding areas from the sports activity.



- 10.2.3. This is likely to improve the relationship with the development and local community, reducing the risk of local objections or complaints.

11. BREEAM Certification

- 11.1.1. The project is seeking to obtain third-party environmental certification using the BREEAM scheme, as per the Home Office BREEAM Strategy. This will inform the holistic sustainable design of the development and the framework provided by the BREEAM categories in the stipulated framework for use by the HO for projects over £500k.
- 11.1.2. The proposed development will be assessed against BREEAM New Construction Version 6 - targeting BREEAM 'Excellent'.
- 11.1.3. Opportunities to influence the holistic sustainability of the building have been identified following the Pre-Assessment workshops, facilitated by the BREEAM Assessor, with input from members of the design team.

Table 11-1 – BREEAM assessment for the proposed development on the Haslar IRC site

BREEAM Certification Scheme	Current targeted score
UK New Construction Version 6	'Excellent' – 75.90%

- 11.1.4. The assessment currently has a comfortable buffer over the minimum 70% requirement for BREEAM 'Excellent', with the proposed development exceeding the recommended 5% buffer value.
- 11.1.5. Some credits required action prior to the end of RIBA Stage 2. All actions relating to these 'Early Action Credits' have been completed to ensure that there is maximum scope for achieving the specified BREEAM target. The assessment is on track to achieve the targeted BREEAM rating.



12. Conclusion

12.1.1. This sustainability statement has outlined how the proposed development has considered sustainability throughout the design, as summarised in Table 9-1. The development fully aligns with the NPPF principles and supports the UK’s net zero commitments.

12.1.2. The development demonstrates a robust approach to sustainability, delivering environmental responsibilities, social considerations and economic benefits while meeting national policy objectives.

Table 12-1 – Haslar IRC sustainability considerations, in line with Crown Development requirements

Sustainability Consideration	Haslar IRC Conformance
Planning	<ul style="list-style-type: none"> The requirements of the Crown Development are being followed. The proposed development is in accordance with Gosport Borough Local Plan 2038.
BREEAM	<ul style="list-style-type: none"> A rating of BREEAM 'Excellent' (<70%) is targeted for the proposed development assessments.
Energy	<ul style="list-style-type: none"> Low carbon heating (heat pumps), energy efficiency measures (LED lighting, ventilation upgrades, BEMS, fabric improvements), and local renewable generation (solar PV panels) are proposed in the designs for both phases to reduce energy consumption, in line with the HO’s energy reduction target. All heating and hot water will be supplied by non-combustion and non-fossil fuel systems. The Carbon Hierarchy will be adopted, prioritising avoiding energy consumption.
Transport	<ul style="list-style-type: none"> Two car parking spaces will be provided with electric vehicle charging points, with an additional 5% of car parking spaces provided for car sharers. Secure cycle parking will be provided for staff. Showers and storage facilities will be provided for staff who walk/cycle, incentivising active transport.
Water	<ul style="list-style-type: none"> The development has ensured that all new fittings and controls are to be specified to best practice standards to ensure that water consumption is minimised. Water meters will be specified to domestic water pipework to allow for management and monitoring of water use in the building.
Whole Life Carbon	<ul style="list-style-type: none"> LCA will be undertaken on the proposed development, quantifying the embodied carbon of building components. Options appraisals will be conducted on the sub-structure and superstructure, optimising material selection. Responsible construction practices will be adopted for the proposed development.
Health and Wellbeing	<ul style="list-style-type: none"> The design of the site has integrated spaces for health promotion, such as recreational areas and a community garden. An air quality assessment has been conducted, confirming that the impacts to the air quality from the proposed development are not considered significant.



	<ul style="list-style-type: none"> ▪ The Haslar IRC site has been designed to achieve the benefits of incorporating natural lighting, improving occupant wellbeing. ▪ Passive cooling and ventilation strategies have been incorporated to help mitigate overheating. ▪ Measures have been incorporated into the designs to limit acoustic levels to the requirements imposed by planning conditions, BREEAM requirements, and the requirements of the Pollution Control officer. ▪ The designs will conform to accessibility requirements of BS 8300-1 & BS 8300-2 and, as a minimum, Building Regulations Approved Document M.
Circular Economy	<ul style="list-style-type: none"> ▪ The designs allow the buildings to be easily adapted to meet the future needs of the building, without demolishing and re-building sections. ▪ During the Construction stage, a Site Waste Management Plan will be implemented to maximise opportunities for the minimisation, re-use, and recycling of waste materials.
Strong and Inclusive Community	<ul style="list-style-type: none"> ▪ The project is adopting an integrated design process and robust stakeholder engagement. ▪ AtkinsRéalis have been appointed as Government Soft Landings Champions to support the effective management of the project and facilitate collaboration between core stakeholders. ▪ The main contractor will follow the principles of CCS and will ensure where possible that any potential nuisance construction process, noise, and access issues will be minimised. ▪ Risk workshops have taken place to reduce the health and safety risk to occupants, contractors, and maintenance teams. ▪ The works will conserve and enhance the biodiversity of the local area by conserving and enhancing areas valued for their diversity of wildlife, habitats, and landscape value. The site is designated a Solent Wader Brent Goose Core Site. ▪ The proposed development has minimal risk from flooding and would not increase flood risk elsewhere through mitigation measures. ▪ The contractor will be encouraged to use apprentices and local workforce during the construction process. ▪ Community engagement during the pre-application process has influenced the application design.



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