CUSHMAN & WAKEFIELD

# PLANNING STATEMENT

**Haslar IRC**

**Home Office**

DEVELOPMENT & PLANNING | BIRMINGHAM

MAY 2026

Better never settles



# Report Disclaimer

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| Version | Prepared By | Approved By | Date |
|---|---|---|---|
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# 1. Introduction

1.1 This Planning Statement has been prepared by Cushman & Wakefield (C&W) on behalf of the Home Office (HO) in support of an Outline Planning Application (OPA) with all matters reserved except access made under the Crown Development Route (CDR) for the expansion of the Haslar Immigration Removal Centre (IRC) on the Haslar Peninsula (hereafter referred to as the 'Site'), together with the necessary associated site infrastructure. A full description of development is set out in section two of this statement.

### The Applicant

1.2 The HO ('the applicant') is the lead Government department for immigration and passports, drugs policy, crime, counterterrorism and police. Immigration Enforcement (IE) is the area of the Home Office responsible for preventing abuse of the immigration system, increasing compliance with immigration law, pursuing those here illegally and protecting the vulnerable. IE works with partners across law enforcement, wider government, the private sector, and the voluntary sector to achieve this.

1.3 The HO is responsible for the provision and management of Immigration Removal Centres (IRCs), which form part of IE's infrastructure. The proposed development is made in response to a need to expand IRC provision within the United Kingdom.

### Supporting Documents

1.4 This Planning Statement should be read in conjunction with the accompanying plans submitted as part of the application, as well as the following documents, which have been prepared to address all the material planning considerations.

1.5 Plans submitted for approval:

- Site Location Plan
- Existing Site Plan
- Proposed Site Access Plan

1.6 Plans for Information[1]:

- Indicative Site Layout
- Indicative Site Development Parameters
- Indicative Elevations and Sections
- Indicative Floor Plans and Roof Plans
- Indicative Landscaping Plan
- Indicative Lighting Plan

1.7 Documents (referred to in this Statement)

- Air Quality Assessment by First Horizon
- Archaeological Desk Based Assessment by Wessex Archaeology

[1] These plans contain official sensitive information and are not submitted for approval or public consideration but to assist the decision maker in understanding the proposed development.

- Biodiversity Net Gain Assessment and Metric by First Horizon
- Contaminated Land Assessment - Phase 1 Ground Investigation Report (including UXO Risk Assessment) by First Horizon
- Design and Access Statement by AtkinsRealis
- Ecological Impact Assessment by First Horizon
- Environmental Impact Assessment (EIA) Screening Decision
- Energy Statement (sustainability statement) by AtkinsRealis
- Flood Risk Assessment and Drainage Strategy (including Flood Evacuation Management Plan and Coastal Modelling Report) by First Horizon
- Habitat Regulation Assessment Screening Report by First Horizon
- Heritage Impact Assessment by Wessex Archaeology
- Local Community Impact Assessment by AtkinsRealis
- Landscape and Visual Impact Assessment by UBU Design
- Lighting Strategy and Assessment by AtkinsRealis
- Nitrate Neutrality Assessment by First Horizon
- Noise Impact Assessment by First Horizon
- Outline Environmental Management Plan by AtkinsRealis
- Planning Obligations – Draft Heads of Terms
- Transport Assessment and Travel Plan by Stantec
- Tree Survey and Arboricultural Impact Assessment by First Horizon
- Statement of Community Engagement by Cushman & Wakefield
- Statement of National Importance by Home Office
- Waste Management Statement by AtkinsRealis

**Structure of Planning Statement**

1.8 This report is structured as follows:

- Section 2 provides the background to the site and its context within the surrounding area and an overview of the planning history of the site, and the pre-application engagement process.
- Section 3 provides a summary of the development proposal.
- Section 4 sets out the relevant planning policy framework for the site.
- Section 5 explains the need for additional IRC accommodation.
- Section 6 provides an assessment of the material planning considerations arising from the proposal.
- Section 7 presents our conclusions with respect to the proposals.

# 2. Background

2.1 This section describes the site and the immediate surrounding area, together with a summary of the relevant planning history and pre-application discussions that have taken place with Gosport Borough Council, the Local Planning Authority ('the LPA').

### The Site

2.2 The site is owned by the applicant and extends to 4.54 hectares and comprises the existing Haslar IRC and associated operational land, which is located on the Haslar Peninsula. The site is broadly level with a gentle slope from north to south (seawards). A plan of the site is shown below at figure 2.1.

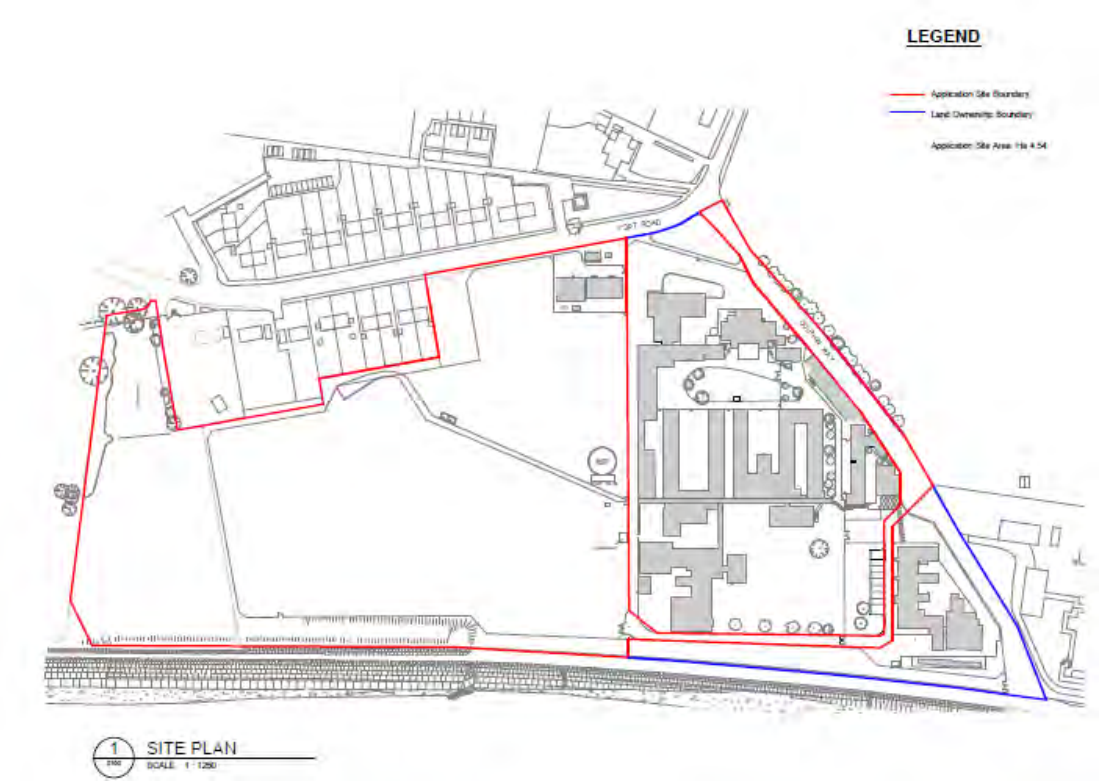



Figure 2.1 – Site Plan

2.3 The main entrance to the Site is off Dolphin Way with a disused secondary access off Fort Road. Access to the existing car park, which will be separate from the secure IRC, is off Fort Road.

2.4 Within the southwest of the Site, there are disused pitches now overgrown with grass and scrub, a small, public car park (Haslar Sea Wall Car Park) and a grassed area (previously used as a car park) through which the Coastal Path runs[2]. Within the northeast, there is Dolphin Way (a private road owned by the Home Office) and the Haslar IRC complex comprising buildings, hardstanding, landscaped areas and a site access road leading onto Dolphin Way.

[2] The grassed area south of the existing car park was previously a car park and is currently being used for temporary contractor car parking associated with the refurbishment works to the existing Haslar IRC.

2.5 The IRC comprises of buildings that are red brick, nearly all single storey, and retain the original plan form of the former Barracks. Further ancillary buildings exist behind the primary buildings. There are no statutory listed buildings on site.

2.6 Haslar was historically an army barracks, but converted to an army hospital in 1864, before becoming the home of the Royal Engineers in 1892. The site was then occupied by the Royal Army Ordinance Corps before it changed to a Youth Offenders' Centre in the 1950s and finally became an Immigration Removal Centre.

### The Surrounding Area

2.7 North of the Site lies Haslar Terrace, a residential area. To the east and south is the Solent. The Gosport & Stokes Bay Golf Club and Fort Monkton are located to the southwest. To the west and northwest are Fort Road and residential properties. The broader landscape is predominantly residential, recreational, and marine.

### Site History

2.8 Haslar was historically an army barracks but converted to an army hospital in 1864, before becoming the home of the Royal Engineers in 1892. The site was then occupied by the Royal Army Ordinance Corps before it changed to a Youth Offenders' Centre in the 1950s and finally became an Immigration Removal Centre, which shut in 2015.

2.9 In planning terms, the site's extant use is Use Class C2A (secure residential institution).

2.10 The HO made the decision to open the former IRC in 2022 and, following extensive refurbishment works, the IRC is expected to reopen in 2027. In accordance with the findings of external reviews and reports, the operational capacity of the IRC post refurbishment is to be reduced to a maximum of 130 detained persons.

### Site Planning History

2.11 The planning history of the site is summarised below in two sub-sections. Firstly, historic planning applications and decisions relating to development on the site prior to the closure of the IRC in 2015. Secondly, the planning applications relevant to the refurbishment of the IRC.

#### Historic Applications

2.12 Several planning applications relevant to the site have been identified on the Gosport Borough Council Planning website. These are dated from the 1970s onwards and include minor changes to existing buildings and addition of fences and roof replacements.

#### Applications for IRC Refurbishment

2.13 The refurbishment of the IRC required a range of works to bring the buildings up to modern standards and the design requirements set out within external reviews and reports. Whilst a significant amount of the work could be carried out utilising permitted development rights afforded to Operational Crown Land, some works required planning approval (planning permissions and prior approvals). Appendix B includes a table that summarises the works undertaken and the relevant applications or permitted development rights used.

2.14 Prior to work being undertaken, the HO held pre-application discussions with the LPA. On 18th January 2023, the LPA confirmed informal agreement in writing that the majority of refurbishment works were permitted development.

### Pre-application Engagement

2.15 The HO requested an EIA Screening Direction from the Ministry for Housing Communities and Local Government (MHCLG) for the redevelopment and extension of Haslar IRC. A Screening

Decision was issued on 15th May 2025, which confirmed the proposed development, including the refurbishment works, did not comprise EIA development.

2.16 The HO has carried out extensive engagement with stakeholders (including the LPA, statutory consultees, national and local politicians and local residents).

2.17 A Statement of Community Engagement (SCE) is submitted with the application and sets out how the applicant has engaged with stakeholders about the proposed development. It summarises the process by which engagement has taken place, outlines the key meetings and discussions, and sets out the actions resulting from these. Specifically, where changes have been made to the proposal and, where changes have not been made, the reasoning behind the decision is stated.

2.18 This sub-section focusses specifically on the pre-application discussions with the LPA (ref:P.103/026/25) and summarises the key matters identified during the pre-application process. This Statement explains how each matter is addressed within section 5 – Planning Considerations.

2.19 The key planning matters identified by the LPA are:

- Extant Use/Baseline - The continued use of the site as an IRC is established.
- Principle of Development – The proposed development would be acceptable in principle provided it is in accordance with the other policies of the adopted Local Plan. The regeneration of urban sites is a key priority for the Council as is supporting local employment opportunities.
- Heritage – The site adjoins (and is accessed through) the Haslar Barracks Conservation Area. The Council will seek to ensure the historic environment is preserved and, where possible, enhanced. The location of new buildings within the site have been amended in response to the heritage matters raised.
- Design – The supporting Design and Access Statement (DAS) should explain how the proposed development relates to the surrounding area including the adjoining Conservation Area. Careful consideration will need to be given to the proposed scale, setting, layout, massing, appearance and landscaping. An amendment to the location of accommodation blocks was recommended due to impacts on the Conservation Area. Concern was raised regarding the design of the proposed accommodation blocks. The location of new buildings within the site have been amended in response to the heritage matters raised.
- Highway and Access – safe access for cyclists and pedestrians is required, as well as justifiable car parking provision and appropriate improvements to public transport access.
- Flood Risk and Drainage – Tidal flooding and surface water flooding were highlighted as risks that require assessment. The applicant will need to demonstrate the development is necessary and can be made safe from all forms of flooding. The Sequential Test and Exception Test must also be passed.
- Ecology – Development on a Primary Site in the Solent Waders and Brent Goose Strategy requires suitable mitigation. An up-to-date ecology assessment is required and 10% Biodiversity Net Gain (BNG) must be achieved. The applicant must also demonstrate how nutrient neutrality is achieved.
- Open Space and Coastal Path – Requests information regarding on-site amenity space and recommends improvements to the King Charles III England Coastal Path are discussed with Natural England. The proposed development amends the route of the path between Fort Road and the coast. The amended route will follow the western edge of the site whereby the path will be formalised and separated from the car park to improve the safety of pedestrians.

- Ground conditions and contamination – recommends pre-application engagement and the production of site investigations that meet UK practice standards.

- Skills and training – the development should make a positive contribution towards skills and training through the construction and operational phase of the development.

2.20 All planning matters discussed with the LPA, statutory consultees and key stakeholders are discussed within section 6 of this report.

# 3. The Proposed Development

3.1 The description of development is

*"Outline Planning Application with all matters reserved (except for access) for the expansion of Haslar IRC comprising the development of new accommodation blocks and ancillary supporting accommodation, the conversion and expansion of existing site infrastructure including internal roads, demolition of existing structures, minor amendment to England coastal path to accommodate the creation of additional car parking, landscaping and associated site infrastructure."*

3.2 Whilst detailed permission is not sought for the proposed site layout and internal floorspace, an indicative set of plans accompanies this application (for information) to demonstrate how the scale of development proposed can be accommodated on the site and to enable a robust assessment of impacts to inform the decision-making process. The application site has three existing vehicular access points and all three are to be retained with no amendments proposed.

3.3 The proposed development is explained in more detail below in the following sub-sections:

- Use
- Scale of Development
- Operation
- Security Arrangements

### Use

3.4 The proposal is to extend the existing IRC together with additional site infrastructure to accommodate the operational requirements of the expanded facility. The existing and proposed use is Use Class C2A.

### Scale of Development

3.5 The outline planning application does not proposed details of layout and scale for approval. However, the indicative layout and floor plans identify how the application site could accommodate the development requirements within the developable area of the site as shown on the indicative development parameters plan. Table 3.1 shows the operational capacity of the IRC (to be opened in 2027) and the operational capacity of the expanded IRC together with anticipated development parameters based upon operational requirements for the site.

| | Existing IRC (Opening 2027 and outside the application red line) | Proposed IRC Extension |
|---|---|---|
| Number of detained persons (capacity) | 130 | Up to 470 (resulting in a 600 bed IRC) |
| Staff (shift work pattern) | 149 | 265 (414 in total) |
| Total Floorspace (sq. m. GIA) | 5,300 sq. m. | 3,258 sq. m. GIA |

| | | |
|---|---|---|
| Height of buildings (m) | 10.47 (multifaith building) | 12m |
| Car/Cycle Parking | 93 car spaces (including 43 car spaces on Dolphin Way and 50 on Haslar Sea Wall Car Park – 20 existing spaces retained for public use) | 209 additional car spaces (302 in total) (including 30 public spaces within Haslar Sea Wall Road Car Park, 15, disabled spaces, 13 active electric charging and 54 passive bays)<br>14 motorcycle spaces<br>26 cycle spaces |
| Average Daily Vehicle Movement | IRC to open 2027 | 774 movements |

3.6 The parameters of the proposed IRC extension are summarised below. The detailed scheme will not exceed the development heights shown. The floorspace detail may be subject to change and is provided for information only with this outline planning application.

Floorspace and Height

- Erection of Accommodation Blocks 2,328 sq. m. GIA (up to 3 storeys 12m)
- Care and Separation Unit (CASU) 485 sq. m GIA. (single storey up to 7m)
- Dining Hall 445 sq. m. (single storey up to 8m)

**Ancillary Development and Site Infrastructure**

- Erection of covered walkway (2.5m high and 160m in length)
- Creation of internal road(s), car parking (resurfacing of existing "Haslar Sea Wall" car park area in the southwest). Use of existing access/egress on Dolphin Way, Fort Road and the Haslar Se Wall Car park. Creation of internal roads and hard surfacing and creation of additional parking for staff and visitors. Resurfacing of existing car park on Fort Road and realignment and improvement of coastal path with 20 spaces retained for public use and hard surfacing, including space to accommodate members of the public on site.
- Installation of lighting columns (up to 6m high) and closed-circuit television (CCTV)
- Installation of roof top solar photovoltaic panels
- Installation of infiltration-based SuDS
- Creation of recreational space for IRC residents, biodiversity enhancements and landscaping and visual barrier.
- Realignment and improvements to the England Coastal Path through the site.
- Habitat and Biodiversity Net Gain improvements to mitigate the onsite loss resulting from the development.

### Fencing

3.7 Installation of new fencing along the car park boundary with the England Coastal Path will be up to 2m. Erection of external and internal zonal fencing within the IRC compound will be up to 5.2m. Any replacement security fencing will be up to 5.2m, as will vehicular and pedestrian gates into the IRC.

### Car Parking

3.8 Creation of additional parking for staff and visitors and 20 for the public. Provision of secure covered cycle spaces and motor bike bays.

### Landscaping (including Tree Planting / BNG)

3.9 The development will require the removal of trees and vegetation around the site (see indicative Site Plan). The applicant proposes to mitigate and enhance the site through the planting of replacement trees, vegetation and creation of biodiversity enhancements (see indicative Landscaping Plans).

### Renewable Energy

3.10 Installation of solar PV panels, as shown on indicative roof plans.

### Operation of the IRC

3.11 The expanded IRC will operate 24 hours per day, 365 days per year.

3.12 The site will be operated by a private service provider on behalf of the Home Office. Home Office compliance staff will be based on site to ensure all contractual obligations are being and continue to be met. Contracts cover all aspects of managing a safe and decent IRC, with specific focus on the welfare of those in the Home Office's care.

### Staff and Shift Patterns

3.13 The anticipated total staff numbers for the site are 265 (taking the overall total to 414). Employment will be a variety of 24/7 cover in shift patterns, and others with standard hours of work.

3.14 Staff will access the site through pedestrian access gates. Operational shift patterns are anticipated to follow established IRC working practices with peak traffic times for staff at the site will be between 7am-9am and 5pm-8pm.

### Construction

3.15 Construction works are anticipated to take place between 0800 and 1700 Monday to Friday and will be managed through a Construction Management Plan (CMP), to be required by planning condition and submitted to the LPA for approval.

### Visitors

3.16 Visitors will access the site through dedicated pedestrian entrances. Visitors can arrive at the site at any time during visiting hours. Visiting hours are typically 9am – 9pm, 7 days a week. Visitors will have dedicated parking spaces.

3.17 Using data from sites with a similar capacity, the approximate average amount of visitors expected daily is expected to be 10-15 persons. There is facility for virtual visits, reducing the need for visitors to travel to the site. Visitors will have to book their visit at least 24-hours in advance. This will provide the operator a degree of control, dictating how many people arrive and at what times, allowing for peak times to be avoided.

### Arrivals and Departures of Detained Persons

3.18 All detained persons will be adult males. Detained persons will enter and leave the site in a vehicle. The only exception is when someone is being discharged and their family are collecting them. In this instance, they will leave through the pedestrian access. Such instances are expected to be very infrequent.

3.19 There will be more arrivals than normal during the initial weeks after opening of the expanded facility whilst the site ramps up to capacity. The exact figures will be decided closer to the time and will be based on operational pressures and all pre-commencement activity being completed. 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. The numbers of detained persons on board will vary. This number of vehicles could be higher during high-profile operations. In some instances, coaches maybe used to transfer detained persons. These instances will be the exception as opposed to the rule. Arrivals and discharges could take place at any time during a 24-hour period.

### Lighting

3.20 There is existing lighting on site, which is not part of the lighting design. The lighting design for the proposal will employ measures to minimise light spill onto adjoining habitats and uses. All lighting on site will be LED lighting in line with existing provision.

### Site Waste

3.21 An Outline Site Waste Management Strategy is submitted with the application to identify how waste streams can be minimised on site.

### On-site Healthcare

3.22 All detained individuals receive an initial healthcare screening shortly after their arrival at an IRC. The healthcare team make an assessment from a medical perspective as to whether any detained individual's condition can be appropriately managed within the centre. Healthcare provision is being procured through NHS England, and there will be no impact on primary healthcare services provided within the local community.

3.23 In addition to the above, as part of the risk assessment for those transferring from the prison estate, medical information is considered to ensure residents are allocated to the most appropriate centre. Those detained from the community will be asked if they have any medical conditions as part of the risk assessment process before being allocated to an IRC.

3.24 Access to secondary care within the local area is an integral part of healthcare provision at the IRC. The demand and capacity of local health services are subject to ongoing review and management by the relevant NHS bodies, with appropriate support mechanisms in place where required.

3.25 According to the Health Needs Assessment for the proposed Haslar IRC, it is estimated 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.

### Security Arrangements

3.26 The site will be protected by physical and procedural security arrangements.

3.27 Physical security measures will be implemented across the site in accordance with Home Office standards. These will comprise a range of proportionate design and operational measures, including perimeter security, monitoring systems and access controls, to maintain the safety and security of residents and staff and to prevent unauthorised access to restricted areas.

3.28 Arrangements include, full CCTV coverage of the perimeter, 5.2m security graded fencing in accordance with HO standards, anti-climb measures, Perimeter Intruder Detection Systems (PIDS) and beam detection systems. All will aid in stopping residents accessing unauthorised areas, such as flat roofs and protected internal areas, and prevent escape.

3.29 The use of surveillance cameras will be in line with policy and all relevant legislation, including, but not limited to: Data Protection Act 1998, Regulation of Investigatory Powers Act 2000, Freedom of Information Act 2000, Human Rights Act 1998, and the Protection of Freedoms Act 2012.

3.30 The operating service provider will have a 24/7 presence on site to ensure the security arrangements laid out above, namely the contractually binding procedural security arrangements, are completed. These arrangements can be tailored to any change in risk.

3.31 A Memorandum of Understanding will be drafted with Hampshire Police during mobilisation and will confirm arrangements for managing protests and any visitors found to be in breach of any laws. The Home Office, in conjunction with the Police, will look to proactively engage with the protest groups where necessary.

# 4. Planning Policy Context

4.1 Section 38(6) Planning and Compulsory Purchase Act 2004 stipulates that in determining planning applications, determinations must be in accordance with the development plan unless material considerations indicate otherwise.

4.2 The Development Plan for Gosport Borough Council ('the Council') comprises the Gosport Borough Local Plan 2011 – 2029.

4.3 Material considerations include the National Planning Policy Framework (NPPF), the Planning Practice Guidance (PPG), relevant Supplementary Planning Documents (SPDs) and the Environment Act 2021 provisions on Biodiversity Net Gain (BNG).

## NATIONAL PLANNING POLICY FRAMEWORK (NPPF 2024)

4.4 The NPPF sets a presumption in favour of sustainable development and a positive approach to planning as a means of supporting the country's economic and housing growth, while protecting the environment. It directs local planning authorities to approve development proposals that accord with the development plan without delay.

### Sustainable Development

4.5 Paragraph 8 of the NPPF advises that there are three dimensions to sustainable development economic, social and environmental, which are independent and need to be pursued in mutually supportive ways

- *"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 well-designed, beautiful and safe places, with accessible services and open spaces that reflect current and future needs and support communities' health, social and cultural well-being; and*

- *an environmental objective – to protect and enhance our natural, built and historic environment, including making effective use of land, improving biodiversity, using natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change, including moving to a low carbon economy".*

4.6 Paragraph 11 of the National Planning Policy Framework establishes the presumption in favour of sustainable development, which underpins plan-making and decision-taking. It states that *"development proposals should be approved where they accord with an up-to-date development plan. Where relevant policies are out-of-date or absent, permission should be granted unless the adverse impacts would significantly and demonstrably outweigh the benefits, or specific policies in the Framework indicate that development should be restricted."*

### Healthy and Safe Communities and Public Service Infrastructure

4.7 Paragraph 96 requires that planning decisions should aim to achieve healthy, inclusive and safe places, which among other things ensure the fear of crime does not undermine the quality of life or community cohesion.

4.8 Additionally, development should enable and support healthy lives by providing adequate sports facilities and meet local health needs.

4.9 Paragraph 101 of the NPPF states that *"to ensure faster delivery of other public service infrastructure such as criminal justice accommodation, local planning authorities should work proactively and positively with promoters, delivery partners and statutory bodies to plan for required facilities and resolve key planning issues before applications are submitted."*

4.10 Paragraph 102 requires planning decisions to promote public safety and to take into consideration wider security requirements by recognising and supporting development required for security purposes.

**Transport & Accessibility**

4.11 Paragraph 109 sets out the overarching aim to ensure transport issues are considered from the earliest stages of plan-making and development proposals. This includes assessing the potential impacts on transport networks, opportunities to promote sustainable modes, and ensuring safe and suitable access for all users.

4.12 Paragraph 112 outlines that parking standards for non-residential development should consider *"the accessibility of the development, the type, mix and use of development, the availability of and opportunities for public transport, local car ownership levels; and the need to ensure an adequate provision of spaces for charging plug-in and other ultra- low emission vehicles."*

4.13 In decision making, as per paragraph 115, it should be ensured *"appropriate opportunities to promote sustainable transport modes are prioritised taking account of the vision of the site; safe and suitable access to the site can be achieved for all users; and any significant impacts from the development on the transport network (in terms of capacity and congestion), or on highway safety, can be cost effectively mitigated to an acceptable degree through a vision led approach."*

4.14 Paragraph 116 states that *"development should only be prevented or refused on highway grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road would be severe."*

4.15 Finally, paragraph 117 encourages the provision of electric vehicle charging infrastructure.

**Effective Use of Land**

4.16 Paragraph 124 encourages the accommodation of *"objectively assessed needs, in a way that makes as much use as possible of previously developed or 'brownfield' land."*

4.17 Paragraph 125 states decisions should *"promote and support the development of under-utilised land and buildings."*

**Design Quality and Amenity**

4.18 Paragraph 135 states that planning decisions should ensure that developments:

*"a) will function well and add to the overall quality of the area.*

*b) are visually attractive as a result of good architecture, layout and appropriate and effective landscaping.*

*c) are sympathetic to local character and history, including the surrounding built environment and landscape setting, while not preventing or discouraging appropriate innovation or change (such as increased densities)"*

4.19 Paragraph 136 notes the importance of trees in new developments, encouraging the integration of green infrastructure to enhance environmental quality and biodiversity.

4.20 Paragraphs 139 states that developments that are not well-designed should be refused, especially where they fail to reflect local design policies. Significant weight should be given to proposals that raise design standards or demonstrate innovation and sustainability.

### Climate Change & Flooding

4.21 Paragraph 161 sets the overarching expectation that the planning system should *"help shape places that contribute to radical reductions in greenhouse gas emissions, minimise vulnerability and improve resilience; encourage the reuse of existing resources, including the conversion of existing buildings; and support renewable and low carbon energy and associated infrastructure."*

4.22 Paragraph 166 requires new development to:

*"a) comply with any development plan policies on local requirements for decentralised energy supply unless it can be demonstrated by the applicant, having regard to the type of development involved and its design, that this is not feasible or viable; and*

*b) take account of landform, layout, building orientation, massing and landscaping to minimise energy consumption."*

4.23 Paragraph 170 seeks development in areas at risk of flooding should be avoided by steering it to areas of lowest risk. Where development is necessary in flood-prone areas, it must be safe for its lifetime and not increase flood risk elsewhere.

4.24 Paragraph 172 sets out the sequential, risk-based approach to the location of development. Paragraph 173 confirms that the sequential test should apply to individual applications in areas known to be at risk now. Paragraph 177 states that *"Having applied the sequential test, if it is not possible for development to be located in areas with a lower risk of flooding (taking into account wider sustainable development objectives), the exception test may have to be applied. The need for the exception test will depend on the potential vulnerability of the site and of the development proposed."*

4.25 Paragraph 178 sets the requirements for a development to pass the exception test. Specifically, that *"a) the development would provide wider sustainability benefits to the community that outweigh the flood risk; and b) the development will be safe for its lifetime taking account of the vulnerability of its users, without increasing flood risk elsewhere, and, where possible, will reduce flood risk overall."*

4.26 Paragraph 181 requires planning applications to demonstrate that flood risk is not increased elsewhere. Development should place the most vulnerable uses in the lowest-risk areas, be flood-resistant and resilient, include sustainable drainage systems (SuDS), manage residual risk, and provide safe access and escape routes.

4.27 Paragraph 182 asks applications affecting site drainage must include SuDS that control runoff and offer multifunctional benefits such as improved water quality, biodiversity, and amenity. For major developments, SuDS must meet operational standards, include maintenance arrangements, and reflect advice from the Lead Local Flood Authority.

### Natural Environment and Biodiversity

4.28 Paragraph 187 outlines that planning policies and decisions should contribute to and enhance the natural and local environment. This includes protecting valued landscapes, recognising the intrinsic character and beauty of the countryside, and preventing pollution and land instability. Development should aim to improve local environmental conditions, such as air and water quality.

4.29 Paragraphs 192–195 focus on biodiversity. Planning should promote the conservation, restoration, and enhancement of priority habitats and ecological networks. They identify specific protection areas noting that the presumption in favour of sustainable development does not apply where the proposal is likely to have a significant effect on a habitats site.

4.30 Paragraphs 179–180 require planning authorities to take a strategic approach to maintaining and enhancing green infrastructure and to plan positively for the creation, protection, and management of networks of biodiversity and green spaces.

### Ground Conditions and Pollution

4.31 Paragraph 196 states that *"planning decisions should ensure that a site is suitable for its proposed use taking account of ground conditions and any risks arising from land instability and contamination."*

4.32 Paragraph 198 states that *"planning decisions should ensure that new development is appropriate for its location taking into account the likely effects (including cumulative effects) of pollution on health, living conditions and the natural environment, as well as the potential sensitivity of the site or the wider area to impacts that could arise from the development. In doing so they should:*

*a) mitigate and reduce to a minimum potential adverse impact resulting from noise from new development – and avoid noise giving rise to significant adverse impacts on health and the quality of life.*

*b) identify and protect tranquil areas which have remained relatively undisturbed by noise and are prized for their recreational and amenity value for this reason; and*

*c) limit the impact of light pollution from artificial light on local amenity, intrinsically dark landscapes and nature conservation."*

### Heritage

4.33 Section 16 of the NPPF, Conserving and enhancing the historic environment, sets out the government's planning policies for England and how these are expected to be implemented.

4.34 Paragraph 207 requires planning applications relating to proposals affecting heritage assets to describe the significance of the heritage assets affected, including any contribution made by their setting with a level of detail proportional to the assets importance in order to understand the potential impact of the proposal on the asset. This outlines the requirement for an appropriate desk-based assessment completed by a professional with an appropriate expertise, to be included within an application, where a site on which development is proposed includes or has the potential to include heritage assets with archaeological interest.

4.35 Paragraph 215 states that *"where a development proposal will lead to less than substantial harm to the significance of the heritage asset, this should be weighed up against public benefits of the proposal including securing its optimum viable use."*

4.36 Paragraph 216 states that *"In weighing applications that directly or indirectly affect non-designated heritage assets, a balanced judgement will be required having regard to the scale of any harm or loss and the significance of the heritage asset."*

## GOSPORT LOCAL PLAN

4.37 The extract from the Proposals Map for the adopted Local Plan in figure 4.1 below shows the site does not have a specific land use allocation, although the existing Haslar IRC buildings that formed the former Haslar Barracks site now forms the Haslar Barracks Conservation Area that was designated following the adoption of the Plan.

4.38 The defined urban area is identified by a dashed brown line and includes the IRC and the majority of the Site. The land north of Dolphin Way forms part of the Haslar Peninsula Conservation Area and is allocated for mixed use development and forms a Regeneration Area. The adjoining Golf Course to the south is allocated as existing open space.




Figure 4.1 – Local Plan Extract.

4.39 The table below identifies the relevant policies to the determination of the proposed development and summarises the key requirements of each policy.

| Policy Reference | Purpose and Requirements |
|---|---|
| LP3 Spatial Strategy | Establishes that development within the defined urban area is permitted if it complies with Policy LP10 (Design) and other Local Plan policies.<br><br>Brownfield land will be the priority for new development. |
| LP6 Haslar Peninsula | Establishes the general principles for the determination of planning applications within the Haslar Peninsula area, which borders the IRC to the north but does not include the application site.<br><br>It confirms that planning permission will be granted for development that conserves and enhances the heritage and setting of the Haslar Peninsula. |

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| LP10 Design | Establishes the approach to consideration of design.<br><br>The Borough Council will refuse planning permission for poor design and requires new development to respect the Borough's distinctive built and natural character, including heritage assets.<br><br>Proposals must achieve high-quality design in terms of scale, layout, materials, and landscaping.<br><br>Development should protect biodiversity and important views, and ensure safe, well-connected routes for pedestrians, cyclists, and public transport.<br><br>It must create safe, healthy neighbourhoods without causing harm through loss of light, privacy, or pollution, and be adaptable to climate change while meeting national sustainability standards.<br><br>Comprehensive development and efficient land use are essential, and major proposals must include Design and Access Statements addressing these principles. |
| LP11 Designated Heritage Assets including Listed Buildings, Scheduled ancient Monuments and Registered Historic Parks and Gardens | Applications affecting heritage assets must include a proportionate assessment of their significance and potential impact.<br><br>Planning permission will be refused for proposals that harm the significance of Listed Buildings, Registered Parks & Gardens, or Scheduled Monuments, but will be supported where development positively contributes to or better reveals their setting. These principles also apply to undesignated assets found to be of national significance. |
| LP12 Designated Heritage Assets: Conservation Areas | Establishes that the Council will aim to conserve the character and appearance of existing Conservation Areas.<br><br>Development within Conservation Areas will be permitted if its design, scale, layout, and appearance preserve or enhance the area's historic or architectural interest and setting, including key views. Demolition will only be allowed where a building makes no positive contribution, lacks historic or architectural value, or is beyond repair, and where replacement development of architectural merit is delivered promptly to maintain the area's character. |
| LP17 Skills | The Borough Council will require employment and training measures within appropriate development proposals. |
| LP22 Accessibility to New Development | Sets out the criteria development proposals must meet where significant travel demand is generated. It requires the submission of Transport Assessments and Travel Plans to evidence how the proposal meets the requirements.<br><br>If proposals are served by, or commit to providing, convenient public transport, and are accessible to pedestrians and cyclists.<br><br>Road access and traffic impacts must not harm the environment or compromise road safety and capacity. Where necessary, local and |

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| | strategic transport improvements should be delivered to support the development and mitigate adverse effects. |
| LP23 Layout of Sites and Parking | Development proposals will be permitted where site layouts provide safe, convenient pedestrian and cycle routes connected to existing networks, safeguard or enhance public rights of way, and include bus access with well-located stops for larger schemes.<br><br>Adequate provision must be made for vehicle access, manoeuvring, parking (including for motorcycles, bicycles, goods vehicles, and electric cars), and loading in a safe manner.<br><br>Sufficient visibility and lighting should ensure safe use of roads and paths, with traffic management measures to maintain safety for all users.<br><br>Access and parking for people with disabilities must meet current standards. |
| LP37 Access to the Coast and Countryside | Council supports public access to the coast and countryside and will permit development that maintains existing access and, where practical, incorporates new links to the public rights of way network. Any access provided must avoid harm to sensitive habitats and species. |
| LP38 Energy Resources | Establishes an objective to improve the energy efficiency of existing buildings. New development will be required to meet at least the relevant national standards for energy use and CO2 reduction.<br><br>This includes measures set out in the zero-carbon hierarchy as follows:<br><br>a) be designed to maximise energy efficiency and design out the need for energy use by means of the scheme layout and the orientation and design of individual buildings.<br><br>b) connect to existing combined heat and power (CHP) and District Heating/Cooling networks or contribute to their future development.<br><br>c) use renewable energy technologies to produce required energy on-site; and<br><br>d) make use of 'Allowable Solutions' to deal with any remaining CO2 emissions. |
| LP39 Water Resources | The Borough Council aims to manage water resources by preventing development that harms surface, ground, or coastal water quality, while encouraging enhancements.<br><br>Proposals will only be permitted where adequate water resources exist.<br><br>Development must support efficient sewerage infrastructure, ensuring no building over existing sewers, separation of surface and foul water, and provision of adoptable sewers where needed. Sustainable drainage systems should be incorporated where |

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| | practical, with adequate capacity, timely provision before occupation, and long-term maintenance arrangements. |
| LP42 International and Nationally Important habitats | Planning permission will not be granted for development that compromises the integrity of internationally important sites, which are afforded the highest level of protection under international and national regulations.<br><br>All new residential development must avoid or mitigate significant effects on these habitats, including recreational disturbance. Development that harms a Site of Special Scientific Interest (SSSI) will normally be refused unless it can be demonstrated that the site's integrity will not be compromised or that any adverse impacts are clearly outweighed by national social and economic benefits.<br><br>In exceptional cases where development affecting an SSSI is permitted, conditions or obligations will be applied to protect its nature conservation value, with mitigation and compensatory measures used only as a last resort. |
| LP44 Protecting Species and Other Features of Nature Conservation Importance | Planning permission will not be granted for development that harms protected species, their habitats, or other important nature conservation features unless an overriding need for the development is demonstrated.<br><br>Where permitted, conditions or obligations will secure measures to protect species, minimize disturbance, provide alternative habitats, and enhance biodiversity. Proposals must safeguard UK Priority Habitats and Species and strengthen populations, with appropriate management agreements and conditions to ensure no net loss of biodiversity. |
| LP45 Flood Risk and Coastal Erosion | For development proposals on sites not allocated in the Local Plan, it must be clearly demonstrated that the sequential approach for site selection has been followed and the Sequential Test has been met. Where it is necessary to apply the Exception Test, all the associated criteria in the NPPF (or national policy equivalent) must be met to the satisfaction of the Council.<br><br>A site-specific Flood Risk Assessment is mandatory, showing safe access/egress or providing refuge and evacuation plans if access cannot be achieved. Proposals must prevent any net increase in surface water run-off, incorporate Sustainable Drainage Systems with long-term maintenance, and include flood resilience measures for buildings and infrastructure. Developer contributions may be required for flood defences, and land may be safeguarded for future flood risk management. All measures must avoid harm to internationally important habitats |
| LP46 Pollution Control | Planning permission will be refused for development likely to cause significant adverse environmental impacts from air, noise, or light pollution. Proposals must not exceed national air quality standards or be located where air quality is poor. Noise-sensitive developments will not be permitted near existing or proposed noise sources, and noise-generating uses must not harm nearby sensitive uses. External |

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|---|---|
| | lighting in urban areas will only be allowed where it does not significantly impact the environment or residential amenity. |
| LP47 Contamination and Unstable Land | Development on or near potentially contaminated land requires a site assessment and report to identify contamination. Planning permission will only be granted if effective measures are proposed to treat or control contaminants, preventing risks to future occupiers, neighbouring land uses, and gardens, as well as avoiding contamination of adjoining land or pollution of water bodies including groundwater, Portsmouth Harbour, and the Solent. For land that is or may become unstable, the Council must be satisfied that stability issues can be resolved, and a stability report must be submitted with the application |

**Haslar Barracks Conservation Area Appraisal (2018)**

4.40 Figure 4.2 shows the extent of the Conservation Area. The vehicular and pedestrian access to the IRC extensions will use the existing site infrastructure within the IRC Conservation Area.

4.41 In relation to development within the setting of the Conservation Area, the Area Appraisal states that *"The western boundary to the site should retain a landscaped strip of land between the existing buildings and any future development to its south-west: possibly with consideration given to tree planting and a footpath link to the waterfront to ensure a degree of separation. Any development would need to have regard to the context of the Barracks site to ensure it would not be overbearing in form or harm its setting."*

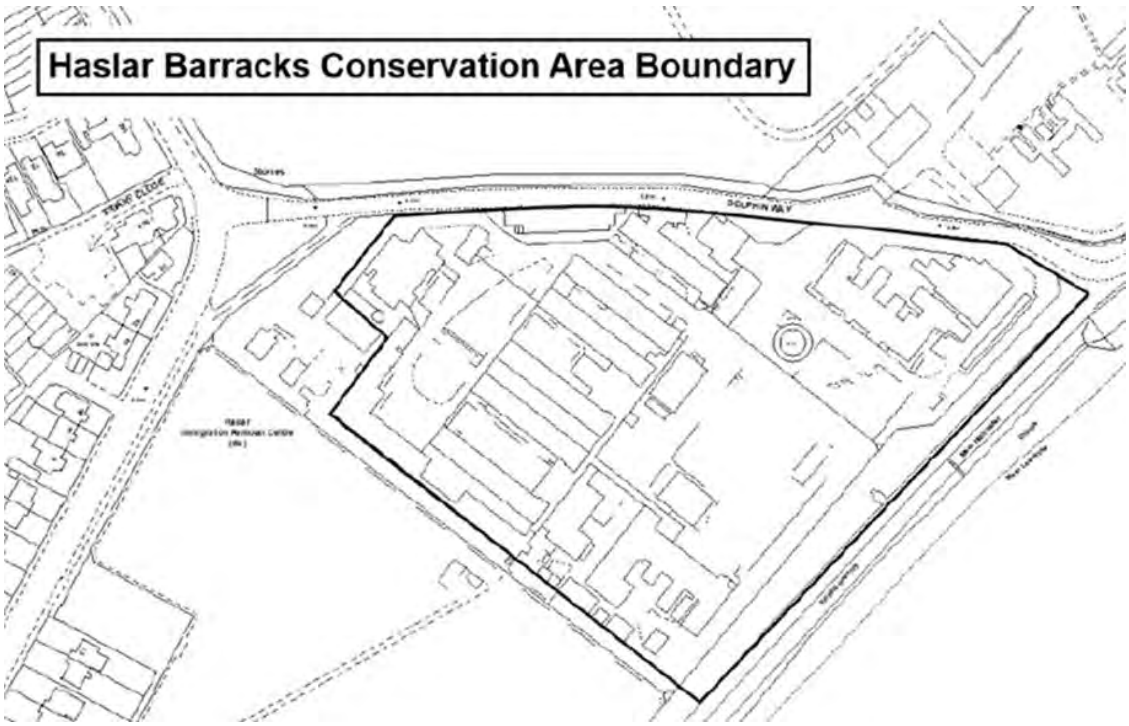



Figure 4.2 – Haslar Barracks Conservation Area Boundary

**Parking Supplementary Planning Document (2014)**

4.42 The SPD sets out the parking standards for Gosport Borough and is applicable to residential and non-residential developments and redevelopments of all scales.

### Design Supplementary Planning Document (2014)

4.43 The SPD is designed to provide guidance on Gosport Borough Council's expectations and aspirations for the design of new development (both residential and non-residential) in the Borough.

# 5. The Need for Additional IRC Accommodation

### Legislative Framework

5.1 The powers to detain for immigration purposes derive from the Immigration Act 1971, the Nationality, Immigration and Asylum Act 2002, the UK Borders Act 2007 and the Immigration (European Economic Area) Regulations 2016. Section 12 of the Illegal Migration Act 2023 provides that detention may only be for such period as is considered reasonable in order to enable the specific statutory purpose of detention to be carried out (for example, to enable examination, removal or deportation to be affected).

5.2 The legislative framework for the management and operation of IRCs is set out in Part VIII (sections 147 to 153) of the Immigration and Asylum Act 1999 and in the Detention Centre Rules 2001 (Statutory Instrument 2001/238). Section 147 of the 1999 Act was amended by section 66 of the Nationality, Immigration and Asylum Act 2002 (which changed the name from "detention centres" to "removal centres"). Paragraph 18(1) of Schedule 2 to the Immigration Act 1971 states that individuals may only be detained "in such places as the Secretary of State may direct". This requirement is met via the Immigration (Places of Detention) Direction which must be updated before any new immigration removal centre opens to add the name of the centre to the document. The current version is the Immigration (Places of Detention) Direction 2025.[3]

### The Purpose of Detention

5.3 Detention plays a key role in maintaining effective immigration controls and securing the UK's borders, particularly in connection with the removal of people who have no right to remain in the UK, but who refuse to leave voluntarily.

5.4 IRCs provide a secure and humane environment for detaining foreign nationals who are subject to immigration control and are awaiting removal from the United Kingdom. Individuals are detained in IRCs to facilitate their removal from the UK. People who may be detained include those who have reached the end of a custodial sentence and are awaiting deportation as well as those who have no legal right to remain in the UK. The use of detention is governed by statutory requirements and published Home Office detention policy, which emphasises that detention should only be used when necessary and for the shortest period possible.

### Demand

5.5 Current demand for immigration detention capacity vastly outstrips supply. Small boats are just one source of irregular migration. In 2023, over 29,400 people arrived irregularly in the UK, rising to more than 36,800 in 2024 via this route. For 2025, there were over 41,400 arrivals, the highest number since 2022. Both the Prime Minister and the Home Secretary have confirmed that tackling irregular migration remains a top government priority.

5.6 The challenge of irregular migration is reflected in recent international statements. On 9 September 2025, the Five Eyes partners issued a joint statement reaffirming their shared commitment to a set of common principles on returns. This reflects growing international concern around the rise in regular, irregular, and illegal migration, which presents a complex set of challenges for origin, transit, and destination countries. These pressures are placing increasing strain on the capacity and integrity of immigration systems globally.

[3] https://www.gov.uk/government/publications/immigration-places-of-detention-direction-2021

5.7 In parallel with international efforts, the UK Government has demonstrated continued political focus on enforced returns. This is reflected in two key public statements which together illustrate both the operational intensity and the wider policy direction. The first is the Prime Minister's statement of 31 March 2025, which set out the scale of immigration enforcement activity, noting that more than 48,000 people had been returned since the last election, including 36,600 returns in the 12 months to the end of October 2025, representing a 10% increase on the same period in the previous year. This announcement primarily focused on operational delivery and the escalation of enforcement activity.

5.8 Separately, the Government's asylum and returns policy statement, *Restoring Order and Control*, set out the broader strategic framework for reforming the asylum system, strengthening returns policy and reducing irregular migration.[4]

5.9 On 19 October 2025, a record single flight of illegal migrants was returned under the UK-France agreement. The Home Secretary pledged to further scale up removals to France, stating: *"This is just the beginning. I will scale up these removals to France, and I will do whatever it takes to secure our borders."* This momentum underscores the sustained political interest in enforced returns and the operational capacity required to support them.

5.10 The continued arrival of small boats and the sustained pressure on prison capacity underscore the urgent need to expand the detention estate, enabling increased removals and alleviating this strain.

5.11 Additionally, detention is used for effecting the deportation of Foreign National Offenders. Time-served Foreign National Offenders (TSFNOs) awaiting deportation are transferred to an IRC at the end of their prison sentence if they can be returned within a reasonable period and present a risk of absconding, and harm to the public. Changes following the Sentencing Review may result in more Foreign National Offenders being given suspended sentences rather than immediate custodial sentences reducing the volume of TSFNOs transferring from Prisons to IRC. Given the ongoing demand associated with the return of Foreign National Offenders (FNOs), together with wider changes arising from sentencing reform, there is a sustained and increased requirement for detention capacity. This demand represents a material and structural pressure on the detention estate, necessitating additional capacity to ensure the system can continue to operate effectively.

5.12 Demand for immigration detention capacity continues to exceed available supply at a national level. While the detention estate has been expanded in recent years, capacity has not kept pace with changing operational demands, including the increased focus on enforced returns of Foreign National Offenders and the impacts of sentencing reform.

5.13 Recent ministerial statements[5] have confirmed Government approval for a significant expansion of detention capacity, including up to 1,000 additional beds at Haslar IRC and Campsfield IRC.

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[4] https://www.gov.uk/government/publications/asylum-and-returns-policy-statement/restoring-order-and-control-a-statement-on-the-governments-asylum-and-returns-policy

[5] On 1 September 2025, Yvette Cooper (then Home Secretary) stated to the House of Commons:

- "We are also increasing detention and returns capacity, including a 1,000-bed expansion at Campsfield and Haslar, with the first tranche of additional beds coming online within months to support many thousands more enforced removals each year." (Borders and Asylum - Hansard - UK Parliament).

Similarly, Minister Norris and Lord Hansen confirmed in a Written Ministerial Statement on 8 December 2025:

- "Detention plays a crucial role in maintaining effective immigration control and securing our borders. It is right that those with no right to remain in the UK are removed if they do not leave voluntarily. Campsfield IRC is the first of several new detention facilities planned under this government, with expansions at this site and Haslar IRC to provide 1,000 additional bedspaces. Every additional detention bedspace translates to more offenders and illegal migrants removed from our country as we restore order and control to our borders while providing sanctuary to those genuinely fleeing danger. This expansion will mean thousands

This publicly endorsed programme reflects the sustained level of demand across the detention estate and the recognised need to increase capacity to support immigration enforcement priorities.

5.14 This sustained pressure on the detention estate demonstrates the need for additional, modern Immigration Removal Centre accommodation. The proposed development at Haslar IRC forms part of this wider, Government-approved response and will make a meaningful contribution towards addressing capacity constraints, improving resilience across the estate and supporting the Government's priorities for immigration enforcement and public safety.

5.15 This shortfall demonstrates the urgent need for additional IRC accommodation to meet projected demand, maintain resilience and support the Government's priorities for immigration enforcement and public safety.

**Existing and Proposed Supply**

5.16 The immigration removal estate is kept under review to ensure that the Home Office has sufficient resilience, geographical footprint and capacity for those men and women it is necessary to detain for the purposes of removal, while providing value for money.

5.17 Demand for detention beds has grown precipitously over recent years, reinforcing the need for a robust and responsive detention infrastructure. As such, the Home Secretary's current priorities include reducing small boat arrivals, ending the use of hotels for asylum accommodation, implementing FNO sentencing reforms, and expanding enforced returns. Ministers have set ambitious targets for removals, but limited detention space remains a critical bottleneck.

5.18 At present, the existing estate has a capacity of 2,628 beds, including eight immigration removal centres, three Residential Short-Term Holding Facilities (RSTHF), one Residential Holding Room and one Pre-Departure Accommodation unit, supplemented by around 200 beds within the prison estate, (summarised in table 5.1). Operationally available capacity is lower than the headline figure due to constraints such as single-sex facilities, isolation requirements, maintenance downtime, and contingency headroom for surge events. Current modelling indicates that, after accounting for these factors, effective capacity is closer to c2,300 beds. The need for additional provision is to meet projected demand and maintain resilience.

Table 5.1 – Existing Detention Estate IRC Total Capacity

| Home Office Detention Estate | Capacity |
|---|---|
| Dungavel | 150 |
| Tinsley House | 198 |
| Brook House | 426 |
| Yarl's Wood | 444 |

more enforced returns of foreign national offenders and failed asylum seekers per year, sending a clear message: if you come here illegally, you will not be able to stay."
(Campsfield Immigration Removal Centre - Hansard - UK Parliament)

| | |
|---|---|
| Campsfield | 160 |
| Derwentside | 84 |
| Colnbrook | 339 |
| Harmondsworth | 739 |
| Swinderby (RSTHF) | 37 |
| Manchester (RSTHF) | 32 |
| Larne (RSTHF) | 19 |
| Total | 2,628 |

5.19 The Home Office is increasing detention spaces to support a higher level of removals.

5.20 The case for change was motivated by successive prime ministerial commitments and new legislation. Following the change in Government in July 2024, the case for change remains one motivated by a prime ministerial commitment: most significantly, to increase removal volumes of those with no legal right to remain in the UK, including Time-Served Foreign National Offenders (TSFNOs).

5.21 The Immigration Removal Centre Expansion Programme's (IRCEP) expansion of the immigration detention estate will enable the Government to enforce the removal of more individuals without leave to remain in the UK, further protect the public, and make our streets safer by removing more TSFNOs.

5.22 The requirement for additional IRC accommodation is determined by measuring case flows. Case flows refer to the movement of individuals through the immigration enforcement process - from arrival, through detention, to removal or release. It captures the volume and timing of cases entering and exiting the system, which directly impacts bed demand. It is influenced by the following factors:

- Expected arrivals.
- Average length of stay.
- Throughput rates (how quickly cases progress to removal).
- Surge contingencies for peak periods.

5.23 Case flows are the core input for capacity modelling. Higher case flows (more arrivals or slower processing) increase the number of beds needed at any given time.

5.24 The demand model converts projected case flows into required detention capacity through a structured set of assumptions. It includes the following:

- The population of interest, which is the current number of people who are in the UK without immigration status and are of interest to IE.

- Returns history – how many people are typically returned from the current estate, including assumptions on key metrics, like average bed nights detained and returns percentage.

- Assumptions around how the overall demand is expected to change because of policy changes and other factors (for example, the returns agreement with France and the recent Sentencing Act).

5.25 A detention rate is then applied to estimate the proportion of arrivals who may be suitable for immigration detention, rather than alternative measures. The requirement represents an optimal figure (or range) of capacity where the Home Office ensures removal of irregular migrants increases significantly and this balances with legal constraints and value for money considerations. This approach provides an evidence-based mechanism for determining Immigration Removal Centre requirements and supports strategic planning for enforcement and removal objectives.

5.26 The strategy is to increase capacity to 3,500 by 2030. IE has been tasked to deliver an additional 1,000 detention bed spaces[6] to meet this ambition, some of which have already been delivered. IRCEP will be central to the Government's missions, "Strong Foundations: Secure Borders" and "Safer Streets", by supporting the Home Office's ambitions to increase the removal rates of those here unlawfully over time and strengthen public safety. It will also help address the need to manage the immigration detention estate and maintain capacity while wider detention facilities are, where required, being refurbished or improved.

5.27 The expansion of Haslar IRC is essential to meeting this need. Like other Immigration Removal Centres, Haslar IRC will accommodate a mixture of individuals liable for removal from the UK, including time-served foreign national offenders (TSFNOs), overstayers, failed asylum seekers and others who have breached immigration laws.

5.28 The proposed increase in IRC capacity will:

- Support immigration enforcement and public safety.

- Provide resilience in detention capacity.

- Align with government priorities for swift and fair removals.

- Enable an increase in removal volumes of individuals with no legal right to remain in the UK, including Time Served Foreign National Offenders (TSFNOs).

- Support public safety through the "Strong Foundations: Secure Borders" and "Safer Streets" missions.

5.29 The expansion of Haslar IRC (from the 130 beds after refurbishment works are complete in 2027 to a total of 600 beds) would enable more of those with irregular immigration status to be removed from the UK. It will also meet the cross-system requirement for detention capacity whereby the Government's ambitions to reduce the supported population in hotels require enforced removals for those whose cases are not granted.

5.30 The consequences of not securing a timely grant of permission for these proposals include serious impacts on border infrastructure and the Department's ability to enforce removals. Not progressing with this development would significantly limit the Department's ability to respond to future

[6] 1,000 new places are being provided by the re-opening of Campsfield IRC (160 spaces) and the re-opening of Haslar IRC (130 spaces) together with the expansion of Campsfield IRC (240 spaces) and the expansion of Haslar IRC (470 spaces).

pressures, manage border infrastructure efficiently, and deliver on policy objectives. The additional IRC is therefore essential to ensure the Department can meet its statutory responsibilities and adapt to evolving operational demands.

5.31 It is important to note that demand modelling indicates even more demand in addition to the extra 1,000 places are required to meet projected case flows. Consequently, additional IRC development will be required in addition to the proposed development, and this underlines the importance of expanding Haslar IRC.

**The Public Purse**

1.32 This investment will support the Home Office in achieving its objectives, including delivering value for money for the taxpayer. A key aim of government policy is to effect the removal of individuals who have been refused asylum or are otherwise liable to removal under immigration law. Effective removal relies on ensuring that individuals are available when required for departure from the UK. Detention is used, in accordance with statutory powers and published policy, where there is a risk that an individual would not comply with removal directions or would otherwise abscond.

# 6. Planning Considerations

6.1 This section of the Planning Statement provides justification in support of the outline planning application, with reference to the planning policy framework and material considerations set out in the previous sections. The section is set out in the following order:

- The Spatial Strategy for Gosport / efficient use of land[7]
- Sustainable Development
- Design Approach
- Landscape and Visual Impact
- Transport
- Ecology and Biodiversity Net Gain
- Flood Risk and Drainage
- Impact on Local Population and Residential Amenity
- Contamination
- Heritage and Archaeology

**The Spatial Strategy for Gosport / Efficient Use of Land**

6.2 The Haslar IRC site is located on the Haslar Peninsula. It adjoins a strategic mixed-use land use allocation (the Haslar Peninsula – Policy LP6), which incorporates the Royal Hospital site (medical, health and care, residential care, employment, retail, leisure and residential uses supported), Blockhouse (employment and training, leisure, tourism and residential uses supported) and Haslar Maine Technology Park (employment uses supported). The strategic allocation supports the regeneration of a large part of the Haslar Peninsula through a variety of commercial and residential uses that will retain and enhance the heritage assts within the site. It is within this context that the proposed development should be considered.

6.3 The proposed development comprises an extension of an existing IRC facility, which is an important part of the Government's national infrastructure. The IRC is currently being refurbished and is due to open in 2027. The continued use of the site as an IRC has ensured the retention and continued beneficial use of the existing buildings within the Haslar Barracks Conservation Area.

6.4 The Development Plan does not make provision for the expansion of the Haslar IRC. The Proposals Map shows the IRC site within the urban area, adjacent to a major mixed-use land allocation (Haslar Peninsula) and as such the proposed development is acceptable in principle subject to compliance with other policies contained in the Local Plan. It is recognised that the existing Haslar Sea Wall car park lies outside the urban area, and the proposed development only proposes an extended car park in this location where there is currently an existing car park and

[7] Previously Developed Land / Brownfield Land

where previously additional car parking was provided on land south of the existing car park as shown in the photograph below taken in 2007 (the proposed extended car park area).



Figure 6.1 – 2007 photograph of Haslar Sea Wall Car Park (source: GoogleEarth).

6.5 Policy LP3 encourages the development of brownfield land (previously developed land) within the urban area.

6.6 The application site includes previously developed land. All the new buildings are proposed 'within the wire' of the existing IRC, i.e. within an area of recreational open space surrounded by a 5.2 metre security fence. The proposed car park extension is located on land that was previously used for car parking associated with the IRC, although this use has not taken place since 2015.

6.7 The NPPF defines previously developed land as:

*"Land which has been lawfully developed and is or was occupied by a permanent structure and any fixed surface infrastructure associated with it, including the curtilage of the developed land (although it should not be assumed that the whole of the curtilage should be developed). It also includes land comprising large areas of fixed surface infrastructure such as large areas of hardstanding which have been lawfully developed. Previously developed land excludes: land that*

*is or was last occupied by agricultural or forestry buildings; land that has been developed for minerals extraction or waste disposal by landfill, where provision for restoration has been made through development management procedures; land in built-up areas such as residential gardens, parks, recreation grounds and allotments; and land that was previously developed but where the remains of the permanent structure or fixed surface structure have blended in to the landscape."*

6.8 In the recent High Appeal Case R (on the application of Ribble Valley Borough Council) v (1) Secretary of State for Housing, Communities and Local Government (2) Majid Hussain [2025] EWHC 2363 (Admin) court ruling clarified how planners should assess whether part developed green belt site is previously developed land or not.

6.9 The decision centred around the application of R (on the application of Lee Valley Regional Park Authority) v Broxbourne BC [2015] EWHC 185 (Admin).

6.10 In Broxbourne, Ouseley J stated in paragraph 51 that while "the flexibility in the NPPF for previously developed land may not require every part of the application site to have been previously developed land, the presence of some previously developed land within an application site does not make the whole site previously developed land either, applying the definition in the NPPF".

6.11 In Ribble Valley, Judge Ridge ultimately found in Paragraph 72 that: "The Inspector appears to have undertaken an assessment of the site and concluded that the whole site was PDL. His bare conclusion that the site was PDL gives no indication that he has taken into account the different elements and parcels of the site and their differing characteristics as against the glossary definition. <….> A more detailed analysis as to the constituent parts of PDL was needed to support a lawful conclusion that the whole site was PDL. "

6.12 Based on the above, it is considered the application site can be assessed in three distinct parts as shown in figure 6.2:

- The existing IRC (area A) – land comprising the existing IRC and access road.
- The proposed IRC expansion area (Area B) - land enclosed by the existing security fence of Haslar IRC, as well as the existing Haslar Sea Wall car park.
- The Extended Car Park (Area C) – land consisting of land previously used for car parking until 2015.

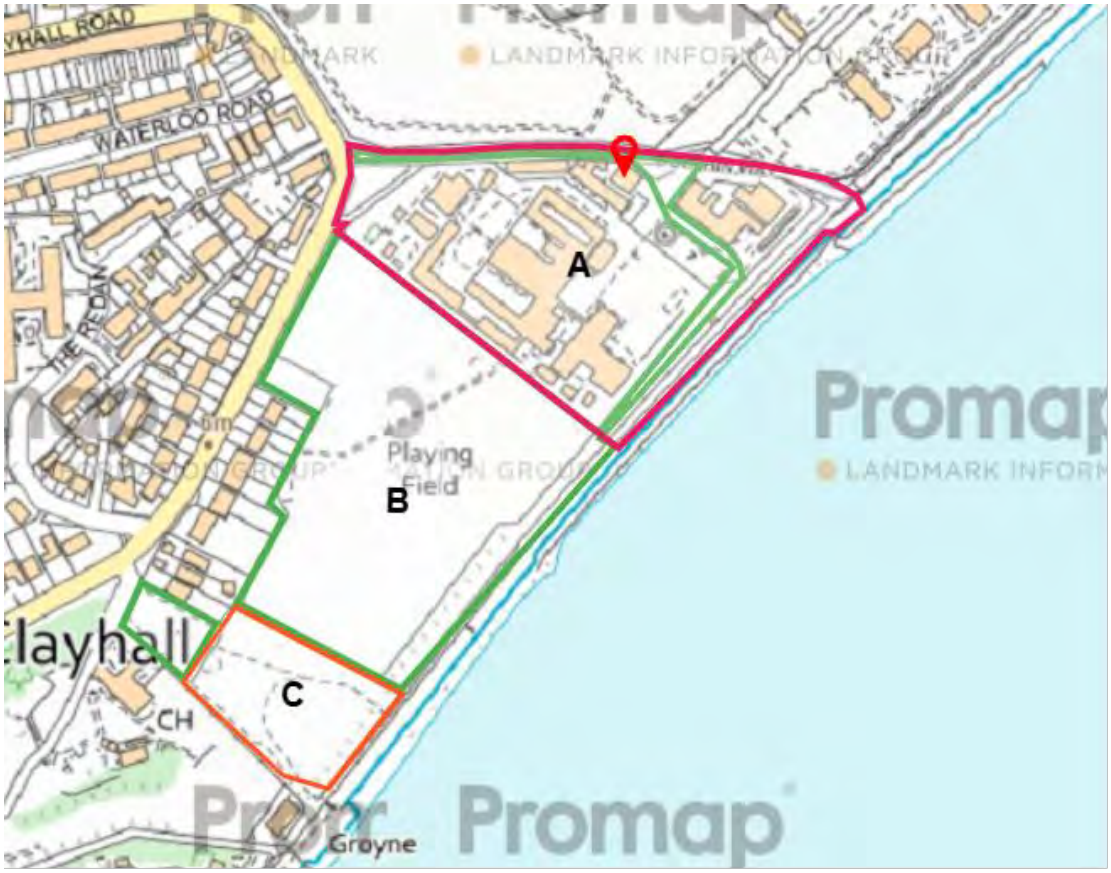



Figure 6.2 – IRC Development Parcels

6.13 The existing IRC and the proposed IRC expansion area are considered to be previously developed land as they fall within the long-established curtilage of the existing IRC with large scale fixed infrastructure surrounding it. This area of land falls within the same physical enclosure as the IRC buildings and is directly connected with its use, i.e. it passes the 'part and parcel' test as established in the Court of Appeal decision of R (Hampshire County Council) v Secretary of State for Environment, Food and Rural Affairs. The existing Haslar Sea Wall Car Park is considered previously developed land.

6.14 Even if the IRC expansion area were not considered previously developed land, it is located within the urban area as defined in the Development Plan. Furthermore, the land was allocated for residential/mixed-use development in the Gosport Draft Local Plan 2038, as shown in figure 6.2 below. The supporting text indicated that *"the playing fields in the western portion of the site are also considered appropriate for new housing."* It is acknowledged that this draft allocation has been removed in the Draft Gosport Plan 2042.

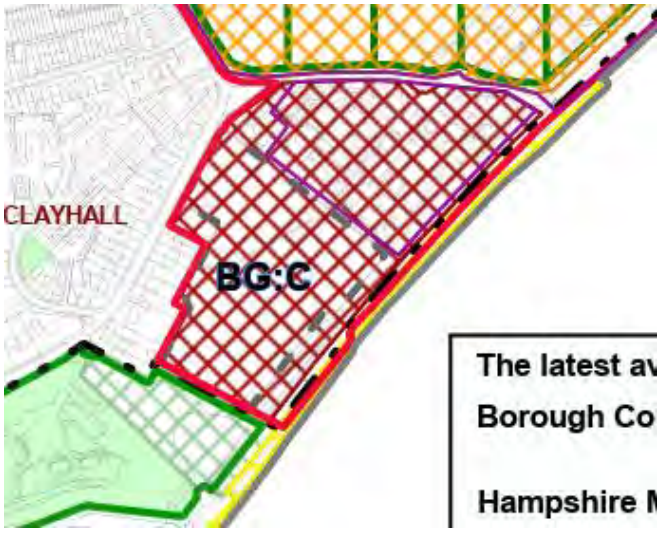



Figure 6.3 – Gosport Draft Local Plan 2038 Proposals Map Extract

6.15 The extended car park section has blended back with the landscape and is not considered to be previously developed land. It is also noted that the Draft Gosport Plan 2042 shows the urban area extending around the whole application site including the extended car park area, as shown in figure 6.4.




Figure 6.4 – Gosport Draft Local Plan 2042 Proposals Map Extract

6.16 Haslar IRC will employ a significant number of people, and the proposed expansion will create approximately 265 additional full-time jobs. Whilst not a 'typical' employment use, the proposed development will result in employment being focussed in a location consistent with the Spatial Strategy for the Gosport.

## SUSTAINABLE DEVELOPMENT

6.17 The proposals comply with the three pillars of sustainability outlined in the NPPF as follows:

- Economic Sustainability – The proposed development will deliver economic growth through the construction of the IRC expansion. The construction phase of this scheme will support the creation of new job opportunities, and once complete, the expanded IRC will create another 265 full time jobs. The employees of the IRC will help local business in terms or direct and indirect local spend. Over the lifetime of the development there will be employment opportunities associated with the upkeep and maintenance of the IRC.

- Social Sustainability – The development of the IRC expansion will provide important and urgently needed national infrastructure that will help enable the Home Office to meet its Immigration Enforcement objectives. The IRC provides the health (primary care) and well-being requirements of detained persons on site.

- Environmental Sustainability – The proposed scheme makes effective use of the site and delivers a density of development reflective of the surrounding area and promotes sustainable modes of transport including improvements to the King Charles III England Coastal Path. The indicative layout also introduces landscaping improvements. The proposed development is compliant with high standards of energy and water efficiency and exceed Development Plan requirements. The proposal will incorporate ecological mitigation and enhancement measures. The majority of existing trees will be retained and protected, and new soft landscaping will provide new trees.

6.18 A Sustainability Statement (AtkinsRealis) is submitted with the OPA. The report demonstrates preliminary compliance with the Development Plan (principally Policy LP38) and the NPPF. The report confirms that all new buildings will be developed to BREEAM Excellent standards, which exceeds the requirements of the Development Plan. The provision of solar panels within the indicative site layout has been informed by the energy strategy.

6.19 The report concludes that the proposed development has been informed with *"sustainability throughout the design process. The development fully aligns with the NPPF principles and supports the UK's net zero commitments. The development demonstrates a robust approach to sustainability, delivering environmental responsibilities, social considerations and economic benefits while meeting national policy objectives."*.

## THE DESIGN APPROACH

### Layout, Scale and Appearance

6.20 The indicative proposed site layout has been developed following pre-application discussions with the LPA and DHLUC. The proposed development will meet and exceed sustainable design standards.

6.21 The proposed accommodation blocks are the largest buildings and are necessarily located within the existing secure boundary. The location of the accommodation blocks has been moved as far southeast as possible with the single storey dining hall and CASU building located centrally to reduce the impact of the development on the landscape and the amenity of neighbouring residential dwellings. The site level falls towards the sea allowing the opportunity to introduce greater height in a less sensitive location. Thus, the indicative scheme has been designed so that where it is visible it will be an acceptable addition to the landscape.

6.22 In response to the LPA pre-application, the proposed accommodation blocks have been moved further away from the Haslar Barracks Conservation Area (a minimum of 20 metres as indicated on the Development Parameters Plan) and the indicative layout plan shows how landscaping can be introduced to soften the impact of the development on the appearance of the conservation area.

6.23 The DAS highlights that the overall height is reflective of the institutional floor to floor dimension requirements for secure custodial environments together with integrated plant on the roof.

6.24 The proposed development includes an extended car park to meet the operational requirements of the expanded IRC. Planting is proposed throughout the car park to soften the environment. An indicative lighting plan demonstrates how lighting impacts to adjoining uses and ecology can be adequately managed. Wherever possible, existing trees have been retained on the site.

6.25 Policy LP10 states that proposals will be permitted within the urban area providing that the criteria contained in the policy are met. The table below indicates how the proposed development meets

each relevant criteria and, where appropriate, criteria can be met through the Reserved Matters application:

| | Criteria | Compliance of the Proposed Development |
|---|---|---|
| A | It has a high-quality appearance in terms of scale, setting, layout, massing, landscaping, and appearance including details and materials. | Whilst these matters are reserved for future determination, the outline application includes an indicative parameters plan and an indicative layout.<br><br>Section four of the DAS explains the approach to the location of development with a substantial buffer introduced between the conservation Area and proposed development. The height of new buildings tapers down from 12m to 7m towards the adjoining Fort Road residential dwellings, thus maintaining an appropriate domestic scale. A significant proportion of the existing playing field is retained for recreational use of IRC residents thus continuing the existing use of this land. Landscaping is to be introduced in order to create a buffer between the residential and IRC uses.<br><br>Section five of the DAS explains the design response and sets out the preferred materials that would be used in the development of the IRC expansion buildings. The preference for brickwork and glazing is a response to the building materials used within adjoining developments and, in particular, the Conservation Area. |
| B | It provides, or is accessible to, high quality public spaces. | As the proposal is a secure facility, there are no public spaces proposed as part of the development. The exception to this is the proposed relocation and improvement of the existing public right of way that is necessary to avoid conflict between pedestrians and the extended car park. |
| C | It incorporates measures to protect and enhance biodiversity and landscape features. | The proposal includes measures to enhance biodiversity through a variety of measures including mitigation, which are discussed later in this chapter. |
| D | It will not significantly prejudice important townscape and landscape features. | A Landscape and Visual Impact Assessment is submitted with the application, which assesses the impact of the proposed development based upon the development parameters set out in the DAS and submitted plans. The impact on townscape and specifically, heritage is considered in the Heritage Impact Assessment submitted with the application. The location of development has been informed by this work. These matters are discussed later in this chapter. |

| | | |
|---|---|---|
| E | It will protect public views of important landscape and townscape features. | Refer to 'D' above. |
| F | It ensures measures are incorporated that improve accessibility to all users. | Section six of the DAS explains how the design approach has responded to the need for ease of movement within a secure facility, |
| G | It is accessible for pedestrians and cyclists and is well connected to local facilities via links with pedestrian and cycle routes. | The proposed development is designed to be fully accessible to both pedestrians and cyclists. The development incorporates additional cycle parking for staff and visitors. Pedestrian pathways are intentionally segregated from vehicular traffic creating a comfortable environment to help users navigate the space whilst enhancing overall safety and legibility. |
| H | It is well connected to public transport routes. | The application site is reasonably well connected to public transport routes, and the proposed development will include the provision of a bus for visitors to the site. |
| I | It is easy to move through with safe and recognisable routes, intersections and landmarks. | Refer to 'G' above. |
| J | It creates a safe environment where crime and disorder and fear of crime does not undermine quality of life or community cohesion. | The IRC is a secure site. Matters relating to the fear of crime are discussed later in this chapter. |
| K | It does not cause harm by reason of:<br>i) loss of light, privacy or outlook;<br>ii) noise, light pollution, vibration, smell, or air pollution; or<br>iii) other adverse impacts. | The proposed development will not result in any harm in relation to rights of light due to the height, location and orientation of the proposed development. Whilst the new buildings will be partially visible from outside the site, this will be from behind an existing 5.2m fence and landscaping introduced behind the fence to soften the appearance of the development. The topography of the site also slopes gently towards the sea which reduces the impact further. The majority of the site will remain in use as a recreational area with landscaping reducing views into and from this area.<br><br>The application is accompanied by an indicative lighting plan, noise assessment and air quality assessment, which consider amenity issues and are discussed later in this chapter. |

| | | |
|---|---|---|
| L | It minimises its impact on climate change and is resilient and adaptable to its effects. | The proposed development aims to achieve BREEAM Excellent in line with Home Office objectives and this is explained within the accompanying Sustainable Energy Assessment. |
| M | It meets nationally described standards for sustainable construction. | Refer to 'L' above. |
| P | it makes the most efficient use of the site and does not prevent the comprehensive development of that site and any adjoining land. | The proposed development is for the expansion of an existing IRC. The approach to the site's development has been comprehensive. |

6.26 The DAS and the summary table above demonstrate that the approach to the site layout, scale and appearance is in accordance with prevailing policy.

**Suitable accommodation for Detained Persons**

6.27 The organisation and massing of the proposed building have been carefully considered to create a safe, secure, and well-managed environment. The coherent and legible layout supports clear wayfinding through easily identifiable routes and sightlines, offering transient occupants a natural sense of orientation both internally and externally. Outdoor recreational courtyards are strategically positioned to benefit from a south-facing aspect, while landscaped gardens are located to the north, enhancing amenity and visual quality.

6.28 All rooms in the IRC will meet the standards as set out in the accommodation standards Detention Services Order 06/2018 (DSO). DSO sets out requirements for accommodation to comply with Rule 15 of the Detention Centre Rules 2001.

6.29 This includes size, lighting, heating, ventilation and fittings that are adequate for health, as well as, it has adequate storage facilities (consistent with the interests of security and safety and it allows a detained individual to communicate with an officer at any time.

6.30 DSO does not set out size requirements, but room should be sufficient to accommodate at least one single bed, storage for personal possessions, a chair and use of a table and space for circulation and movement. The proposed rooms are between 9 sq. m. and 11 sq. m. All accommodation will have heating, lighting and ventilation to the technical standards set out in DSO. The requirements for the size of DSO are met for suitable and humane accommodation.

6.31 All wider facilities, such as education, healthcare and faith related facilities will be entirely contained within the site and proposed to Home Office standards. In relation to the proposed development, this will comprise:

- New accommodation blocks with single and double occupancy rooms – increased room sizes.
- Integral toilets and basins in new-build rooms
- Dedicated spaces for healthcare, faith, education and recreation
- Fitness suites, TV room, and cultural kitchens
- DDA-compliant rooms

6.32 The indicative floor plans demonstrate how the design standards can be met.

### Access and Parking

6.33 The OPA seeks detailed planning permission for access. The proposal retains the existing access from Dolphin Way onto Fort Road and the extended car park at Fort Road will retain the existing access with some minor improvements within the car park to enable improved visibility and circulation. The access plan demonstrates that the existing access can operate safely.

6.34 Within the site on Dolphin Way there is an existing security barrier, which will remain place. This is shown within section four of the DAS. The existing emergency access on Fort Road is also retained, as is the vehicular access to the Haslar Sea Wall Car Park located off Fort Road. An additional access is proposed from the car park to the IRC on the western boundary.

6.35 The Site Access Strategy Plan shown in the DAS indicates the areas where the site residents will have access and those areas which are restricted to staff use.

6.36 The proposed highway layout is assessed in the Transport Assessment prepared by Stantec. The layout of the proposed development has been designed to ensure safety and ease of access and movement for all users, including pedestrians and cyclists.

6.37 The proposed development extends parking provision from 93 to approximately 300 car parking spaces (including Dolphin Way and Haslar Sea Wall Car Park). The amount of disabled and EV charging spaces will comply with Local Highways Authority requirements. The indicative layout shows how the level of car parking can be provided. Sheltered cycle parking is proposed with 26 cycle spaces provided in the new car park, with an additional 18 spaces to be provided close to the Dolphin Way entrance.

## LANDSCAPE AND VISUAL IMPACT

6.38 The NPPF and Development Plan require landscaping to be effective and contribute towards making developments visually attractive.

6.39 As established, the indicative proposal incorporates private amenity spaces within the IRC and landscaping across the site. AtkinsRealis prepared an indicative landscaping plan to support the application. The landscape plan provides low level planting around the boundary with the adjoining residential properties on Fort Road and around the expanded car park site. Additional landscaping is also introduced along the public right of way and throughout the car park to break up and soften the car parking area. The visual barrier will comprise higher level planting and potentially tree planting to soften the appearance of the development from outside of the site. The landscape strategy will ensure that all areas of landscaping are attractive and effectively improve the proposed development as far as possible. The landscaping plan has been informed by the Landscape and Visual Impact Assessment (LVIA) also submitted with the application.

6.40 An LVIA is submitted with this application and was prepared by UBU Design. The LVIA assesses the landscape setting itself and secondly the visual impact of the proposed development on the surrounding areas from which views are possible.

6.41 The LVIA concludes that *"that there will be no long term significant adverse effects arising as a result of the proposed development apart from a major/moderate adverse effect for the limited dwellings on the southeastern side of Fort Road backing onto the site. Furthermore, the proposed development will provide the opportunity for landscape and biodiversity enhancements to the site."*

6.42 In relation to Local Plan policy, the LVIA concludes that *"The development proposals are in accordance with Gosport Borough Council's Local Plan...The proposed development has been designed with a sympathetic layout which respects the character of the local built environment and local historic assets. The proposals provide the opportunity to further respect the character of the local built and natural environment and the setting of local historic assets, improving the*

*character and quality of the area, through sympathetic detailed design and materials to respect the local context, and through the provision of a landscape framework and the opportunity to incorporate new planting, enhancing biodiversity and incorporating new landscape features.*

*Landscape and visual mitigation features such as new tree planting, biodiversity features and a considered landscape framework across the site, will enable the development to integrate into the local landscape character of the area, improve the immediate landscape condition, and provide benefits to the biodiversity of the site."*

## TRANSPORT

6.43 The Transport Assessment prepared by Stantec demonstrates that the proposed development is not expected to generate vehicle trips in the AM peak and only four two-way trips in the PM peak. Sensitivity analysis of the existing road junctions confirmed that after the development, all junctions operated well within capacity.

6.44 The Transport Assessment concludes that *"the proposed development would not have a severe impact upon the operation of the local highway network. Based on the findings within this TA and in the context of the guidelines within paragraphs 115 & 116 of the NPPF, it is considered that there are no transport-related reasons why the development should not be permitted."*

6.45 An Outline Environmental Management Plan prepared by AtkinsRealis is submitted with the application. It is anticipated that construction traffic can be managed through the submission of a Construction Environmental Management Plan (CEMP) that would be required as a pre-commencement condition.

6.46 The proposed development will provide improved site access and parking as required by the Development Plan. It is considered the site has a good level of accessibility by sustainable modes of transport.

6.47 A Travel Plan is submitted with the application and includes measures to encourage increased sustainable travel by staff and visitors.

## ECOLOGY AND BIODIVERSITY NET GAIN

6.48 NPPF encourages the protection and enhancement of biodiversity, and minimising impacts. The Development Plan requires a net gain in biodiversity, protection of trees, and reuse of soil, incorporation of features to encourage biodiversity. Applicants are required to undertake habitat surveys where protected species are affected.

### Ecology

#### Ecological Impact Assessment

6.49 An Ecological Impact Assessment (ECIA) has been prepared by First Horizon and is submitted as part of this submission. As part of the assessment process the applicant has engaged with Natural England and the County Ecologist. The ECIA and detailed species surveys informed the development proposals on the site. The following key ecological features and associated recommendations have been identified:

- Solent/Portsmouth Ramsar, Solent & Isle of Wight Lagoons Special Areas of Conservation (SAC), Solent & Southampton Water, Portsmouth Harbour, Solent and Dorset Special Protection Areas (SPA) and associated Sites of Special Scientific Interest (SSSIs), Green Infrastructure, Ecological Network & Solent Waders and Brent Goose Strategy (SWBGS). The site lies within the zone of influence for the designated areas and the southwestern extent of the site is a designated 'core area' within the SWBGS.

- Bats – no bat roosts were identified within the application site. A sensitive lighting strategy has been developed by the applicant to manage any potential impacts and is submitted with the application.

- Badger – no setts are on site, but there is activity in the local area. The applicant is proposing to manage any potential impacts with standard sensitive construction practices.

- Breeding Birds – the applicant proposes initial clearance/construction to be programmed outside of the nesting season, or if necessary, within the March to August window an Ecological Clerk of Works (ECoW) will supervise/ directly inspect sensitive works.

- Common Reptiles – the applicant has identified a small population of Common Lizard and proposes sensitive clearance under supervision of ECoW.

- Priority Species – the applicant has identified limited opportunities for species and proposes sensitive clearance under supervision of ECoW.

6.50 The ECIA sets out mitigation measures, which include SWBGS off setting and mitigation for nutrient neutrality. A Stage 1 Habitat Regulations Assessment and Stage 2 Appropriate assessment was also completed by First Horizon and is submitted with the OPA.

6.51 The ECIA concludes that *"if the outlined mitigation measures are implemented in full, no significant residual impact is expected. The proposed application can result in 'no net loss in biodiversity,' and maintenance of favourable conservation status of resident species, whilst also providing opportunities for 'biodiversity net gain' in accordance with NPPF and Local Planning Policy."*

### Habitat Regulation Assessment

6.52 The HRA concludes that *"a total of six designated sites have been identified within the zone of influence. All qualifying features associated with these have been assessed. Through Stage 1 HRA assessment of the information available, a number of likely significant effects have been identified both during the construction phase and operation of the site. Potential in-combination effects with all other local applications have also been identified. Loss of Functionally Linked Land [FLL] utilised by wintering birds is the most significant, alongside potential hydrological Nutrient Neutrality effects.*

6.53 *The subsequent Stage 2 AA has detailed avoidance/mitigation/compensation measures necessary to result in no residual effect. This is on the basis that: Hydrological impacts during site operation will be avoided/compensated through implementation of Natural England's Solent Nutrient Neutrality Advice (use of Stubbington Reserve); and that Loss of FLL utilised by wintering birds, will be compensated through the implementation of the Solent Wader and Brent Goose Strategy (SWBGS): Guidance on Mitigation and Off-setting Requirements (also use of Stubbington Reserve).*

6.54 *The HRA/AA demonstrates that the requirements of Regulations 63 and 64 of the Habitats Regulations have been fully considered and will allow the competent authority to undertake an HRA Screening exercise & Appropriate Assessment and reach the same conclusion as detailed within this report i.e. ultimately no significant residual effect upon any statutory designated site/qualifying feature or associated functionally Linked Land."*

6.55 The applicant has agreed a mitigation package for the replacement Brent Geese Habitat, which has been achieved through the following agreements, which are submitted with the OPA.

- Agreement relating to Brent Geese Mitigation entered into by (1) Wild Capital 1 PropCo 7 Limited (Wild Capital) and (2) The Secretary of State for the Home Department (Mitigation Agreement); and

- Conservation covenant agreement relating to Solent Waders and Brent Goose Strategy Mitigation Site entered into by (1) Wild Capital and (2) RSK Biocensus Limited (Conservation Covenant)

6.56 A mitigation strategy has been agreed that will include the creation of Stubbington Brent Geese Reserve. Details of the reserved are contained within the Stubbington Habitat Management and Monitoring Plan (1st Horizon, 2024). This will be an area of Perennial Rye-grassland of approximately 12.6Ha which will provide adequate compensation for loss of land throughout the entire application footprint (parcel G63). For loss of 2.75Ha parcel G63, a total of 5.5Ha mitigation credits will be utilised (2x multiplier of what is to be lost). It will provide a grassland sward between 5-12cm all year round and provide a food source for overwintering birds including Brent Geese. It will be secured from public disturbance by fencing.

6.57 The applicant has also assessed the need for hydrological nutrient neutrality and has followed Natural England's Advice Note. A Nutrient Neutrality (NN) strategy has been confirmed by the applicant and will include the inclusion of credits from Knowle STW Wetland Treatment Scheme (being developed by Albion Water).

6.58 The applicant has a signed Allocation Agreement (between Albion Water Limited and the Secretary of State for the Home Department), which is submitted with the OPA.

**Trees**

6.59 First Horizon has undertaken a tree survey on to assess the condition of the existing trees on this site and an Arboricultural Impact Assessment (AIA) together with a Method Statement to test the impact of the indicative proposed layout.

6.60 The AIA concludes that the indicative proposed layout requires the removal of 9 individual trees (category C or below).

6.61 The applicant's approach to site design was to consider the presence of trees, particularly the highest quality, and where feasible seeks to incorporate them within any proposed development.

6.62 There are opportunities highlighted by the AIA for the retention of more existing trees, which can be considered at the Reserved Matters Application stage. The AIA concludes that *"the loss of trees associated with the development should be mitigated through the planting of 13 new trees and 3 new Hawthorns, reflecting a proportional replacement strategy based on the number and quality of trees removed.*

**The BNG provision**

6.63 A baseline habitat assessment and metric calculation for BNG have been prepared by First Horizon. Due to the scale of the development and the limited area within which to include substantial biodiversity enhancements, it was concluded that to provide 10% BNG would require off site provision. Accordingly, the applicant has identified and secured BNG credits that will provide the full 10% BNG required by legislation. This will be provided in addition to on-site biodiversity improvements.

6.64 A BNG Assessment is submitted with this application. It concludes that based upon the indicative proposed plan and development parameters, the development results in a net loss of 25.81 units. It identifies the amount of Biodiversity Units (BU) required to meet the targeted 10% BNG is 28.81 habitat units and 0.07 linear units.

6.65 In accordance with the recommendations, the applicant has identified a BNG provider and has agreed a unit pre-purchase of the full amount of BU calculated in the net gain assessment.

## FLOOD RISK AND DRAINAGE

6.66 The NPPF directs development to areas at the lowest risk of flooding. It requires planning applications to demonstrate that flood risk is not increased elsewhere. In locations such as the application site, it requires evidence to demonstrate that the Sequential Test and Exception Test are both met. It also requires site drainage to include SuDS that control runoff and offer multifunctional benefits such as improved water quality, biodiversity, and amenity. For major developments, SuDS must meet operational standards, include maintenance arrangements, and reflect advice from the

Lead Local Flood Authority. Development Plan policies LP39 and LP45 establish planning application requirements.

6.67 The application site is located in Flood Zones 1,2 and 3 (ranging from low risk to high risk from flooding).

6.68 The Flood Risk Assessment (FRA) was undertaken by First Horizon and is submitted with this application together with a Drainage and SuDS Strategy. The FRA is informed by an up-to-date Coastal Modelling Assessment and accompanied by a Flood Evacuation Plan.

6.69 The FRA concludes the following

- The risk of tidal flooding is negligible for most of the site. The central extent of the site up to the northwest extent has a moderate risk of tidal flooding.
- Most of the site has a low risk of groundwater flooding. The northern boundary of the site has a moderate risk, and the east boundary has a negligible risk of groundwater flooding.
- There are two areas of potential high risk surface water ponding in the north of the site.
- Flood risk can be mitigated to a negligible and acceptable level through raised finished floor levels, the creation of a flood resilient way, the production of a Flood Evacuation Management Plan (submitted with the OPA) and adoption of surface water management strategy.

6.70 In relation to surface water, the FRA demonstrates *"that surface water can be managed, such that flood risk to and from the Site following development will not increase. This will be achieved through restricted discharge rates and cellular storage as well as lined permeable paving, swales and filter drains. The strategy requires a pumped solution due to levels in the Site."*

6.71 The need for the proposed development is set out within section five of this planning statement and the approach to site selection is set out in appendix D of this Planning Statement. The expansion of existing IRC's is considered the preferred approach to providing nationally important infrastructure. Accordingly, it is considered that the Sequential Test is met because the application site is sequentially preferable site by virtue that it is an extension of an existing facility. It is arguable that the Sequential Test is inappropriate in this case, however, it has been carried out by the applicant.

6.72 In any event, even if it were considered that the Sequential Test was not met, the benefits of the proposed development are considered to outweigh the potential failure of the test and this is a key consideration, as established in the Gladman[8] decision.

6.73 The FRA establishes design requirements to ensure the development will be safe for its lifetime and not increase flood risk elsewhere. The NPPF advocates a proportionate approach to the Sequential Test when applied to surface water flooding and states that *"Where a site-specific flood risk assessment demonstrates clearly that the proposed layout, design, and mitigation measures would ensure that occupiers and users would remain safe from current and future surface water flood risk for the lifetime of the development without increasing flood risk elsewhere, then the sequential test need not be applied."* The FRA demonstrates such measures and, therefore, the Sequential Test does not need to be applied in relation to surface water flood risk.

[8] Gladman Developments Ltd v Secretary of State for Housing, Communities and Local Government and Lancaster City Council (15 January 2026)

6.74 The FRA confirms that the proposed use is classified as 'more vulnerable' and therefore the exception test should be applied.

6.75 The NPPG[9] provides examples as to how can it be demonstrated that wider sustainability benefits to the community outweigh flood risk. The proposed development is consistent with the examples give. Specifically, it proposes the re-use of suitable brownfield land to meet a nationally important need.

6.76 The exception test is considered to be passed, as the IRC extension will provide wider sustainability benefits to the community, as summarised in the conclusions of this Planning Statement and evidenced in section five for this statement. These benefits outweigh the flood risk and the FRA demonstrates that development will be safe for its lifetime taking account of the vulnerability of its users, without increasing flood risk elsewhere.

6.77 Accordingly, the proposed development is in compliance with the Development Plan and the NPPF.

### IMPACT ON LOCAL POPULATION AND RESIDENTIAL AMENITY

6.78 The application site adjoins several residential properties situated to the south of Fort Road and neighbours a wider residential area immediately north of the IRC. The relationship between the application site and the residential uses is long established although it is noted that the IRC remained closed for a period of approximately ten years.

6.79 The boundary of the IRC comprises an existing 5.2m security fence, which is located very close to the boundary of the adjoining residential properties. The fence also runs along the boundary with Fort Road and is overlooked by residential properties on the north side of Fort Road.

6.80 The proposed development retains the existing security fencing (some maintenance and improvements may be required) and will introduce some additional screening within the IRC and low-level landscaping surrounding the boundary with the residential properties.

6.81 West of the application site is Gosport and Stokes Bay Golf Course, which shares an access with the Haslar Sea Wall Car Park. The golf course surrounds Fort Monckton, which is located to the south. East of the site is the strategic Haslar Peninsula site. The land closest to the application site is currently vacant.

6.82 The impact on the local population and residential amenity has been carried out through a series of assessments submitted with the OPA. Specifically, this includes:

- Air Quality Impacts – Air Quality Assessment
- Noise Impacts – Noise Assessment
- Health Provision – Local Community Impact Assessment
- Fear of Crime / Community cohesion – Local Community Impact Assessment
- Economic Effects – Local Community Impact Assessment

[9] Paragraph: 036 Reference ID: 7-036-20220825

### Air Quality

6.83 In support of this application, First Horizon has prepared an Air Quality Assessment to assess potential air quality impacts associated with the proposed IRC expansion.

6.84 The assessment concludes that modelling shows current concentrations of all pollutants are below the national air quality objectives.

6.85 The assessment suggested a range of mitigation measures for the construction phase, which can be secured via an appropriately worded planning condition.

6.86 The assessment concludes that the proposed development adheres to national, regional and local planning policy, and therefore that air quality concerns should not be a constraint on the proposed development.

6.87 Given the above, the proposed development accords with the guiding principle of the NPPF and the development plan.

### Noise

6.88 In support of this application, First Horizon has prepared a Noise Assessment to assess potential noise impacts associated with the proposed IRC expansion.

6.89 The results of a baseline environmental noise survey undertaken at the Site were used to inform an assessment of the suitability of the site for the proposed extension.

6.90 The assessment concludes that *"the cumulative plant noise impact from the existing IRC and expansion of the IRC plant remains acceptable, with no significant adverse effect anticipated at nearby dwellings and no resulting harm to residential amenity."*

6.91 Given the above, the proposed development accords with the guiding principles of the NPPF and the development plan.

### Light

6.92 The NPPF requires developments to limit the impact of light pollution from artificial light on local amenity, intrinsically dark landscapes and nature conservation.

6.93 A lighting assessment prepared by Atkins Realis has informed the indicative layout and an indicative lighting plan is submitted with the OPA to demonstrate how the operational lighting requirements can be developed without having an unacceptable impact on amenity.

6.94 The assessment notes that external amenity lighting is required to be provided to all access roads, outdoor spaces, building perimeter, roof plant, car parking areas and pedestrian/vehicular entrances. Lighting within the site is also required for security purposes. The assessment states that "*The proposed indicative lighting scheme will be developed with consideration for all relevant planning policies…This includes limiting the impact of light pollution from artificial light on local amenity, intrinsically dark landscapes and nature conservation."*

6.95 The assessment recommends that "*Any impacts arising from the proposed lighting scheme shall be assessed, and any required mitigation agreed with Natural England" and the Local Planning Authority".*

### Health

6.96 Paragraph 96 of the NPPF requires that planning decisions should aim to achieve healthy places and development should enable and support healthy lives by providing adequate sports facilities and meet local health needs.

6.97 The existing IRC contains recreation space and will be complemented by additional informal recreation space proposed within the secure area of the IRC.

6.98 The proposed development includes an extended facility that will provide the following health care for the increased number of detained persons within the site:

- Primary care – GP and nurse clinics with enhanced first response capabilities
- Dentistry
- Mental health services for staff and detained persons

6.99 Emergency care will be routed to local hospitals only in exceptional cases. This approach is designed to minimise pressure on local NHS services by ensuring detained persons receive comprehensive care on-site.

**Fear of Crime / Community Cohesion**

6.100 Paragraph 96 of the Framework indicates that planning decisions should aim to achieve inclusive and safe places which are safe and accessible, so that crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion.

6.101 The IRC is a secure facility, and detained persons are not allowed to leave the facility, which is to open in 2027. The security measures within the site will be extended to meet the operational requirements of the expanded IRC. It is, therefore, unlikely that the proposed development and its operation will give rise to the fear of crime.

6.102 Case law has determined that fear of crime and anti-social behaviour can be a material consideration. However, there must be some reasonable evidential basis for that fear, and the object of that fear is the use, in planning terms of the land.[10]

6.103 In this case, the proposed development is an intensification of a use (i.e. the expansion of an IRC) and not a change of use. Whilst there may be concern amongst members of the local community about the proposed development, the relevant questions are whether those fears and concerns have a reasonable basis in evidence and whether they can properly be said to be grounded in the expansion of the existing use of the site as an IRC.

6.104 A planning appeal decision (ref: APP/A2280/W/23/3315258) allowed permissions for the proposed change of use of student accommodation to asylum seeker accommodation in Stafford. Whilst numerous objections were raised by local residents, including concerns about crime and anti-social behaviour, the Inspector found that fear of crime, though a material planning consideration, was not supported by substantive evidence in this case.

6.105 Police and other consultees had not objected, and no compelling data demonstrated that the proposal would lead to increased crime or disorder. The Inspector acknowledged that **local** fears were genuinely held but concluded they carried only limited weight in the planning balance.

6.106 The applicant has engaged with Hampshire Police through the design process and will continue to do this as the detailed design of the proposal evolves.

6.107 It is recognised that there were previously protests regarding the operation of the IRC and there is potential for such protests to take place again and following the expansion of the IRC. Typically,

[10] Smith v FSS [2006] JPL 386

protests were in response to national immigration policy. While such demonstrations represent a legitimate form of civic engagement, they may contribute to increased perceptions of disorder and heightened concerns around public safety, particularly when amplified by media coverage or existing local tensions. The IRC manager, in coordination with local police authorities, will be responsible for managing any such events to ensure public order is maintained and community reassurance is prioritised.

6.108 The IRC site has a procedure put in place to manage site security and protests and regularly liaises with Hampshire Police. This process will continue when the expansion takes place.

6.109 Security staff provide a 24/7, 365-day presence at the site and this arrangement will be in place prior to the IRC operating contract being in place. All security personnel will be appropriately licensed and security vetted. Access and egress to the site will be controlled by the security team, and all access gates in use are staffed and secured at all times. There will be a combination of fixed and mobile CCTV across the site, with coverage focused on the access points.

6.110 There is no statistically relevant evidence to support the claim that IRC will increase crime in the local area.

6.111 The Home Office will ensure there are open channels of communication available with the community to ensure they are able to raise any concerns, including those relating to security.

### Economic effects

6.112 It is anticipated that the construction phase will create 491 additional construction jobs (refer to Local Community Impact Assessment). This employment boost has the potential to provide opportunity to local people who are currently unemployed or with poor labour market contributions, as well as through apprenticeship opportunities providing wider social value in the area. In addition, a further 364 net additional jobs are anticipated as a result of the construction of the proposed development.

6.113 The Gross Value Added (GVA) uplift for the construction of the scheme can be estimated at approximately £19.7 million per annum reflecting the net direct and indirect employment in the local authority.

6.114 It is anticipated approximately 265 net additional jobs could be generated across the operational phase the development is completed. This employment level has the potential to provide opportunity to local people who are currently unemployed or with poor labour market contributions.

6.115 The applicant has confirmed in pre-application discussions that it is prepared to agree to Gosport Council's Skills and Training Plan requirements.

### Contamination

6.116 The Development Plan (Policy L47) requires adequate measures to be taken to remove the threat of contamination, confirmation development is not likely to result in contamination of underground or surface water resources. The NPPF requires that a site is suitable for its proposed use taking account of ground conditions and any risks arising from land instability and contamination.

6.117 A Phase 1 Ground Investigation Report has been prepared by First Horizon and phase 2 Ground Investigations have been carried out on the site with the exception of the existing car park site. The reports confirm *"there is a low risk of ground gasses to the proposed development. There is no evidence of any hydrocarbon storage or spills on the site and no elevated TPHs or PAHs were found. No radon protective measures are required."*

6.118 The report identified that *"there is high risk to site users from elevated lead concentrations resulting from historical activity on the site. The sources identified as in the risk assessment and the associated risks were addressed during the phase 2 ground investigation undertaken in 2023 and concluded that*

*a remediation strategy and subsequent verification report will be required upon completion of the clean cover system."* This can be secured by way of a suitable worded planning condition.

**Unexploded Ordnance (UXO)**

6.119 A UXO report has been produced by First Horizon. The report concludes that UXO poses a low-moderate and moderate risk to the proposed works. It sets out a mitigation strategy and mitigation measures that can be put in place when carrying out works on site. This will inform the detailed Construction Management Plan that will need to be approved prior to commencement of development.

**Heritage and Archaeology**

6.120 Section 16 of the NPPF specifies that where a site on which development is proposed includes, or has the potential to include, heritage assets with archaeological interest, local planning authorities should require developers to submit an appropriate desk-based assessment and, where necessary, a field evaluation. Development Plan Policies LP11 and LP12 establishes requirements for new development where the built and historic environment are relevant.

6.121 The Site lies adjacent to the Haslar Barracks Conservation Area, and the access route to the IRC extensions crosses through it. The site is located close to Fort Monckton Scheduled Ancient Monument.

6.122 It is recognised that great weight should be given to the conservation of designated heritage assets. Where a development proposal leads to less than substantial harm, this should be weighed against the public benefits of the proposal.

6.123 A Heritage Impact Assessment by Wessex Archaeology concludes that *"the proposed development will have no direct impacts on any designated heritage assets. This assessment has also found that due to the embedded mitigation measures and the incorporation of Historic England's recommendations, the proposed development will have no impact on the significance of any designated heritage assets, including Haslar Barracks Conservation Area and Fort Monckton Scheduled Monument.*

*Furthermore, the scheme would further result in the continued maintenance of the Locally Listed Buildings within the Conservation Area. As a result, this assessment has found that the proposed development would result in no harm to the significance of the Conservation Area".*

6.124 The Heritage Assessment concludes the proposed development would have no harm to designated heritage assets. In any case, even it was concluded that the proposed development would result in less than substantial harm to the Conservation Area by reason of setting impacts, the public benefits associated with the proposed development would clearly outweigh the harm.

6.125 An archaeological Desk Based Assessment by Wessex Archaeology is submitted with the OPA. The assessment concludes that *"there is an archaeological interest within the Site. This is defined as the potential for the presence of buried archaeological remains related to 19th and 20th century military installations to be present. However, the GI works and archaeological watching brief already undertaken within the Site indicates that there is only a low potential for such remains to have survived within the Site and for the proposed development to result in harm to any archaeologically significant remains. Any adverse impact to buried archaeological features as a result of the implementation of the development proposals would be permanent and irreversible in nature. This potential adverse effect could be reduced through the implementation of an appropriate scheme of archaeological mitigation, in accordance with national and local planning policy."*

6.126 Given the above, the proposed development accords with the guiding principle of the NPPF and the Development Plan.

## PLANNING OBLIGATIONS DRAFT HEADS OF TERMS

6.127 In addition to the range of planning benefits that the proposed development will deliver, it is anticipated that an appropriate package of planning obligations may be negotiated and agreed with the Council in accordance with the statutory tests contained at Paragraph 58 of the NPPF.

6.128 Pre-application discussions with the LPA indicate that the submission of a Skills and Training Plan could be dealt with by an appropriately worded planning condition.

6.129 The Head of Terms may include the following:

- Travel Plan to Hampshire County Council as Highways Authority.
- Monitoring fees to Hampshire County Council as Highways Authority.

6.130 It is considered that the existing agreements providing ecology mitigation (Brent Geese Habitat Mitigation, Biodiversity Net Gain and Nutrient Neutrality Credits) can be enforced through appropriately worded planning conditions.

# 7. Conclusions

7.1 This Planning Statement has been prepared in support of an outline planning application by the Home Office for the development of an extension to Haslar Immigration Removal Centre on the existing site at Fort Road on the Haslar Peninsula ('the site').

7.2 This submission seeks outline planning permission with all matters reserved apart from access the following development proposal:

*"Outline Planning Application with all matters reserved (except for access) for the expansion of Haslar IRC comprising the development of new accommodation blocks and ancillary supporting accommodation, the conversion and expansion of existing site infrastructure, demolition of existing structures, creation of additional car parking, landscaping and associated site infrastructure."*

7.3 The proposed development will result in a number of key planning benefits, including:

- The development of nationally important infrastructure to expand the capacity of Immigration Removal Centres to meet the Government's immigration enforcement requirements.
- Creation of new job opportunities during the construction phase of this scheme.
- Additional full time employment opportunities during the lifetime of the development.
- A modern IRC facility that meets the Governments design standards, which will be built to BREEAM Excellent standards.
- Significant planting and landscaping across the site and wider area to protect and encourage wildlife and biodiversity in addition to 10% biodiversity net gain provided off site.
- Dedicated parking and covered cycle parking provision including EV charging provision.
- Architecture and materials that will reflect the character and appearance of the wider area.

7.4 This Statement has assessed the material considerations arising from the proposals against the NPPF and the prevailing planning policy framework, and has demonstrated that the scheme complies with the relevant national and local planning policy and guidance.

7.5 The applicant has also demonstrated there is an urgent and pressing need for the provision of additional IRC accommodation, as set out in section five of this statement. The site is the most appropriate location for providing additional IRC accommodation, as evidenced within appendix D of this statement. Therefore, it is considered that the proposed development is in compliance with the Development Plan.

7.6 Accordingly, in accordance with NPPF paragraph 11 we respectfully request that this outline application is approved.

## Appendix A: Site Planning History

| Planning Proposal | Planning reference | Planning type | Decision |
|---|---|---|---|
| Development of a substation and energy centre, including gated vehicular access, flood barrier, fencing and associated infrastructure | 24/00382/FULL | Full | Approved |
| Demolition of boiler house | 24/00352/DEMO | GDPO Part 11 | Approved |
| Demolition of store building | 24/00349/FULL | Full | Approved |
| Installation of solar panels | 24/00016/P14JPA | GDPO Part 14 | Prior approval not needed |
| Demolition of some ancillary buildings and structures within a conservation area | 23/00346/FULL | Full | Approved |

# Appendix B: IRC Refurbishment Works

The refurbishment works to enable the reuse of the existing IRC includes the refurbishment and redevelopment of buildings on site (comprising repairs to the external façade of the buildings with like-for-like materials) together with the installation of permanent ancillary accommodation (healthcare building (524 sq. m) and kitchen extension (246 sq. m)). In addition, the works comprise:

- Construction of nine new car spaces in addition to existing car parking on Dolphin Way.
- Permanent clearance of 1.37ha of former playing fields in preparation for the substation and energy centre.
- Installation of an attenuation tank as part of the Proposed Development's sustainable drainage system (SuDS)
- Installation of a substation and energy centre with an associated 18,700 litre usable capacity fuel tank (located within the footprint of Phase Two
- Installation of rooftop solar photovoltaic panels
- Landscaping.

The refurbishment works will create up to 130 bed spaces (formerly 198)

The works will upgrade the existing buildings' rating from a BREEAM "good" to "very good".

The works have been developed under permitted development rights with the exception of the following elements:

- Demolition of ancillary buildings and structures within a Conservation Area. (ref: 23/00346/FULL).
- Replacement fencing, which requires planning permission (a planning application for the replacement fencing has been recently submitted to the Local Planning Authority).
- Development of an energy centre and sub-station, which was granted planning permission on 4th June 2025 (ref:24/00382/FUL).
- Installation of solar panels. Gosport Borough Council has confirmed that prior approval is not required (ref: 24/00016/P14JPA).

## Appendix C: LPA Pre-Application Advice

GOSPORT
BOROUGH COUNCIL

**Development Management**

Home Office
C/O [redacted]
Cushman & Wakefield
1 Colmore Square
Birmingham
B4 6AJ

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

Phone: 023 9254 5645
Email: planning@gosport.gov.uk

Dear Sir/Madam

**Pre-Application No. P.103/026/25**
**PROPOSED PHASE 2 DEVELOPMENT COMPRISING 4 THREE STOREY AND 2 SINGLE STOREY BUILDINGS TO PROVIDE 470 ADDITIONAL BED SPACES OF DETENTION ACCOMMODATION AND ASSOCIATED FACILITIES INCLUDING 230 SPACE CAR PARK**
**Immigration Removal Centre 2 Dolphin Way Gosport Hampshire PO12 2AW**

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

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

**Policies**

Gosport Borough Local Plan 2011 - 2029

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

Gosport Borough Council is committed to equal opportunities for all.
**If you need this document in large print, on tape or CD, in Braille or in another language, please ask.**

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

Supplementary Planning Documents
Gosport Borough Council Design Guidance: Supplementary Planning Document: February 2014
Gosport Borough Council Parking: Supplementary Planning Document: February 2014
Gosport Borough Council Policy Guidance Note: Securing Employment and Training Measures through planning obligations April 2012

National Planning Policy Framework (NPPF), December 2024

**Comment**

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

General Principles

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

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

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

*Design and Heritage*

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

*National Planning Policy Framework – Achieving well-designed places*

Paragraph 131 of the NPPF sets out:

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

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

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

Paragraph 137 recognises the importance of the quality of design:

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

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

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

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

*Gosport Borough Local Plan 2011-2029*

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

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

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

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

**Point 1** of policy **LP10: Design** sets out an overall policy approach in relation to design as follows:
*a) planning permission will be refused for development of poor design that fails to take the opportunities available for improving the character and quality of an area and the way it functions;*
*b) new development should be well-designed to respect the character of the Borough's distinctive built and natural environment including its heritage assets and their setting;*
*c) historic assets should be conserved and where possible enhanced in a manner appropriate to their significance;*
*d) proposals for development must be based on sound supporting evidence.*

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

*'The proposed development has incorporating recommendations from Historic England and*

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

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

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

Attention is drawn to the Haslar Barracks CA Appraisal, p.22:
*'The broader setting of the Conservation Area: The surrounding land.*
*'... The western boundary to the site should retain a landscaped strip of land between the existing buildings and any future development to its south-west: possibly with consideration given to tree planting and a footpath link to the waterfront to ensure a degree of separation.* ***Any development would need to have regard to the context of the Barracks site to ensure it would not be overbearing in form or harm its setting.'***

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

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

<u>Flood risk and coastal erosion</u>

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

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

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

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

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

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

*Sequential Test*

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

*Exception Test*

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

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

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

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

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

*Modelling*

The Coastal Partners have provided some helpful detailed comments in relation to the coastal modelling outputs, it is recommended the applicant takes on board their advice. The Council also strongly recommends the applicant consults the Environment Agency including the EA's national flood modelling team regarding the modelled scenarios. Details relating to this engagement could be included in the final FRA and would serve to give the decision maker confidence that flood risk is fully understood and accounted for and to ensure greater confidence in informing any proposed mitigation measures. The applicant's flood modellers will also need to consider the work undertaken in the PfSH SFRA (2024) as this work updates the East Solent Coastal Model using the current CCA's and provides a new tidal boundary to 2122. The PfSH SFRA is available on the Council's Local Plan evidence page under Flood Risk and Coastal Erosion at: https://www.gosport.gov.uk/gblp2040evidence It is noted that in Table 2.4: Peak Tidal Levels used in the model (mAOD) that the 200-Year + Higher Central Allowance and the 200-Year + Upper End Allowance use an allowance for 2115. In order to ensure consistency and avoid confusion with the PfSH work which is the most up to date available information for future climate change whether this should be extended to include 2125 i.e. to cover the design life of the development of a 100 years?

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

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

*Flood Emergency Management Plan*

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

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

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

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

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

event.

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

*Surface water drainage and SUDS*

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

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

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

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

*Maintenance of flood risk management measures*

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

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

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

Nature conservation

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

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

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

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

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

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

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

Nutrient Neutrality

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

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

*Sustainable Drainage Systems*

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

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

Open space

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

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

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

Health

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

Parking and access

In accordance with the **NPPF (December 2024)**:
*'All developments that will generate significant amounts of movement should be required to provide a travel plan, and the application should be supported by a vision-led transport statement or transport assessment so that the likely impacts of the proposal can be assessed and monitored.'*

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

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

LTP4 seeks to deliver the following:

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

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

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

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

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

- The scale of the development would appear to require a Transport Assessment if a full Application is submitted - the scope of which should be discussed / agreed with HCC's Highways Development Planning team.

- The quantum of parking (for cars, bicycles and motorcycles) should be justified in relation to the Standards as set out in the Parking SPD, the scale of the development and any measures to reduce the reliance on the car – however, the present low level of accessibility to the site by public transport should be taken into account. A Travel Plan will be also required and the scope of such should again be discussed / agreed with HCC.

- The parking spaces should conform to the size requirements as set out in the Borough Councils Adopted Parking SPD, paying particular attention to the width of spaces (2.5m wide) / extended width end spaces (2.8m wide).

- Access to the site by any commercial vehicles likely to be visiting / delivering etc. should be detailed, including the size of vehicles likely to be serving the site, where they can park to load / unload, and any on-site turning provisions so they can enter / leave the site in a forward gear (including swept path analysis to demonstrate this).

<u>Skills and Training</u>

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

The Borough Council has produced its own practice guide outlining the process for securing training and employment in relation to major development which relate to local priorities. Key measures the Borough Council seek to include in discussions with developers are as follows:
• Work placement;
• Curriculum Support Activities;
• Career advice;
• Pre-employment training;
• Work trials and Interview guarantees;
• Apprenticeships;
• Vocational training;
• Supervisor training;
• Leadership and management training;
• Health and safety;
• Support with transport, childcare and work-equipment;
• Construction skills certificate scheme; and
• Financial contributions towards relevant training schemes within the area.

Pollution Control

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

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

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

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

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

Yours faithfully

[redacted]

**Development Manager** Dated: 17th November 2025

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

Hampshire County Council (HCC) – Flood Water Management (Local Lead Flood Authority)
We are happy to provide pre-application advice however please be aware that this is a chargeable service and can be requested from our website: https://www.hants.gov.uk/landplanningandenvironment/environment/flooding/planning

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

HCC – Highways

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

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

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

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

HCC – Ecology

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

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

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

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

HCC – Rights of Way

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

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

HCC – Archaeology

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

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

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

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

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

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

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

Natural England

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

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

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

Historic England

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

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

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

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

Southern Water

*Adequate Capacity*

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

*Development Site is not within Southern Water's Supply Area*

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

*Connection to public sewer*

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

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

*Proposed SUDS features*

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

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

The supporting documents make reference to drainage using Sustainable Drainage

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

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

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

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

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

Thus, where a SuDS scheme is to be implemented, the drainage details submitted to the Local Planning Authority should:
- Specify the responsibilities of each party for the implementation of the SuDS scheme.
- Specify a timetable for implementation.
- Provide a management and maintenance plan for the lifetime of the development.

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

Environmental Health – Land Contamination

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

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

Information to applicant

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

Environmental Health – Pollution

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

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

Coastal Partners

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

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

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

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

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

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

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

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

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

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

# Appendix D: Selecting Sites for Additional IRC Accommodation

1. The urgent need for additional IRC accommodation requires the Home Office to identify appropriate sites to help meet this need. In the appeal decision for the Bicester IRC (ref: APP/C3105/V/02/1097456 – referred to as 'the Bicester Decision') the Secretary of State agreed with the Inspector that *'it is not necessary for the Home Office to carry out an exercise comparing the site against alternative locations.*'

2. Although there is no policy requirement to consider alternative locations, the Home Office considered whether there are other suitable alternatives for an IRC expansion that are available and deliverable and that may be a more suitable site.

3. The method adopted by the Home Office for the site selection process reflected practical requirements in meeting the accommodation need, which is urgent.

4. The task of site searching is difficult and time-consuming due to the contentious nature of the proposed development. Accordingly, the methodology to site searching was focussed to avoid an unreasonable delay and cost to the process.

5. Accordingly, the Home Office assessed its existing portfolio, followed by a review of other sites in public ownership that were immediately available to meet the timeframe required for the proposed development. The staged approach is summarised in table E1 below.

6. Re-opening and/or expanding existing IRCs was prioritised, as this was considered the quickest way to provide additional capacity in a location that already benefits from the necessary security infrastructure.

7. The Home Office outline specific criteria which need to be met to facilitate the proposed development, as significant consideration must be given to the specific demands of an Immigration Removal Centre. Criteria are prioritised and failure to meet those of high priority means that the site fails to proceed to further examination.

Table E1 – Site Assessment Methodology

| | |
|---|---|
| Stage 1 | a. Home Office Ownership (IRC Portfolio – i.e. expansion)<br>b. Home Office Ownership (new IRC)<br>c. Other immediately available public land |
| Stage 2 | Catchment Area – London Airports with emphasis on Heathrow |
| Stage 3 | Land available for minimum 200 beds |
| Stage 4 | Value for money |
| Stage 5 | Result – Most suitable and deliverable site |

### Stage 1 – Home Office Ownership

8. Stage 1 of the assessment is to determine whether the site falls within Home Office Ownership, either freehold or leasehold interest in the site, or whether the site was in public ownership and

immediately available for the Home Office to acquire. The justification for these parameters is that significant investment is required for IRC expansion, and therefore Home Office would not enter this long-term investment if the future of the site were not secure, either in free-hold or long-term lease ownership. New IRC development needs be future proofed for the longevity and viability of the proposal for new bed spaces.

Table E2 – Site Analysis

| Site | Ownership | Conclusions |
|---|---|---|
| Dungavel | Home Office | Insufficient capacity for minimum additional bed spaces. |
| Tinsley House | Home Office Lease | Insufficient capacity for minimum additional bed spaces. |
| Brook House | Home Office Lease | No spare capacity |
| Yarl's Wood | Home Office Long Leasehold | Insufficient capacity for minimum additional bed spaces. |
| Derwentside | Home Office | Insufficient capacity for minimum additional bed spaces. |
| Colnbrook | Home Office | No spare capacity |
| Harmondsworth | Home Office | No spare capacity |
| Morton Hall | MOTO with MOJ | Insufficient capacity for minimum additional bed spaces. |
| Manchester Airport | Home Office Lease | No spare capacity |
| Larne | Home Office Lease | Insufficient capacity for minimum additional bed spaces. |
| HMP Camp Hill | Ministry of Justice | Decommissioned Prison. Strategic land use allocation for housing. Discounted as a result of logistical constraints and conflicting objectives. |
| Campsfield IRC | Home Office | Identified as a viable option as the site previously operated as an IRC and included sufficient adjacent land to support expansion. Its existing infrastructure, configuration and location met the operational, spatial and strategic criteria applied during the site-selection assessment. |
| Haslar IRC | Home Office | Identified as a viable option as the site previously operated as an IRC and included sufficient adjacent land to support expansion. Its existing infrastructure, configuration and location met the |

| | | |
|---|---|---|
| | | operational, spatial and strategic criteria applied during the site-selection assessment. |
| Linton on Ouse | Ministry of Defence | Discounted due to location, poor road access, and airport/seaport access. Deliverability concerns. |
| Driffield | Ministry of Defence | Not available in time required and remains an operational MoD site. |
| Sculthorpe | Ministry of Defence | Discounted due to location, costs, and lack of utility infrastructure. |
| Wethersfield | Home Office / Ministry of Justice | Not available in the time required and providing open asylum accommodation. |
| Cast Horsham | Home Office | Discounted due to size, cost, and capacity |
| Sandridge | Ministry of Justice | Discounted due to location, size, cost, utilities, and capacity. |

### Stage 2 Catchment Area

9. The location of new bed spaces, in close proximity to the airports used for immigration removal, is the second essential factor in site selection. Immigration removal takes place mainly from the London airports, with 90% from Heathrow. The location of bed spaces in the Southeast of England, in close proximity to the main airports, is beneficial for keeping travel to a minimum, to reduce stress for those being removed and minimise costs.

10. For the reasons listed above, it is important to prioritise new IRC bed spaces in the south of England, with locations closer to Heathrow being preferred.

### Stage 3 – Space for minimum of 200 bed spaces

11. The Home Office needs to achieve the maximum number of bed spaces possible to meet the current shortfall. A higher amount of bed spaces on the Haslar site will also make the development more cost effective. As part of the expansion, additional ancillary facilities will need to be provided to support detained individuals and staff, in turn increasing the overall amount of floorspace. The number of bed spaces that would be financially viable to support a single proposal is in the order of 200.

12. The amount of additional developable land required for this amount of IRC expansion results in all the other existing IRC sites failing these criteria and not moving forward to Stage 4.

### Stage 4 – Value for Money

13. The demand for bed spaces is caused by the need to accommodate increasing numbers of male residents. The opportunities to use existing facilities and staff is a benefit both operationally and financially and can secure improvements to the existing facilities, which will benefit residents and staff.

14. Providing separate accommodation would necessitate constructing an entirely new centre, replicating all facilities, even those already available on an existing site The cost implications of a new IRC at a site are such that it is not advisable to proceed on this basis. The Home Office has a limited budget to achieve as many bed spaces as possible.

15. A new IRC to accommodate the same number of spaces would cost significantly more than an extension to an existing facility. The Home Office have a duty to make best use of their budget and utilise the public purse to its maximum potential. Expanding the existing site into Home Office owned land is a much more viable option as the facilities would already be present.

16. Haslar IRC has a long history of use for detention purposes, initially as a Youth Offenders' Centre in the 1950's and finally as an Immigration Removal Centre (IRC) operating until 2016. This remains its lawful use. In Autumn 2026, Haslar IRC will once again be functioning.

17. Since the closure of Haslar IRC in 2016, demand for enforced returns has increased substantially, driven by shifting Government priorities and a significant rise in the number of individuals eligible for removal. This has created a clear requirement for additional detention capacity.

18. The refurbished Haslar IRC is soon to be operational, benefitting from existing infrastructure due to its previous use as an IRC.

19. Haslar is located within reasonable proximity to major transport hubs facilitating efficient logistics for enforced returns.

20. The location has a sufficient labour market to support the operations of a 600 bed IRC.

21. It is well located for the Home Office immigration control activity, being accessible both to areas where those with no right to be here are encountered and to airports for their removal from the country.

### Stage 5 – All Criteria Met

22 Haslar IRC is one of two remaining sites that meet all the above criteria. They provide the most suitable location and were chosen by the Home Office on this basis. The site is required to meet the immediate identified need.




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