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Planning Inspectorate
c/o QUADIENT
69 Buckingham Avenue
Slough, SL1 4PM

5th May 2026

Dear Sir/Madam,

The Gosport Borough Council Conservative Group objects to Crown Development Application CROWN/2026/0000005 because the applicant has failed to demonstrate that the proposed expansion of Haslar Immigration Removal Centre can be delivered without unacceptable planning harm.

Our objection is founded upon material planning considerations including:

1. Harm to the historic environment and Conservation Area.
2. Conflict with the strategic regeneration of the Haslar Peninsula.
3. Permanent sterilisation of an important housing site.
4. Inadequate assessment of cumulative transport impacts.
5. Unresolved impacts on health infrastructure and emergency services.
6. Incomplete ecological evidence.
7. Flood risk and emergency evacuation concerns.
8. Operational impacts arising from a continuously operating secure facility.
9. Lack of transparency and inadequate public engagement.

Whilst the Conservative Group has consistently opposed further expansion of Haslar Immigration Removal Centre, our objection is based on the failure of the application to demonstrate that development of this scale can be accommodated without unacceptable harm. Individually, these matters raise significant concern. Collectively, they demonstrate that planning permission should be refused. We are also asking if the Government continues to pursue the application through the Crown Development route, the Conservative Group asks that it be examined at a full public inquiry.

The Group's objection is firmly grounded in the adopted and emerging development plan and in the National Planning Policy Framework. The proposal conflicts with Policy LP3 of the adopted Gosport Borough Local Plan and Policy D2, together with Policies RA3 to RA7, of the emerging Gosport Borough Local Plan 2042. These policies establish a coordinated, heritage-led strategy for the regeneration of the Haslar Peninsula, including the delivery of new homes, employment, tourism and leisure opportunities. The introduction of a substantially expanded secure institutional facility would undermine that strategic vision and prejudice the successful regeneration of neighbouring sites.

In heritage terms, the proposal conflicts with Policies DE4 to DE6 of the emerging Local Plan and the relevant provisions of the National Planning Policy Framework concerning the conservation of heritage assets and the contribution made by their setting. The applicant has not demonstrated that four three-storey accommodation blocks of this scale and institutional appearance would preserve or enhance the setting and significance of the Haslar Barracks Conservation Area.

Harm to the historic environment and Conservation Area.

The proposed development would introduce four accommodation blocks of up to three storeys (approximately 12 metres high) immediately adjacent to the Haslar Barracks Conservation Area. Their scale, massing and institutional appearance would be out of keeping with the predominantly two-storey historic military buildings and surrounding residential character of the peninsula.

The visual impact would be further increased by raising finished floor levels by up to 1.27 metres to address flood risk, making the buildings appear even more prominent.

Although limited amendments have been made, they do not overcome the fundamental concern that the proposal represents overdevelopment. Increasing the separation from the Conservation Area does not mitigate the incompatible height, scale and massing of the buildings.

The application therefore fails to demonstrate that the development would preserve or enhance the significance, setting and character of the Haslar Barracks Conservation Area and wider historic environment.

Conflict with the strategic regeneration of the Haslar Peninsula.

The proposed development should be considered within the wider context of the long-term regeneration of the Haslar Peninsula. The emerging Gosport Borough Local Plan identifies the peninsula as one of the Borough's most significant regeneration opportunities, with a vision for a high-quality waterfront destination combining new homes, employment, heritage, tourism and leisure. This ambition is reinforced by the Council's Corporate Strategy, which seeks to improve quality of place, attract investment and strengthen the local economy.

This strategic regeneration is particularly important given Gosport's socio-economic challenges. Parts of the Borough rank amongst the 20% most deprived neighbourhoods in England, making the successful regeneration of the peninsula central to improving economic opportunity, housing delivery and the visitor economy.

The Royal Hospital Haslar redevelopment, Haslar Gunboat Sheds, the Piggeries, the former QinetiQ site, Fort Blockhouse and wider waterfront improvements should be viewed as a coordinated programme of regeneration rather than individual developments. Together they have the potential to transform the peninsula into a connected, mixed-use waterfront community.

Against this strategic context, the proposed expansion of the Immigration Removal Centre would introduce a substantially larger secure institutional use that is

fundamentally different from the mixed residential, heritage-led and visitor-focused environment the Local Plan seeks to create. Although the site lies outside the formal regeneration allocation, it occupies a prominent position within the peninsula and would inevitably influence perceptions of the wider area, investment confidence and the attractiveness of neighbouring regeneration projects.

The application has not demonstrated that the proposal would be compatible with the strategic regeneration objectives for the Haslar Peninsula or avoid undermining the long-term viability and attractiveness of Royal Hospital Haslar, Fort Blockhouse and the wider waterfront and town's prosperity. The proposal therefore conflicts with Policy D2 of the emerging Local Plan and the broader strategic vision for the peninsula's future.

Permanent sterilisation of an important housing site.

The application would permanently prevent the delivery of a significant housing site in a Borough with a severely constrained land supply. During preparation of the Local Plan, the Ministry of Justice promoted the site for residential development, and it was identified in the Regulation 18 draft Plan as capable of delivering approximately 225 homes.

Previous work demonstrated that a heritage-led scheme could have provided around 40% affordable housing alongside a substantial Community Infrastructure Levy contribution. Although the site was withdrawn from the Local Plan in 2022, this did not diminish its potential as a major housing opportunity.

Gosport cannot currently demonstrate a five-year housing land supply and has very few sites capable of delivering significant numbers of new homes, particularly affordable housing. The Government has not demonstrated why this constrained coastal site should instead accommodate a 600-place Immigration Removal Centre at the permanent expense of much-needed housing.

Inadequate assessment of cumulative transport impacts.

The application does not demonstrate that the local road network can accommodate the development alongside the significant growth already planned across the Haslar Peninsula.

Access is constrained, with most traffic using Fort Road and the surrounding Gosport highway network. The proposed Immigration Removal Centre could generate around 774 daily vehicle movements, in addition to traffic from Royal Hospital Haslar, Fort Blockhouse and other approved developments.

The Transport Assessment does not adequately explain how these cumulative impacts have been assessed or demonstrate that the network can operate safely without unacceptable congestion. It also relies on a future bus service for which no operator, funding or timetable has been secured. Until these improvements are guaranteed, the application should be assessed against existing public transport provision.

Significant sections of the Transport Assessment and Travel Plan remain redacted, preventing proper scrutiny of assumptions relating to traffic, parking, servicing and emergency access. A development of this scale should not be determined on the basis of incomplete and insufficiently transparent evidence.

Unresolved impacts on health infrastructure and emergency services.

The application repeatedly refers to a Health Needs Assessment, yet this has not been published. Without it, the Council, residents and local NHS organisations cannot properly assess the impact of a facility accommodating up to 600 people.

The application acknowledges that detainees would require routine outpatient and emergency hospital treatment through the same NHS services used by Gosport residents. However, the Planning Statement is inconsistent: it suggests local hospital use would be exceptional, while the unpublished Health Needs Assessment indicates that 4.1% of detainees are expected to require hospital treatment. This demonstrates that demand on local services is foreseeable.

The potential impact on ambulance provision is also significant, given Gosport's lack of an ambulance station and the site's restricted access. The Health Needs Assessment should therefore be published and the effects on local NHS and emergency services fully assessed before the application is determined.

Incomplete ecological evidence.

The application site is located in an environmentally sensitive area close to several nationally and internationally protected habitats. It lies adjacent to the Solent and Dorset Coast Special Protection Area and is close to Portsmouth Harbour Special Protection Area and Ramsar site, the Solent Maritime Special Area of Conservation and locally designated nature conservation sites. The area is also used by overwintering birds.

The Council's Ecologist has identified significant deficiencies in the ecological evidence submitted by the applicant. Some surveys date from 2023 and have not been updated. The proposed reptile mitigation does not identify sufficient retained habitat or explain clearly where the existing population would be relocated. Appropriate bat activity surveys have not been undertaken despite the loss of grassland, the introduction of new lighting and the site being assessed as having moderate suitability for foraging and commuting bats.

There is also insufficient evidence to support the conclusion that the site has negligible potential for notable invertebrates.

The applicant has therefore failed to provide the current and comprehensive evidence needed to understand the effects on protected species and demonstrate that effective mitigation can be delivered.

Flood risk and emergency evacuation concerns.

A significant proportion of the site lies within Flood Zones 2 and 3 and is expected to face increasing flood risk over the lifetime of the development. As a more vulnerable use, the proposal must satisfy the relevant planning tests.

Raising floor levels by up to 1.27 metres would increase the apparent height and prominence of the buildings, adding to their visual impact.

The site could accommodate up to 600 detainees who would require a controlled evacuation during a flood or other emergency. The Home Office has not demonstrated that detainees, staff and visitors could be evacuated safely, particularly given the site's restricted access.

The Inspector must be satisfied that the development would remain safe throughout its lifetime, would not increase flood risk elsewhere, and that the Flood Evacuation Management Plan is robust and deliverable.

Operational impacts arising from a continuously operating secure facility.

The proposed Immigration Removal Centre would operate as a secure 24-hour facility, generating continuous activity including staff shift changes, servicing, security operations, detainee movements and emergency responses.

Whilst the application confirms that detainees may arrive, be transferred or released at any time, it provides only limited assessment of the effects of these activities. The cumulative impacts of traffic, security lighting, operational noise and servicing on existing and future residents, including those at Royal Hospital Haslar, have not been adequately assessed.

The application also creates uncertainty through references to Category C prison design standards, raising questions about the site's long-term operational use. If permission were granted, it should be restricted to use as an Immigration Removal Centre only.

Overall, the applicant has failed to demonstrate that the continuous operation of a 600-place secure facility would be compatible with the character of the Haslar Peninsula or that its operational impacts have been satisfactorily assessed.

Lack of transparency and inadequate public engagement.

The application before the Inspector differs materially from the proposals originally presented to residents. Most significantly, the introduction of four three-storey accommodation blocks substantially increases the scale, massing and visual impact of the development, yet these buildings were not included during the initial public engagement.

The proposal is also more intensive than residents were led to expect, accommodating up to 600 detainees together with extensive operational and healthcare facilities. Delayed publication of information and extensive redactions to key technical

documents, including transport and operational assessments, have prevented proper public scrutiny.

Whilst the Crown Development process is lawful, it places an even greater responsibility on the applicant to ensure transparency and meaningful public engagement. Given the scale of the proposal and the extent of the redacted evidence, the application should be examined through a full public inquiry rather than determined by written representations alone.

Local Resident Impact

Whilst the Conservative Group recognises that these matters are not, in themselves, material planning considerations, they provide important context to the strength of local feeling and reinforce the need for the Inspector to ensure that every material planning issue has been fully examined before any decision is reached.

Throughout this application, residents have consistently expressed concerns regarding the effect of the proposal upon their quality of life, sense of security, mental wellbeing and confidence in the future of their neighbourhood.

Residents have also highlighted the disruption experienced during the construction of Phase One, including noise, traffic, dust and construction impacts, and fear that these problems will be repeated over a significantly longer construction programme.

Many residents have expressed concern regarding the potential effect on confidence in the local housing market and investment in their homes.

Conclusion

The proposed development represents a significant intensification of a secure institutional use at the heart of one of Gosport's most strategically important regeneration areas. The applicant has failed to demonstrate that the proposal is compatible with the long-term vision for the Haslar Peninsula or that its cumulative impacts on heritage, regeneration, housing, transport, ecology, flood risk, public services and residential amenity can be satisfactorily mitigated.

Taken together, these failings fundamentally undermine the planning case for the development. The proposal conflicts with the strategic objectives of the emerging Local Plan and risks prejudicing the successful transformation of the Haslar Peninsula into a connected, heritage-led waterfront community. It also fails to provide residents with confidence that the long-term character, quality of place and amenity of their neighbourhood have been properly protected.

For these reasons, the Conservative Group respectfully requests that Crown Development Application CROWN/2026/0000005 be refused.

Should the Inspector be minded not to refuse the application, we request that it be determined only following a full public inquiry. Written representations alone would not provide sufficient scrutiny for a proposal of this scale, complexity and public interest. A public inquiry would allow the applicant's evidence to be tested openly, enable

residents, elected members and technical consultees to participate fully, and provide the transparency that has been lacking throughout the development of this proposal.

Your Sincerely,



Councillor Zoe Huggins BEM
Conservative Group Leader

**Councillor
Beech MBE**
Anglesey

**Councillor
Burgess**
Lee East

**Councillor
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Alverstoke

**Councillor
Hayes**
Lee West

**Councillor
Jessop**
Grange and
Alver Valley

**Councillor
Meenaghan**
Harbourside
and Town

**Councillor
Namedo**
Peel Common

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