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Our ref: 553646
Your ref: CROWN/2026/0000005



Customer Services
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Dear Crown Development Case Team,

Planning consultation: Outline Planning Application with all matters reserved (except for access) for the expansion of Haslar IRC

Location: Haslar Immigration Removal Centre (IRC), Dolphin Way, Haslar, Gosport, PO12 2AW

Thank you for your consultation on the above dated 14th July 2026. We apologise that we were not able to provide detailed comments prior to the closure of the deadline. Key documents relevant to our response are redacted. We sought to gain access to the relevant documentation directly and received access to this on Wednesday the 5th of August, which did not allow us enough time to publish our response.

Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.

SUMMARY OF NATURAL ENGLAND'S ADVICE

FURTHER INFORMATION REQUIRED

As submitted, the application could have potential significant effects on the Portsmouth Harbour Special Protection Area (SPA) and Ramsar.

Natural England have reviewed the unredacted Habitats Regulations Assessment (HRA) (1st Horizon, May 2026). While we are broadly in agreement with the principles behind the conclusions, they are not supported by the appended information.

The attached Habitat Management and Monitoring Plan is for 'BNG Habitat Bank at Land off Burnt House Lane, Stubbington, Fareham, Hampshire PO14 2EF'. We believe this document has been included in error. It is the incorrect document to support the conclusions of the HRA. We provide detailed comments below on the reason for this, and suggestions for a positive resolution.

Please note also our comments on the impact to national trails below. Please re-consult Natural England once this information has been obtained.

Natural England's standing advice on other issues is included in Annex A.

Habitats Regulations Assessment

The proposal will result in the permanent direct loss of ~1.4 hectares of land currently functionally linked to the Portsmouth Harbour Special Protection Area (SPA).

These functionally linked sites form part of a network of terrestrial sites (mapped as part of the [Solent Wader and Brent Goose Strategy](#)) located outside of the Solent SPAs boundaries used by SPA species (including qualifying features and assemblage species) as alternative areas for roosting and foraging. These sites support the functionality of the designated sites and are therefore [protected in this context](#). The site affected is G63, a core area of habitat for Brent Geese. In principle, we would agree that the loss of G63 could be mitigated by the creation or enhancement of habitat elsewhere within the functional network. More information on this process can be found in the Solent Wader and Brent Goose [Guidance on Mitigation and Off-setting Requirements](#) (2024).

The HRA (provided to Natural England directly on the 5th August 2026) correctly identifies this impact pathway, and is supported by Appendix C, the Habitat Management and Monitoring Plan (HMMP) for the BNG Habitat Bank at Land off Burnt House Lane, Stubbington. The document lists Arbtech as the author.

We firstly note that the HMMP includes Natural England and DEFRA logos. **This document has not been authored or endorsed by Natural England or DEFRA** and this logo must be removed.

Appendix C does not satisfy the intended purpose/conclusions in the HRA:

- The period covered by this management plan is 30 years. The 30 year management period is referenced frequently throughout the document. The mitigation for the impacts to land functionally linked to Portsmouth Harbour SPA should be secured for the lifetime of the proposed development.
- The monitoring responsibility falls to the 'LPA or responsible body'. This is likely intended to cover the biodiversity net gain elements of the plan. For a HRA the monitoring responsibility should be explicit to a named authority.
- In the Habitats and Condition Targets section (page 33) there is no reference whatsoever to field parcel 1, which is the element of the scheme specific to mitigating the impacts on functionally linked land.
- It should be noted that the proposed mitigation strategy is currently designated as functionally linked land itself. It is designated code 'F17O' in the Solent Wader and Brent Goose Strategy. The overview of baseline site use (page 10) neglects to consider this site allocation. It is also neglected in the 'Statutory / Non-statutory Designated Sites' section of the 'impacts checklist' (page 13). Although, this is mentioned in the 'Constraints and Opportunities for Project' section on page 16.

Paragraph 2.3.1 lists other information papers which support the HRA. Of particular note are the:

- Stubbington Habitat Management and Monitoring Plan (HMMP) (1st Horizon, 2024a) and referenced technical documents including: The status of UK SPAs in the 2000s (Stroud et al, on behalf of the UK SPA & Ramsar Scientific Working Group, 2016).
- Wild Capital Stubbington Brent Goose Mitigation Plan (Wild Capital, 2025)
- Wild Capital Conservation Covenant Agreement, Solent Waders, and Brent Goose Strategy Mitigation Site (Wild Capital, 2025a)

We suspect that the incorrect document was appended to the HRA. The BNG focused HMMP does not address the points needed for the HRA, but the above three documents may do so.

National Trails

The proposed works will impact upon the alignment of the King Charles England Coast Path (KCIIIECP) and will require the route to be temporarily aligned during the works, and permanently

re-routed, through a route variation once the works are complete. It is important that the King Charles III England Coast Path Project Manager at Hampshire County Council (HCC) is consulted and involved with any route alignment discussions.

Please ensure that Alison Perry as a representative of the HCC Countryside Service, Access Team has been consulted.

Natural England advise the proposal includes the commitment to keeping the King Charles III England Coast Path (KCIIIIECP) open and available during the construction period, where possible, using management measures, such as controlled crossings, traffic marshals, and signage.

The KCIIIIECP has a positive socio-economic impact by connecting the public with nature, and a positive impact on the local tourist economy. If temporary closures are required, then the number and duration should be kept to a minimum, and effective mitigation is needed for the impacts on recreational users of the Public Rights of Way network, especially during the construction period. Short, temporary alternative diversions should be provided if the route of the KCIIIIECP is closed for any period.

If you have any queries relating to the advice in this letter, please contact

[REDACTED]

Yours faithfully,

[REDACTED]

Senior Officer
Major Infrastructure
Thames Solent

Annex A: Natural England's Standing Advice

Protected Landscapes

Paragraph 189 of the [National Planning Policy Framework - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/policies/national-planning-policy-framework) (NPPF) requires great weight to be given to conserving and enhancing landscape and scenic beauty within Areas of Outstanding Natural Beauty (known as National Landscapes), National Parks, and the Broads and states that the scale and extent of development within all these areas should be limited. Paragraph 190 requires exceptional circumstances to be demonstrated to justify major development within a designated landscape and sets out criteria which should be applied in considering relevant development proposals. Section 245 of the [Levelling-up and Regeneration Act 2023 \(legislation.gov.uk\)](https://www.legislation.gov.uk/ukpga/2023/1/section/245) places a duty on relevant authorities (including local planning authorities) to seek to further the statutory purposes of a National Park, the Broads or an Area of Outstanding Natural Beauty in England in exercising their functions. This duty also applies to proposals outside the designated area but impacting on its natural beauty.

The local planning authority should carefully consider any impacts on the statutory purposes of protected landscapes and their settings in line with the NPPF, relevant development plan policies and the Section 245 duty. The relevant National Landscape Partnership or Conservation Board may be able to offer advice on the impacts of the proposal on the natural beauty of the area and the aims and objectives of the statutory management plan, as well as environmental enhancement opportunities. Where available, a local Landscape Character Assessment can also be a helpful guide to the landscape's sensitivity to development and its capacity to accommodate proposed development.

Wider landscapes

Paragraph 187 of the NPPF highlights the need to protect and enhance valued landscapes through the planning system. This application may present opportunities to protect and enhance locally valued landscapes, including any local landscape designations. You may want to consider whether any local landscape features or characteristics (such as ponds, woodland, or dry-stone walls) could be incorporated into the development to respond to and enhance local landscape character and distinctiveness, in line with any local landscape character assessments. Where the impacts of development are likely to be significant, a Landscape and Visual Impact Assessment should be provided with the proposal to inform decision making. We refer you to the [Guidelines for Landscape and Visual Impact Assessment \(GLVIA3\) - Landscape Institute](https://www.gov.uk/government/publications/guidelines-for-landscape-and-visual-impact-assessment) for further guidance.

Biodiversity duty

Section 40 of the [Natural Environment and Rural Communities Act 2006 \(legislation.gov.uk\)](https://www.legislation.gov.uk/ukpga/2006/14/section/40) places a duty on the local planning authority to conserve and enhance biodiversity as part of its decision making. We refer you to the [Complying with the biodiversity duty - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/publications/complying-with-the-biodiversity-duty) for further information.

Designated nature conservation sites

Paragraphs 193-195 of the NPPF set out the principles for determining applications impacting on Sites of Special Scientific Interest (SSSI) and habitats sites (Special Areas of Conservation (SACs) and Special Protection Areas (SPAs)). Both the direct and indirect impacts of the development should be considered.

A Habitats Regulations Assessment is needed where a proposal might affect a habitat site (see [Habitats regulations assessments: protecting a European site - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/publications/habitats-regulations-assessments-protecting-a-european-site) and Natural England must be consulted on 'appropriate assessments' (see [Appropriate assessment - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/publications/appropriate-assessment) for more information for planning authorities).

Natural England must also be consulted where development is in or likely to affect a SSSI and provides advice on potential impacts on SSSIs either via the [SSSI Impact Risk Zones \(England\) \(arcgis.com\)](https://arcgis.com) or as standard or bespoke consultation responses. Section 28G of the Wildlife and Countryside Act 1981 places a duty on all public bodies to take reasonable steps, consistent with the proper exercise of their functions, to further the conservation and enhancement of the features for which an SSSI has been notified ([Sites of special scientific interest: public body responsibilities - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/publications/sites-of-special-scientific-interest-public-body-responsibilities)).

Air Quality

Natural England has produced [‘Air pollution and development: advice for local authorities. How to assess sector-specific planning applications that could affect air quality on a protected site’](#). This standing advice is to help planning authorities understand the impact on statutory protected sites from particular developments that emit specific air pollutants. The advice covers emissions of ammonia (NH₃), nitrogen oxides (NO, NO₂ or NO_x), nitrogen deposition, acid deposition and sulphur dioxide (SO₂). The standing advice is Natural England’s formal statutory advice and is a material consideration. It provides decision makers with the information needed to fulfil their statutory duties when making decisions on planning applications with potential air pollution impacts. Note that this advice cannot be used to assess Nationally Significant Infrastructure Projects (NSIPs) or local plans.

Protected Species

Natural England has produced [Protected species and development: advice for local planning authorities - GOV.UK](#) (standing advice) to help planning authorities understand the impact of particular developments on protected species.

Natural England will only provide bespoke advice on protected species where they form part of a Site of Special Scientific Interest or in exceptional circumstances. A protected species licence may be required in certain cases. We refer you to [Wildlife licences: when you need to apply](#) (www.gov.uk) for more information.

Local sites and priority habitats and species

The local planning authority should consider the impacts of the proposed development on any local wildlife or geodiversity site, in line with paragraphs 187, 188 and 192 of the NPPF and any relevant development plan policy. There may also be opportunities to enhance local sites and improve their connectivity to help nature’s recovery. Natural England does not hold locally specific information on local sites and recommends further information is obtained from appropriate bodies such as the local environmental records centre, wildlife trust, geoconservation groups or recording societies. Emerging [Local nature recovery strategies - GOV.UK \(www.gov.uk\)](#) may also provide further useful information.

Those habitats and species which are of particular importance for nature conservation are included as ‘priority habitats and species’ in the England Biodiversity List published under section 41 of the Natural Environment and Rural Communities Act 2006. Most priority habitats will be mapped either as Sites of Special Scientific Interest on the Magic website or as Local Wildlife Sites. We refer you to [Habitats and species of principal importance in England](#) (gov.uk) for a list of priority habitats and species in England. You should consider priority habitats and species when applying your ‘biodiversity duty’ to your policy or decision making

Natural England does not routinely hold priority species data. Such data should be collected when impacts on priority habitats or species are considered likely.

Consideration should also be given to the potential environmental value of brownfield sites, often found in urban areas and former industrial land. We refer you to the [Brownfield Hub - Buglife](#) for more information and Natural England’s [Open Mosaic Habitat \(Draft\) - data.gov.uk](#) (Open Mosaic Habitat inventory), which can be used as the starting point for detailed brownfield land assessments.

Biodiversity and wider environmental gains

Development should provide net gains for biodiversity in line with the NPPF paragraphs 187(d), 192 and 193. Unless exempt all new Town and Country Planning Act development are also required by law to deliver a biodiversity gain of at least 10%. This legal requirement will be extended to all new nationally significant infrastructure projects (NSIPs) development consent order (DCO) applications from 2nd November 2026.

[Biodiversity Net Gain](#) guidance (gov.uk) provides more information on biodiversity net gain and includes a link to the [Biodiversity Net Gain Planning Practice Guidance](#) (gov.uk) and the recently updated list of [BNG exemptions](#).

The statutory biodiversity metric must be used to calculate biodiversity losses and gains for terrestrial and intertidal habitats and can be used to inform any development project. We refer you to [Calculate biodiversity value with the statutory biodiversity metric](#) for more information. For minor development sites, [The Small Sites Metric](#) may be used where these sites meet the criteria to use this Small Sites Metric. This is a simplified version of the statutory biodiversity metric and is designed for use where certain criteria are met.

The mitigation hierarchy as set out in paragraph 193 of the NPPF should be followed to firstly consider what existing habitats within the site can be retained or enhanced. Where on-site measures are not possible, provision off-site will need to be considered.

Where off-site delivery of biodiversity gain is proposed on a special site designated for nature (e.g. a SSSI or habitats site) prior consent or assent may be required from Natural England. More information is available on [Sites of Special Scientific Interest: managing your land](#)

Development also provides opportunities to secure wider biodiversity enhancements and environmental gains, as outlined in the NPPF (paragraphs 8, 77, 109, 125, 187, 188, 192 and 193). Opportunities for enhancement might include incorporating features to support specific species within the design of new buildings such as swift or bat boxes or designing lighting to encourage wildlife.

[The Environmental Benefits from Nature Tool - Beta Test Version - JP038 \(naturalengland.org.uk\)](#) may be used to identify opportunities to enhance wider benefits from nature and to avoid and minimise any negative impacts. It is designed to work alongside the statutory biodiversity metric.

[Natural environment - GOV.UK \(www.gov.uk\)](#) provides further information on biodiversity net gain, the mitigation hierarchy and wider environmental net gain.

Ancient woodland, ancient and veteran trees

The local planning authority should consider any impacts on ancient woodland and ancient and veteran trees in line with paragraph 193 of the NPPF. The [Natural England Access to Evidence - Ancient woodlands Map](#) can help to identify ancient woodland. Natural England and the Forestry Commission have produced [Ancient woodland, ancient trees and veteran trees: advice for making planning decisions - GOV.UK \(www.gov.uk\)](#) (standing advice) for planning authorities. It should be considered when determining relevant planning applications. Natural England will only provide bespoke advice on ancient woodland, ancient and veteran trees where they form part of a Site of Special Scientific Interest or in exceptional circumstances.

Best and most versatile agricultural land and soils

Local planning authorities are responsible for ensuring that they have sufficient detailed agricultural land classification (ALC) information to apply NPPF policies (Paragraphs 187, 188). This is the case regardless of whether the proposed development is sufficiently large to consult Natural England. Further information is contained in the [Guide to assessing development proposals on agricultural land - GOV.UK \(www.gov.uk\)](#). [Find open data - data.gov.uk](#) on Agricultural Land Classification or use the information available on [MAGIC \(defra.gov.uk\)](#).

The Defra [Construction Code of Practice for the Sustainable Use of Soils on Construction Sites \(publishing.service.gov.uk\)](#) provides guidance on soil protection, and we recommend its use in the design and construction of development, including any planning conditions. For mineral working and landfilling, we refer you to [Reclaim minerals extraction and landfill sites to agriculture - GOV.UK \(www.gov.uk\)](#), which provides guidance on soil protection for site restoration and aftercare. The [Soils Guidance \(quarrying.org\)](#) provides detailed guidance on soil handling for mineral sites.

Should the development proceed, we advise that the developer uses an appropriately experienced soil specialist to advise on, and supervise soil handling, including identifying when soils are dry enough to be handled and how to make the best use of soils on site.

Green Infrastructure

For evidence-based advice and tools on how to design, deliver and manage green and blue

infrastructure (GI) we refer you to [Green Infrastructure Home \(naturalengland.org.uk\)](https://naturalengland.org.uk) (the Green Infrastructure Framework). GI should create and maintain green liveable places that enable people to experience and connect with nature, and that offer everyone, wherever they live, access to good quality parks, greenspaces, recreational, walking and cycling routes that are inclusive, safe, welcoming, well-managed and accessible for all. GI provision should enhance ecological networks, support ecosystems services and connect as a living network at local, regional and national scales.

Development should be designed to meet the 15 [GI How Principles \(naturalengland.org.uk\)](https://naturalengland.org.uk). The GI Standards can be used to inform the quality, quantity and type of GI to be provided. Major development should have a GI plan including a long-term delivery and management plan. Relevant aspects of local authority GI strategies should be delivered where appropriate.

The [Green Infrastructure Map \(naturalengland.org.uk\)](https://naturalengland.org.uk) and [GI Mapping Analysis \(naturalengland.org.uk\)](https://naturalengland.org.uk) are GI mapping resources that can be used to help assess deficiencies in greenspace provision and identify priority locations for new GI provision.

Access and Recreation:

Natural England encourages any proposal to incorporate measures to help improve people's access to the natural environment. Measures such as reinstating existing footpaths, together with the creation of new footpaths and bridleways should be considered. Links to urban fringe areas should also be explored to strengthen access networks, reduce fragmentation, and promote wider green infrastructure.

Rights of Way, Access land, Coastal access and National Trails:

Paragraphs 105, 185, 187 and 193 of the NPPF highlight the importance of public rights of way and access. Development should consider potential impacts on access land, common land, rights of way and coastal access routes in the vicinity of the development.

Consideration should also be given to the potential impacts on any nearby National Trails. We refer you to [Find your perfect trail, and discover the land of myths and legend - National Trails](#) for information including contact details for the National Trail Officer.

Further information is set out in the Planning Practice Guidance on the [Natural environment - GOV.UK \(www.gov.uk\)](https://www.gov.uk).