

Crown Development Application 0000005

I OBJECT wholeheartedly to the expansion of Haslar Immigration Removal Centre to increase capacity four-fold to 600 detainees. I do not think that you realise just how CLOSE our neighbouring homes are and how much this proposal will detrimentally affect our lives forever.

The material reasons for my objection are as follows:

1. Access

A new access point is proposed in Fort Road which was never historically an access point to the IRC site. When the Centre was previously up and running, this gate was used solely for the storage of trailers and boats and did not form part of the secure site at all. It was never used as access to the site and was never used for motorised vehicles. Therefore, this constitutes a complete change of use without the required infrastructure being put in place **and** without due consideration for neighbouring homes which are just 5 to 9 metres away from these gates. The nearest neighbour is just 5m from their boundary to the gate, with those living opposite being just 9 metres away (the width of the road). Use of this gate for site access would create enormous disruption and safety concerns for neighbouring homes.

No buffer or barrier has been stipulated to prevent light and noise pollution to these homes and no consideration of what nighttime mitigations will be in place to prevent disturbance through the night from this proposed new access point being in operation. Whilst it is recognized that this access point is labelled as 'emergency access' there is no information provided about what this actually entails and whether the well-being of those who live next to it will be impacted and to what extent. **We have a right to peace in our own homes especially so at night.**

A new footpath is planned between sea wall car park and boat storage yard, but no reason is provided for this. (*Turquoise dashed line in diagram 1*) This is likely to be a source of significant disturbance particularly at shift changeovers, which will happen very early in the morning from 6.30am and late in the evening 7 days a week 365 days a year.



Diagram 1 showing turquoise dashed line indicating a footpath between the sea wall car park and boat storage yard to Fort Road.

A new footpath THROUGH boat storage yard is also indicated, but without security, but for what reason? Is this for staff to come and go? Right next to homes and therefore increasing the likelihood of parking in Fort Road, right outside **OUR** homes? (*Diagram 1*)

The fencing around the boat storage yard is currently 2m high, NOT 5.2m high, there is no indication on the drawings whether this will be increased, which would be unacceptable to neighbouring homes, or whether it will remain at this height, which we assume is the case as this area should not form part of the secure area of the site due to proximity to homes and complete lack of a buffer zone.

The re-routed England coastal path access – King Charles III way – is proposed to be only 2m wide and very long with 2m high fencing on both sides, we do not feel that this is safe especially for lone walkers. Previously this has been a safe walking route and should remain so.

2. Noise pollution

Staff entering and leaving the site during shift changeovers will create a great deal of noise. 414 staff create a lot of noise by talking, slamming car doors, car engines, mobile phone conversations, car stereos, car alarms etc. Shift changeovers will take place between 7am to 8am and 7pm to 8pm (transport assessment document p.25), so staff are predicted to arrive on shift from 6.30am (or earlier) (transport assessment document). The level of noise created by this shift change over on a daily basis is NOT acceptable especially at this time in the early morning EVERY SINGLE DAY! The welfare of the local people who neighbour this site has not been considered at all.

What mitigations will be implemented to prevent early morning disturbance to neighbouring homes? Human auditory sensitivity naturally increases at this time of the early morning and night disturbances clash directly with sleep cycles. Nighttime noise disrupts critical deep-sleep. Over time this can lead to cognitive strain, emotional volatility, including anxiety and elevated cortisol which can drive up blood pressure over time. Therefore nighttime and early morning disruptions MUST be avoided in totality.

The CASU (solitary confinement unit for the most aggressive offenders) is within 60m of neighbouring homes. Clearly the CASU will be a significant source of noise disturbance at all times of the day and night, with detainees banging and thumping on walls and doors and shouting out, security gates, alarms and buzzers etc. What mitigations will be in place to prevent disturbance from this, especially given the close proximity to homes?

The dining hall seating 250 men plus staff is in extremely close proximity (20m) to neighbouring homes, this is likely to be in use all day from early in the morning until late at night. What mitigations will be in place to prevent disturbance from this?

Multiple air conditioning units HVAC and other plant will be on the roofs of the accommodation blocks. Significant noise will be created 80 to 90 dB per unit (as loud as a lawn mower at 3m away), as there will be multiple units running constantly and throughout the night and sounding like a constant drone. Multiple HVAC units will produce around 65dB from 60m away, so a significant noise disturbance at night.

W.H.O. recommends no more than 30dB at night for undisturbed sleep. Sleep will be impossible in our homes!

A large crowd of men just going about their business make approximately 100dB of noise! If they shout it will be much more than that. We expect that there will be a lot of shouting.

So, 600 men plus 414 staff = a LOT of noise!

The baseline noise survey was carried out in January 2024! Clearly noise levels generated by the IRC will be more significant in summer, when windows and doors will be open and more time is spent outside.

Now consider that all of the above noises are happening **at the same time**, consider the **cumulative effect** of 600 detainees talking and shouting, 414 staff talking and shouting, multiple HVAC units running, security gates and doors crashing and banging, vehicle noise, car stereos, car alarms, pedestrian traffic, emergency alarms etc. Now consider how draining that would be and how detrimental to mental health that will be to those of us who live just a few metres away and have to suffer this every single day and night, with no respite whatsoever. (See photo 1)

Our homes are post-war, Cornish construction with ZERO acoustic screening! The construction of upper storey (bedrooms) is tile, timber batten and plasterboard – that's it! We can't change that! So, what mitigations will be in place to protect our quality of life and ensure that we are able to sleep, live and work in our own homes?

There is NO PRECEDENT for an IRC of this scale being in such close proximity to a residential area.

Legal frameworks guarantee a right to peace in your own home, this is protected under human rights laws – how will WE be protected against the noise and disturbance from the inappropriate expansion of HIRC?



Photo 1 showing the proximity of homes (red circles) to the site and also to proposed access points (dark blue arrow and light blue dimension)

3. Light pollution

The whole site is likely to be floodlit, creating immense light pollution issues to those who live facing the site (lighting strategy document 01LFF32MLDHNLTXHQQ5HY44XT7RRJE7AU). There is currently minimal light pollution in this area, hence an active area for wildlife including bats and badger.

Many of us moved to this area precisely because of its quiet and peaceful nature, you are taking that away from us by imposing such a huge expansion of the Centre and in such close proximity to our homes.

This development will cause a significant increase in light pollution, especially in the vicinity of the proposed access points which will be flood lit at 6m high (lamp posts), homes are right next to the proposed access points and perimeter fence line with 0 metres between! So what mitigations will be implemented to ensure that neighbouring properties are not impacted by light pollution? There is nothing to suggest any mitigations in the redacted documentation.

A pathetically small vegetation area is NOT a barrier to light pollution, apart from the fact that vegetation takes many decades to grow and establish, it does not prevent light, noise or air pollution successfully and should not be used as an excuse for poor design, unnecessary close proximity, over development and lack of consideration.

4. Size and lack of precedent

There is no precedent for buildings of this scale and mass in this area at all, this is a huge over-development. This is a coastal community with low rise, two storey dwellings up to 9m in height, most are small residential homes of 8m in height. The existing Haslar barracks are single storey. There is no precedent for 12m high, bulky blocks of accommodation that are raised a further 1.27m above ground level giving the appearance of almost 14m in height.



Diagram 2 showing huge scale and lack of consideration for surrounding landscape

The *previous iteration* of the HIRC did not significantly impact upon neighbouring properties because it was one single story and located much further away from homes, with an access point that was well away from homes. This over-developed proposal is a different matter altogether.

The plans state that the accommodation blocks are 3 storeys high, in fact they are 13 to 14m from ground level (12m in height raised 1.27m above ground level), which is the equivalent of 4.5 storeys (*diagram 3*). In addition, the dining hall and CASU blocks are described as single storey, but they are in fact 9m in height (the same height as a two storey home including the pitched roof) and they both have an additional floor clearly shown in the elevations (*diagram 4*). If they are single storey then they should be exactly that, not 9m high with a first floor! **This is deliberately misleading.**

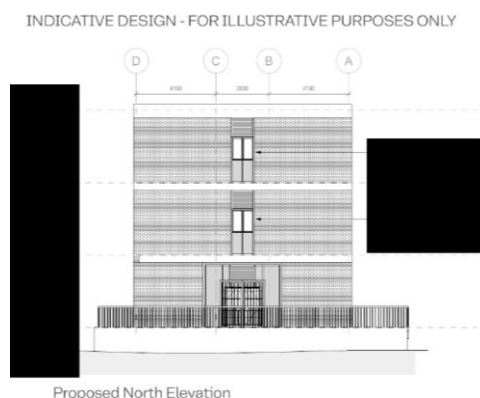


diagram 3 showing scale and raised platform



Diagram 4 clearly showing a second floor on a “single storey” building.

The accommodation blocks, dining hall and CASU will be ‘constructed’ of approximately 200 modular units, an absolute eyesore, not in keeping whatsoever with the surrounding area and not a design to be proud of, merely a way of cramming in as much accommodation as possible onto a restricted site as cheaply as possible, without care or consideration for the surrounding area and those who live there. (Diagram 5)

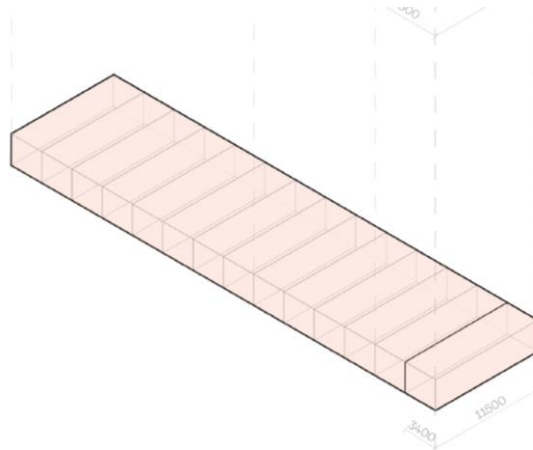


Diagram 5 showing modular units for one floor of one accommodation block

Each modular unit could be up to 16 m long and 3.5m wide, with a footprint of around 3,500 m² in phase 2 alone, all built on playing fields - **A GREENFIELD SITE!**

This site is a GREENFIELD site, it has never been built upon previously.

This proposal will spoil the coastal skyline, as viewed from historic Portsmouth, Portsmouth Harbour and The Solent as well as from the King Charles III England Coastal Path and residential areas. It is utterly overbearing on this residential area both in height and in mass.

The height of the proposed accommodation blocks present a real-terms fear of overlooking. What is to stop detainees staring straight into our bedroom windows? The orientation of the blocks does not prevent this, the line of sight is clear and where there is no direct line of sight, they can just hold a phone out of the window and record into our bedrooms. This is totally unacceptable and a breach of our right to privacy.

This proposal presents a complete loss of privacy to those living neighbouring the development, the ‘landscape impact assessment’ does not take into consideration the impact from the bedrooms of residential homes on Fort Road, it only considers the loss of privacy at ground level, not at first floor level. This must be addressed.

5. Parking, traffic and air pollution

The documents clearly state that 414 employees will be required on the site, yet only 259 car parking spaces are proposed in the sea wall carpark plus 35 to 43 spaces on Dolphin Way. Where will other 112 to 120 park? Realistically, this many people will NOT arrive by public transport as it does not exist at that time of day, neither will they walk or cycle as this is a peninsula, making this mode of transport extremely unlikely due to the distances and lack of infrastructure available. The vast majority, if not all, will arrive by car. Where will they park? If they park in local roads, this will create further noise, air pollution and disruption with 112 (or more) cars parking outside homes at 6.30am every single day!

Even with the sea wall carpark, human nature being what it is means that staff will aim to park as close as possible to their place of work which, in this case, is the surrounding **residential roads**. Therefore, creating a multitude of issues including noise, air pollution, blocking drives and junctions, car alarms going off, antisocial behaviour, local people being prevented from their own visitors and contractors being able to park etc. Or roads will once again be flooded with unwanted vehicles causing unending problems (we have suffered for a year from contractor parking – photo 2 and 3

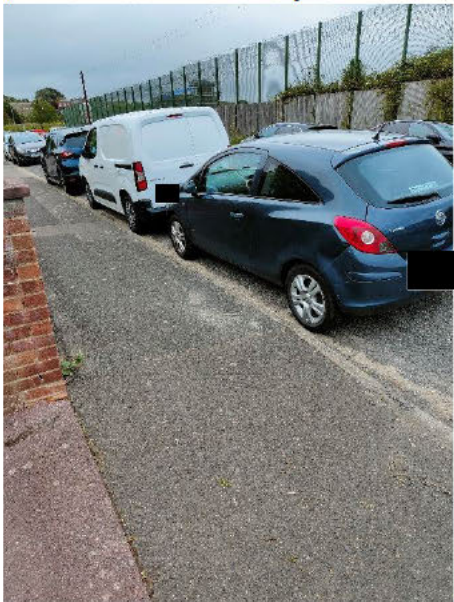


Photo 2 showing contractor parking both sides of road and over dropped kerbs obscuring visibility from drives.



Photo 3 showing early morning arrivals and disturbance at 6.54am, note four construction workers visible in this photo, all talking loudly across the road.

Adequate off-road parking MUST be provided and ENFORCED to completely cater for this level of staffing without impacting on the local roads.

6. Safety and security

There is a complete lack of security procedure for breeches, no consideration has been given to the wellbeing and welfare of local people. The documents claim that the site is 100% secure, but this is never the case and there are plenty of precedents for breeches from other IRCs into the local area and the impacts of those. However, in those precedents, the local area is either rural or industrial. There is no precedent for an IRC in a residential area. So, a thorough risk assessment and procedure must be implemented and communicated in detail to everyone living in the proximity including appropriate action to take when a breach occurs, prioritizing the safety and well-being of the local people and **our right to feel SAFE in our own neighbourhood and homes.**

Failure to do so is a failure to protect the people in the neighbourhood.

We have suffered from almost two years of antisocial behaviour from parking issues caused by contractor parking during the construction of phase 1, we are not willing to tolerate this during phase 2. So, staff parking **MUST** be PROPERLY MANAGED AND CONTROLLED so as not to impact upon those who live here.

7. Lack of communication

To date there has been utter refusal by the Home Office to communicate effectively with those who are most severely impacted by this development. Despite our repeated efforts, no effective means of two-way dialogue has been established. **Local people are treated with contempt and a conspiracy of silence.** Clearly this is unacceptable. We note that the planning documents state that effective two-way communication must be established, however we do not believe that this will happen, due to our past experience. This **MUST** be STIPULATED as a condition, monitored and ENFORCED.

To date there has been NO RESPONSE to enquiries made regarding THIS application following the contact information provided on the letter to neighbours and communication with the Planning Inspectorate, this is utterly unacceptable. **I personally have contacted the Planning Inspectorate, been given a contact to ask my questions to, and have been completely IGNORED by that contact. I have not had my questions addressed at all. This is not acceptable and MUST BE INVESTIGATED.**

The drawings and documents are so (unnecessarily) heavily redacted that it is impossible to make sense of them and they become meaningless, leaving us to assume the worst.

Honesty and transparency is required, it is understood that some information is of a sensitive nature, but certainly not to this extent. As the people who are the MOST HEAVILY IMPACTED, we deserve to be able to gain the information that we require.

8. Construction phase and Construction Environment Management Plan (CEMP)

A comprehensive CEMP **MUST** be in place for the whole construction phase to protect neighbours from noise pollution, air pollution, dust pollution, light pollution, vibrations from HGVs and site machinery and other operations, damage to property, disturbance, ASB from contractors etc....



Photo 4 taken July 2026 showing the extent of the energy centre development and how widespread the site works are for such a relatively small section of the development.



Photo 5 taken July 2026 showing the effect of the dust and utter lack of mitigations because of the absence of a CEMP. This dust will contain silica and cement particles, which causes permanent long term damage to lung health including COPD and other chronic health issues and allergies.

Two-way, reliable communication procedures **MUST** be in place and effective throughout the construction phase. Any concerns **MUST** be dealt with promptly and effectively. Issues must be pre-empted, not just relying on remediation after the issue has occurred (Outline Environmental Management plan 3.5 page 3 and 4).

Restricted working hours as stated in the planning application **must be mandated** 9am to 5pm Monday to Friday and absolutely no site work or deliveries must take place outside of these hours (Outline Environmental Management Plan 3.3 page 3).

Fort Road is a residential road, not a main road, so all site traffic must be managed with due care and consideration with priority given to those who live there and have been forced to tolerate this upheaval for 2 years already, and for several years yet to come. Access to the site for large vehicles **MUST** not impact upon neighbouring properties in any way and appropriate communication and mitigations **MUST** be in place from the start to the end. **Contractor parking MUST not be allowed in our residential area and outside of our homes.**

Appropriate **off-site** parking must be provided and ENFORCED for contractors, **NOT IN RESIDENTIAL ROADS.**

No consideration has been given to the implications of multiple developments already taking place in the area at the same time (Piggeries, Haslar hospital, Qinetiq, Fort Blockhouse for a start). There is a significant issue of CUMULATIVE IMPACT which has not been considered and is highly significant given the very limited access points and small roads such as Fort Road which is narrow and residential, Clayhall Road which is narrow and residential and Haslar Bridge.

Additionally, no consideration has been given to the strong likelihood that phase 1 of the IRC will be up and running and in full operation 24/7 whilst at the same time, phase 2 will potentially be under construction. There is no thought as to how this will be managed in order to prevent detrimental impact to local people. Where will the contractors park? Where will the site access be? **Fort Road is not suitable for this due to the proximity of homes. (diagram 6)**



Diagram 6 showing proposed construction access with blue arrows

Recognised standards state that a working buffer is required normally starting at around 15 metres or more. Given that the boat storage yard gates are 5 metres from the next home and 9 metres from the home opposite, the proposed access on Fort Road **cannot be used as site access.**

9. Environment and ecology

The ecology report is out of date as it must be undertaken within 12 months. It is dated 2023.

Badger setts are definitely on site under scrub towards the edge of the playing fields, badger activity is seen on regular basis in the summer evenings (*photo 4*) and setts have been witnessed by current contractors (one contractor reported stumbling into a hole which turned out to be a badger sett!)



Photo 6 taken 6 July 2026 of badger on Fort Road having just come from the site (gates to left of photo)

EXTENSIVE tree planting, inside and outside of the perimeter fence MUST be undertaken to replace lost habitat and vegetation barriers. Especially as the only mature trees on the site have already been unnecessarily felled and the landscape plan clearly shows that the rest will also be felled.

Trees MUST be planted in the verge on Fort Road, outside of the perimeter fencing to help to soften the harsh exterior.

It is extremely disappointing to read that ALL existing trees on the site and car park are to be felled and replaced with just 13 saplings! Clearly that is not acceptable and hundreds of trees need to be planted as well as significant vegetation in order to replace lost habitat. Clearly they will not become a barrier for noise, light and air pollution for many decades, if at all.

Whilst the planting of trees and shrubs is extremely important and to be encouraged, it should be noted that the provision of such planting does NOT mitigate effectively against noise, light or air pollution and should not be used as an excuse for poor design and lack of effective mitigations within the design itself.

By going ahead with this over-development, on this scale and proximity to neighbouring homes, you will make our homes COMPLETELY UNSELLABLE and WE will become the PRISONERS IN OUR OWN HOMES.

A far better solution would be to expand other sites that are no where near residential areas, such as Campsfield, which has plenty of capacity for expansion and would not impact upon anyone!

WE LIVE JUST A FEW METRES FROM THE PERIMETER !