

Written Representation

Crown Development Application CROWN/2026/0000005

Expansion of Haslar Immigration Removal Centre, Dolphin Way, Gosport PO12 2AW

Submitted by: David Peake, Gosport Resident, PO12

1. Scope of This Representation

This representation concerns the interaction between the proposed Phase 2 expansion of Haslar IRC and the emerging Gosport Borough Local Plan 2042 (GBLP 2042), which is expected to be submitted for examination later this year. It does not address immigration policy or the principle of immigration detention. It is confined to planning matters relevant to the Inspector's consideration of this application.

The representor has submitted formal Regulation 19 representations to the GBLP 2042 examination on the soundness of the plan's Haslar Peninsula policies (RA3–RA7). This representation draws on matters already placed on the public examination record. No material is introduced that has not already been raised with Gosport Borough Council through the statutory plan-making process.

2. The Local Plan Does Not Acknowledge the IRC

The GBLP 2042 Publication Version treats the Haslar Peninsula as an integrated regeneration area. Policies RA5, RA6 and RA7 allocate adjacent sites for marine employment, residential conversion and heritage-led regeneration respectively. The plan contains detailed policies for each, including specific infrastructure requirements, delivery expectations and design standards.

The plan contains no reference whatsoever to the Haslar Immigration Removal Centre — neither the existing Phase 1 facility nor the proposed Phase 2 expansion. The IRC does not appear in any policy, supporting text, site allocation, constraints map, infrastructure schedule or evidence base document. This is despite the IRC site being directly adjacent to the RA5, RA6 and RA7 allocations, and despite the Ministry of Justice having previously promoted the site for approximately 225 dwellings during the Regulation 18 consultation in 2021 before withdrawing it in July 2022.

The Inspector considering this Crown Development application should be aware that the local planning authority's own emerging Local Plan proceeds as if the IRC does not exist. There is no local policy framework against which the cumulative impact of the IRC alongside the adjacent plan allocations can be assessed.

3. Crown Development Is Not Subject to Compulsory Section 106 Obligations

The GBLP 2042 relies on Section 106 planning obligations to secure critical infrastructure contributions from development on the Haslar Peninsula, including sea wall maintenance, transport mitigation and community infrastructure. The plan acknowledges at paragraphs 3.160–3.161 that sea wall maintenance costs “will be substantial” and that “a bespoke package of Government financial support will be needed.” Paragraph 3.346 confirms that long-term maintenance of flood risk management measures “will be secured through a Section 106 planning obligation (or equivalent).”

Crown Development is not subject to compulsory Section 106 obligations. If approved, the largest single facility on the Haslar Peninsula — a 600-bed detention centre — will make no contribution through the planning system to the sea wall maintenance, transport infrastructure or community facilities that the Local Plan depends upon. The plan does not acknowledge this gap, and no alternative mechanism for securing equivalent contributions from the Crown is identified.

4. Nutrient Neutrality and the Solent Protected Sites

The GBLP 2042 requires all new residential development and overnight accommodation to demonstrate nutrient neutrality to avoid harm to Solent Special Protection Areas and Special Areas of Conservation (Policy D5, paragraphs 2.167–2.169). The plan explicitly states that mitigation “will be secured through a Section 106 agreement and planning conditions” (paragraph 2.170). The Council maintains a Nutrient Register to track cumulative mitigation across the borough.

A 600-bed immigration removal centre generating wastewater from up to 600 detainees plus operational staff represents a significant additional nitrogen source discharging into the Solent

catchment. Crown Development is not subject to compulsory Section 106 obligations, and Section 106 is the plan's sole identified mechanism for securing nutrient mitigation from new development. The plan's cumulative nutrient assessment does not include the IRC, and the Council's Nutrient Register — which coordinates mitigation across the plan area — cannot account for a development outside its planning control.

The result is two parallel processes operating on the same peninsula without coordination: the Local Plan's nutrient neutrality framework and the Crown Development's own Habitats Regulations assessment. The Inspector should satisfy themselves that the cumulative nitrogen impact of the IRC alongside the adjacent plan allocations has been assessed and that adequate mitigation is secured through a mechanism available to the Crown.

5. The Transport Evidence Base Does Not Model the IRC

The Transport Assessment 2026 (Stantec, ref 332611849), which forms part of the GBLP 2042 evidence base, models dwelling-based trip generation for the Haslar Peninsula. It does not model a 600-bed immigration removal centre. The traffic, servicing, shift-pattern staff movements and emergency vehicle requirements of a facility of this scale are not accounted for in the transport evidence underpinning the Local Plan.

Hampshire County Council, as highway authority, confirmed in its Regulation 19 representation (Rep 173, 16 April 2026) that increased development on the Haslar Peninsula has not been factored into the sub-regional transport model. The highway authority's own representation corroborates the gap in the transport evidence.

No transport modelling exists — in the Local Plan evidence base or, to the representor's knowledge, in the Crown Development application documents — that assesses the cumulative transport impact of a 600-bed IRC operating alongside the adjacent plan allocations on the single-access Haslar Peninsula.

6. Summary

This representation raises four matters for the Inspector's consideration:

- (a) The emerging Local Plan contains no reference to the IRC, meaning there is no local policy framework for assessing cumulative impact on the Haslar Peninsula.
- (b) The absence of compulsory Section 106 obligations for Crown Development means the largest facility on the peninsula will not contribute to infrastructure the Local Plan depends upon, and the plan identifies no alternative mechanism.
- (c) The plan's nutrient neutrality framework cannot account for the IRC's nitrogen contribution to the Solent protected sites, creating uncoordinated parallel environmental assessments on the same peninsula.
- (d) No transport modelling assesses the cumulative impact of the IRC alongside the plan's adjacent allocations, a gap independently corroborated by the highway authority.

These matters are relevant both to this Crown Development application and to the forthcoming examination of the Gosport Borough Local Plan 2042. The representor respectfully asks that the Inspector take them into account when determining this application.

David Peake

Gosport Resident, PO12

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***Disclosure:** This representation was prepared with AI assistance. All factual claims are sourced from publicly available documents as cited. The representor is responsible for the content and its submission.*