

Detention Forum Haslar Response

Objection to Haslar IRC expansion, CROWN/2026/0000005

Dear Planning Inspectorate,

We are writing to object to the Home Office's proposal to expand Haslar Immigration Removal Centre in Gosport. The application reference is **CROWN/2026/0000005**.

Haslar has not yet re-opened. The Home Office says the refurbished centre would hold up to **130 people**, with reopening expected in **2027**. The current application seeks permission to add up to **470 more detention places**, taking Haslar to a **600-bed detention centre**.

We are responding as a network of over 60 independent organisations across the UK united by our concern at the how caused my immigration detention to the mental health and well-being of people who are detained.

We object for the following reasons:

The need for expansion has not been properly shown

The Home Office has not clearly explained why 470 extra detention places are needed at Haslar specifically. This is especially concerning because Haslar has not yet re-opened. The Home Office is asking for permission to expand the site to 600 places before the refurbished 130-bed centre has opened or been tested in practice.

The Home Office should be required to explain why existing IRC capacity is not enough; what alternatives have been considered, including alternatives to detention; why the expansion has to happen at Haslar; why it is asking to expand Haslar before the reopened centre has operated in practice; why a locked 600-bed detention centre is suitable on this coastal site; and how the impacts on flooding, emergency evacuation, local services, healthcare, traffic, public access, ecology and the local community would be managed.

This matters because the Home Office is relying on claimed need to justify a very large expansion. **The expansion should not be approved as the Home Office has not made the case that this additional detention capacity is needed.**

Furthermore, we are concerned that the Home Office is by-passing established local democratic structures of accountability to be able to push through a scheme that they have been unable to justify.

Human impact and detention harm

Immigration detention causes serious harm to the people held there; all of the academic research supports this claim of harm. The effects of that harm do not stop at the perimeter fence. Families, legal representatives, community groups, health and

advice services, faith groups, local residents and local authorities are often left responding to the consequences of detention, including distress, release into hardship, safeguarding concerns, destitution, emergency support needs, removal, protest and public concern.

The application does not properly address this harm or the wider impact of expanding detention capacity at Haslar.

We understand that the Planning Inspectorate's decision will focus on material planning considerations, but this representation is also part of the public record.

Humanitarian concerns are valid and should be recorded, especially where they reinforce the need for full scrutiny of a development of this scale and sensitivity.

Public scrutiny and missing information

There are two problems with public scrutiny in this application.

First, the Home Office has applied for outline planning permission, with only access being decided at this stage. This means the Planning Inspectorate is being asked to decide whether the expansion should be allowed in principle, and how people and vehicles would get in and out of the site.

Other important details may be dealt with later, including the final layout of the buildings, what the buildings would look like, landscaping, and the detailed size and design of the development. This means people are being asked to comment now on whether Haslar should become a 600-bed detention centre, before all the practical details are finalised.

Second, some important information is not being made available for full public consideration because it has been treated as official sensitive information. This includes information about site layout, development parameters, elevations and sections, floor plans, roof plans, landscaping, lighting, accommodation blocks, the Care and Separation Unit, the dining hall, flood evacuation, coastal modelling, ecology and biodiversity, transport and travel planning, local community impact, heritage, and landscape and visual impact.

Some security-sensitive information may need to be protected. But the public still needs enough information to understand the planning impacts.

This is especially important because, if outline permission is granted now, the basic principle of expanding Haslar into a much larger detention centre would already have been accepted. Later stages would usually focus on the details of how the expansion is built, rather than reopening the question of whether the expansion should happen at all.

The flood and coastal modelling also contains assumptions and limitations. The Coastal Modelling Report states that outputs are only as good as the data inputted, that the model is a simplified representation of the existing ground levels, that roughness values involve modeller preference, and that future climate-change allowances could change and require the model to be revised [1st Horizon, Haslar IRC, Gosport Coastal Modelling Report, Rev E, 17 April 2026, section 8.0]. The Planning Inspectorate should not treat modelling as resolving the risk unless the underlying assumptions and limitations are properly tested.

Without enough clear public information, it is very difficult for people to understand what a 600-bed detention centre at Haslar would mean in practice, or to respond properly. The application should not be approved unless the public has enough information to scrutinise the proposal and its impacts.

Flood risk, coastal safety and climate change

Haslar is a coastal site next to the Solent. The Flood Risk Assessment says the site is partly in Flood Zone 3, is over 1 hectare, and is at risk of surface water flooding. It also says the proposed IRC expansion is classed as a “more vulnerable” use [1st Horizon, Haslar IRC, Gosport Flood Risk Assessment, Rev E, 1 May 2026, paras 2.1.6 and 1.8].

This matters because Haslar would be a locked detention centre. People detained there would not be free to leave if there was a flood warning, severe weather, a failure of flood defences or another emergency.

There are also serious concerns about surface water flooding, including safe access to and exit from the site during severe weather. The Flood Risk Assessment identifies two areas of potential high-risk surface water ponding in the north of the site, and states that the route used to enter and leave the site has a high risk of surface water flooding [1st Horizon, Haslar IRC, Gosport Flood Risk Assessment, Rev E, 1 May 2026, para 8.2.3].

Climate change makes these concerns more serious. The Flood Risk Assessment says it must take account of climate change over the lifetime of the development, including sea level rise, increased rainfall intensity, offshore wind speed and extreme wave height [1st Horizon, Haslar IRC, Gosport Flood Risk Assessment, Rev E, 1 May 2026, paras 2.1.3 and 2.2.3–2.2.4].

This is supported by the wider Partnership for South Hampshire Level 1 Strategic Flood Risk Assessment, which assesses flood risk now and in the future, taking account of climate change and cumulative development impacts. The strategic assessment includes East Solent coastal modelling for Gosport to Warsash and identifies a breach location at Haslar sea wall, south of Dolphin Way [Partnership for South Hampshire, Level 1 Strategic Flood Risk Assessment: Part 1 Main Report, 2024, paras 3.6.2 and 3.6.5–3.6.7; Appendix B1, East Solent Model Re-Simulations, 2024].

The Coastal Modelling Report prepared for the application gives sea-level rise estimates from a 2017 base year to 2125 of 1.093m under the higher central allowance and 1.467m under the upper end allowance [1st Horizon, Haslar IRC, Gosport Coastal Modelling Report, Rev E, 17 April 2026, Table 2.3].

Coastal Partners, the council's flood risk and coastal erosion specialists, have also warned that the site will be increasingly affected by climate change and will move further within Flood Zones 2 and 3 during the lifetime of the development. They also noted that there is no current or proposed investment to improve the flood defence, and that Environment Agency coastal erosion mapping shows the site at risk of erosion

by 2055 [Gosport Borough Council pre-application advice / Coastal Partners comments, reproduced in Appendix C to the Haslar Planning Statement].

The Home Office has produced a Flood Evacuation Management Plan and relies on measures such as raised floor levels, flood-resilient construction, flood warnings, staged evacuation procedures and drainage systems. But the existence of an evacuation plan does not remove the planning concern. It shows that flood evacuation is a serious operational issue.

The Flood Evacuation Management Plan says Haslar would have capacity for 600 beds and that, in some circumstances, residents may need to be evacuated in stages, with people moved to another IRC or holding centre if transport is delayed [1st Horizon, Haslar IRC Flood Evacuation Management Plan, Rev F, 10 April 2026, paras 2.2.1 and 3.2.1]. It also says that, in an extreme flooding event, the whole site would be required to evacuate [1st Horizon, Haslar IRC Flood Evacuation Management Plan, Rev F, 10 April 2026, para 2.3.4].

The Coastal Modelling Report also shows why the breach scenario needs proper scrutiny. It says that, under the modelled breach scenario, the maximum modelled flood depth within the developable area exceeds 1.20m, and that the south-eastern boundary of the proposed buildings shows typical flood depths of 1.20m to 1.50m [1st Horizon, Haslar IRC, Gosport Coastal Modelling Report, Rev E, 17 April 2026, paras 7.1.2–7.1.3].

The Planning Inspectorate should require clear evidence that these arrangements would be realistic and sufficient for a locked 600-bed detention centre, including during coastal flooding, surface water flooding, storms, sea level rise, flood defence failure and emergency evacuation. This should include evidence about detained people, staff, visitors, emergency services, escort vehicles, transport providers and the local road network.

Healthcare and emergency services

The Home Office's own assessment accepts that access to secondary care within the local area is part of healthcare provision at the IRC. This means Haslar would not be completely self-contained.

A 600-bed detention centre could create demand on local NHS services, emergency services and secure transport arrangements, including planned hospital appointments, emergency escorts, ambulance use, hospital care, mental health crisis support, medication issues and other urgent healthcare needs.

The Planning Inspectorate should require clear evidence about what this would mean for services in Gosport and the surrounding area, including whether local NHS bodies, ambulance services, police, fire and rescue services have confirmed that they can safely manage the additional demand.

Local infrastructure, public access and environmental impact

A 600-bed detention centre would not just affect the land inside the secure boundary. It could also affect roads, traffic, parking, construction movements, emergency access,

public access to the coast, wildlife, ecology, biodiversity, landscape, heritage and the character of the area.

The expansion would involve more buildings, fencing, lighting, CCTV, hardstanding, internal roads and operational activity. The application site also includes field areas, car parking, grassed land and land near the coast. The proposal includes changes to the England Coastal Path.

Public access to the coast is important. The Planning Inspectorate should carefully consider whether the expansion would affect the safety, openness, accessibility and character of this part of the coast, as well as the experience of nearby residents and people using the area.

The site is in a sensitive coastal environment, and Haslar is near historic buildings and heritage sites, including the Haslar Barracks Conservation Area and Fort Monckton. The Planning Inspectorate should require clear evidence that the proposal would not cause unacceptable harm to local infrastructure, ecology, biodiversity, protected habitats, landscape, public access, heritage or the character of the area.

The Habitat Regulations Assessment identifies six European designated sites within the zone of influence, including Solent and Southampton Water Ramsar and SPA, Portsmouth Harbour Ramsar and SPA, Solent and Isle of Wight Lagoons SAC, and Solent and Dorset Coast SPA [1st Horizon, Haslar IRC, Stage 01 Habitat Regulations Assessment and Stage 02 Appropriate Assessment, Rev H, 21 May 2026, section 6.1]. The same assessment identifies potential impacts during construction and operation, including hydrological nutrient discharge, in-combination effects with other development, loss and disturbance of functionally linked land used by wintering birds, and noise, lighting and visual disturbance. This means the ecological concerns are not just general concerns: the application relies on mitigation and off-site measures to address identified risks [1st Horizon, Haslar IRC, Stage 01 Habitat Regulations Assessment and Stage 02 Appropriate Assessment, Rev H, 21 May 2026, sections 4.1 and 5.0].

The ecology documents also rely on the fact that Haslar would be a secure IRC, with no movement of residents into surrounding areas, to say there would be no increase in recreational pressure on European sites. That should not be treated as a neutral point. It shows again that the environmental case is partly built around the locked nature of the facility.

The Waste Statement also shows that some practical operational details are still being pushed to later stages. It says exact construction waste volumes cannot be known at this stage, and that the principal contractor would later need to prepare a Site Waste Management Plan. For operational waste, it says exact volumes cannot be known until the operational waste strategy is developed [AtkinsRéalis, Haslar IRC Waste Statement, 17 March 2026, sections 3.0 and 4.1].

Operational waste would not just mean ordinary household rubbish. The Waste Statement refers to food waste, cooking oil, medical waste, bulky waste, WEEE, batteries, hazardous waste and residual waste. The Planning Inspectorate should consider how waste, servicing and operational arrangements would work for a 600-

bed secure facility on this site [AtkinsRéalis, Haslar IRC Waste Statement, 17 March 2026, section 4.1].

Request for refusal and public inquiry

For these reasons, we object to the application and ask that it is refused.

If it is not refused at this stage, we ask the Planning Inspectorate to examine the application through a full public inquiry after the consultation closes.

This application raises serious questions about flood risk, coastal safety, climate change, emergency evacuation, the scale of the proposed expansion, local infrastructure, healthcare and emergency services, public access to the coast, ecology, heritage, waste, the evidence for the expansion, the harm caused by detention, and the impact of missing or withheld information.

These issues should not be decided through written representations alone. A public inquiry would allow the Home Office's case to be scrutinised in public and the evidence to be properly tested before any decision is made.

Yours faithfully,

Jonathan Ellis

On behalf of

The Detention Forum – www.detentionforum.org.uk

4th August 2026