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My reference

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CROWN/2026/0000005

Date

7th August 2026

Email



For attention of the Crown Development Case Team

Outline Planning Application with all matters reserved (except for access) for the expansion of Haslar IRC comprising the development of new accommodation blocks and ancillary supporting accommodation, the conversion and expansion of existing site infrastructure including internal roads, demolition of existing structures, minor amendment to coastal path to accommodate the creation of additional car parking, landscaping and associated site infrastructure. Haslar Immigration Removal Centre (IRC), Dolphin Way, Haslar, Gosport, PO12 2AW

The Local Highway Authority (LHA) wish to make the following comments in relation to the above application.

The Applicant has submitted a Transport Assessment (TA) dated April 2026. The proposal is for an extension to the Haslar Immigration Removal Centre (IRC) to accommodate an additional 470 residents, increasing the number of bed-spaces at the site from 130 ("existing" IRC, opening 2027) to a total of 600 beds. A staff car park will also be provided to the southwest of the site as an extension of the existing Haslar Sea Wall public car park, which is accessed via Military Road.

Active Travel

It is recognised that due to the nature and security requirements of the land use, and the timings of the shift patterns, there may be some limitations in the opportunities for uptake of sustainable modes of travel to work for staff. However, it is anticipated many staff will come for the local area (60.9% of staff trips forecast to come from Gosport) and the LHA consider opportunities for sustainable travel should be maximised. It is also noted that the Applicant

forecasts 20% of staff to travel to the site by 'non-car alternative modes', basing parking provision on this assumption. To realise this, appropriate opportunities to travel sustainably will need to be provided.

There is currently footway provision to the site, including both sides of Fort Road and onwards via Clayhall Road and Haslar Road towards Gosport Town centre. Footways are generally narrower than the desirable width and include further narrowings/ obstructions at various locations.

There are no cycle facilities in the vicinity of the site, the nearest being Crescent Road, c.1km from the site. There are no cycle facilities linking to Gosport Town Centre.

Section 4.7 of the TA relates to cycle parking. While parking provision is a matter for the LPA, it is noted this section has been redacted. Cycle parking should be high quality (secure, covered and easily accessible / convenient to use) to promote cycling as an attractive alternative to driving to the site.

It is noted the Travel Plan assumes an initial 5% mode share for both walking and cycling and a 2.5% increase in the use of these mode over the first 5 years. To realise the initial mode share forecast or achieve the proposed uplift, the LHA consider improvements to the walking and cycling network in the vicinity would be required. The applicant should consider implementing or contributing towards appropriate improvements set out in the adopted LCWIP (particularly route 265), the Fareham and Gosport Transport Strategy (March 2026) and Gosport Borough Council's living list of cycling and walking improvements.

Public Transport

The nearest bus stop is on Clayhall Road (flag and pole, no shelter) which is served by the infrequent First Bus Service 11, which runs a total of 4 services between 10am and 3pm. There is no realistic prospect of staff being able to utilise this service for commuting purposes. There is no other bus provision within the vicinity of the site at present, with the nearest useful commuting services stopping at Gosport Town centre or on Stokes Bay Road, both, c.2km from the site.

First Bus Service 11 between Fareham and Gilkicker Road is currently supported by Hampshire County Council. With appropriate funding the schedule could be increased to support staff (and visitor) travel to the site. A contribution may be considered appropriate to achieve this, the value of which should be discussed with the LHA. The Travel Plan target is for an increase in bus use from 1% to 2.5%; given the current scheduling of the only bus in the vicinity of the site, it is difficult to see how a 1% mode share would be achieved, and a 2.5% mode share would, in the LHA's view, only be achievable through an enhanced service.

Local Plan policy LP3 mentions provision of a new bus service. Implementation of this is currently not proposed by any other development in the vicinity and cannot be relied upon to come forward in the future.

The Gosport Ferry runs a frequent service between Gosport and Portsmouth, including the only realistically accessible railway station (Portsmouth Harbour). It is however 2.2km from the site with limited onward sustainable mode options, other than a c.30 minute walk, to complete the journey to the site.

Public Rights of Way (PRoW)

King Charles III England Coast Path (KCIIIIECP) currently routes around the northern, eastern and southern parameter of the site and the Solent Way along the western parameter.

KCIIIIECP is proposed to be realigned to accommodate the new permanent car park on the western boundary of the site. It would run down the western boundary of the proposed car park. It is not clear how this path ties into existing provision at the southwestern corner of the site, or what security measures are proposed here to stop vehicular access. Clarity should be provided.



The proposed re-routing of the section that currently runs through the Haslar Sea Wall car park would require a variation to change the legal route. The LHA are aware that comments on behalf of the KCIIIIECP - Solent to Sussex Trail Partnership have been made in relation to this planning application. These largely set out who is responsible for the path and the requirements for realignment. However, comments do also raise that the development should take into consideration traffic movements on Dolphin Way, which will increase as a result of the proposals, and aim to minimise or mitigate conflicts with pedestrians walking the KCIIIIECP. While it is acknowledged this is not publicly

maintainable highway, Dolphin Way is part of the site access strategy; as such, the LHA wish to ensure safe access is provided for all users and therefore support this request.

Vehicular Site Access

The primary vehicular access will remain from Dolphin Way for loading and unloading of persons and servicing. Dolphin Way is a private road, not adopted highway for vehicular use. Due to parking, which is proposed to be retained and, from the drawings, formalised with marked bays on Dolphin Way, it operates as a single lane. The following comments relate to this access:

- Tracking has been shown for a 10m rigid and the typical 11.2m refuse vehicle. The TA states that larger vehicles may enter the site and therefore the largest vehicle expected (however infrequent) should be included in the tracking drawings.
- The applicant has stated the tracking is at 20mph which is considered reasonable.
- The proposals as shown demonstrate there is nowhere for vehicles to suitably pass between the site access and Fort Road; the hatched areas are too small for larger vehicles to enter (these may be appropriate for cars, but this has not been demonstrated).
- There is no direct intervisibility over the entire length between the site access and Fort Road. The applicant has shown intermittent forward visibility, but this does not demonstrate how vehicles will pass and only that they can see each other from certain locations; larger vehicles would have to reverse. This may result in conflicting traffic stopping unexpectedly when leaving Fort Road, or having to reverse onto Fort Road.
- Passing places should not be marked as yellow hatched boxes; in terms of the highway code, these should not be entered unless the way ahead is completely clear.
- Priority working signage is proposed. Such systems only work over short lengths and require full intervisibility between each end of the priority working section.
- Tracking drawings should be provided to demonstrate vehicle types accessing the site can all enter and leave the site in a forward gear.

An emergency vehicle only access will be retained and upgraded onto Fort Road as set out in paragraph 4.2.8 of the TA. The LHA have no concerns with this arrangement.

A new staff access, including what is understood to be the only pedestrian and cycle access to the site, and car park extension is proposed via Military Road/ Fort Road. The only drawing of this proposal appears to be at Figure 4-7 of the TA. The following comments are made:

- The proposals aim to improve the existing carpark and entrance/ exit. It is however not clear what is existing infrastructure and what is new. A suitable highways access drawing should be provided.
- Due to the clear intensification of use, visibility onto Fort Road should be demonstrated. Visibility splays should be based on recorded speeds. The proposed 'Y' distance must be based on the recorded 85%ile speeds as per HCC TG3 3.1.3 to 3.1.8. Where applicable the applicant should ensure wet weather adjustments are applied to the recorded speeds as required under HCC TG3 3.1.7.
- Furthermore, intervisibility should be assessed between the car park access and Fort Road, given the bend in the road. This should include a visibility assessment for house number 33 and the interaction with Military Road to the southwest.
- Tracking has not been provided for this car park. Suitable vehicle tracking should be provided between Fort Road and the carpark given the bend. This should demonstrate 2-way vehicle movements can be accommodated for the entire length.
- Tracking speeds must comply with the requirements of HCC TG2 3.2.10
- Pedestrian access between car park and Fort Road should be considered and demonstrated, particularly as this is the only pedestrian and cycle access to the site.

Suitable drawings for all highway related proposals should be updated/ produced and provided for review by the LHA with the aim of addressing the comments above. A Stage 1 Road Safety Audit (RSA1) must be completed and submitted on all proposed highway related works; this should include the designer's response to any problems raised.

While the level of EV charging points has been redacted, this is stated as 5.8% of the total spaces, which appears appropriate.

It is noted a visitor minibus will run between the site and Gosport ferry and bus terminals, but the times of operation and frequency of this have been redacted. Nevertheless, the LHA do not anticipate this will have a significant impact on the operation of the highway network. However, further details are required regarding site visitors:

- Are visitors required to use the minibus? If not, and they choose to drive to the site, what, if any, parking is provided and/ or how will inappropriate overspill visitor parking be controlled?
- Does the Applicant propose provision of this minibus is secured in perpetuity through any forthcoming planning approval? The LHA considered this necessary.

Furthermore, use of this minibus would be highly beneficial to provide a means of staff travel at shift change times (when it's assumed visits would not be allowed) to facilitate staff accessing the site via sustainable modes. This should be included in the proposals and secured in perpetuity as part of any future permission.

Staffing Profile and Parking Arrangements

This section has been included to demonstrate adequate parking has been provided. The LHA is aware of local concerns regarding inappropriate overspill parking resulting from the existing site refurbishment. The information in this section has however been redacted, so the LHA is unable to assess if adequate parking is being provided within the proposed car park and on Dolphin Way to avoid unacceptable overspill parking within the highway. It is also apparent that shift patterns are not fixed in perpetuity; changing shift patterns to busier times of the day could result in future concerns. Given the confidential nature of this application, provision of further information on a confidential bases to the LHA is required to address these concerns.

Confirmation of the number of parking spaces proposed on Dolphin Way should be confirmed, as a range (35 – 43 spaces, assumed to be Option 1 - TA Figure 4-3 and Option 2 - TA Figure 4-4 respectively) does not allow the LHA to assess if either adequate parking has been provided, nor if the operation of Dolphin Way is safe and suitable. It is noted that the tracking drawings provided appear to be based on Option 1.

A temporary expansion of Haslar Sea Wall car park is proposed as part of the IRC refurbishment stage of development. The layout and access arrangements of this car park have not been provided and should be submitted for review. Furthermore, it is assumed that this car park will not be available during construction of the permanent car park; as such, clarity on parking arrangements during this interim period should be provided, noting the current parking issues around the site.

It is noted that the existing 20 space Haslar Sea Wall public car park will be re-provided, as shown in figure 4-7. This is acceptable in principle; however, the LHA wish to see a better quality and more detailed design drawing of this arrangement for comment. This also applies to the arrangements for the permanent proposed car park; no dimensions within either carpark have been provided. Some isle widths appear narrow when compared to the parking bay lengths. Dimensions should be provided, as should tracking of the more challenging park spaces. Further comments may follow once this information and a clearer general arrangement drawing have been provided.

Traffic impact

The surveys undertaken in February 2023 are considered acceptable and show relatively light traffic flows on Fort Road.

The TA suggests use of a Traffic Regulation Order (TRO) to ensure appropriate parking in the vicinity of the site; this is supported by the LHA. A contribution of £12,312 (index linked) should be provided towards provision of a TRO in the vicinity of the site. It should be noted that this may extend beyond the indicative

area suggested within the TA, but will be appropriate to mitigate the site impact and allow for existing resident parking.

Regarding trip generation, staff numbers have been redacted, making it impossible for the LHA to comment. It is requested this information is provided to the LHA on a confidential basis. It is however noted that 80% of staff are forecast to travel by private vehicle; justification for this mode split, and for the other forecast mode split for the remaining 20% of staff trips, is required.

Similarly, visitor trips have been redacted; it is requested this information is provided to the LHA on a confidential basis.

Servicing trips have not been redacted and forecast 2 heavy and 2 light vehicle trips per hour between 9am and 5pm, totalling 64 movements across the day. Justification should be provided regarding how this forecast has been made. While this level of trips unlikely to have an unacceptable impact on the wider highway network in isolation, it needs to be considered in combination with other (redacted) trip generation. Furthermore, as all these trips would use Dolphin Way, the operation of this access road (and King Charles III England Coast Path) should be considered in light of this trip generation. The forecast level of HGV use (2 per hour) does not accord with the earlier statement in the TA, which says: *The site may infrequently be served by larger vehicles that this (a 10m ridged vehicle) however their movements can be managed as the IRC controls access to Dolphin Way.* Clarity regarding the level of HGV trips and how the suggested controls would operate should be provided.

The distribution of staff trips is considered acceptable. Regarding staff trip assignment, it is considered unlikely that 100% of vehicular trips will turn left from the Haslar Sea Wall public car park; a small proportion of trip will likely turn right towards residential areas within/ near to Gosport town centre. However, given this proportion is likely to be small, the LHA do not believe it will have a significant impact on this route or change the conclusions of the junction modelling.

The distribution and assignment of servicing trips is unjustified, but is considered adequate given the level of forecast trips generated. The distribution and assignment of visitor trips is acceptable.

A peak hour sensitivity test has been provided to consider an amendment to shift patterns, testing a shift change within the AM peak hour. However, only departure trips have been considered. For a robust sensitivity test, the LHA feel both departure and arrival trips should be included.

Once trip generation is agreed, a distribution diagram should be provided showing the total number of trips on the network for the peak hour sensitivity test a reasonable distance from the site, not just at the site access junctions. This will allow the LHA to review the potential impact on the wider network.

Junction capacity assessments have been completed for both Dolphin Way and the Haslar Sea Wall car park accesses. While the model set up has been fully redacted and therefore cannot be checked, these show both junctions operate comfortably within capacity, and are likely to continue to do so even if both departure and arrival trips were included. However, the modelling does not reflect possible operational issues with Dolphin Way itself given it is one-way working or the impact on the wider network. To assess the impact on the wider network and the operation of Dolphin Way, the information requested above relating to trip generation should be provided and the sensitivity test updated.

Personal injury accident data for the latest 5-year period has been obtained and submitted. This does not show any pattern of accidents that would be exacerbated by the proposed development.

Construction Traffic

The TA does not consider construction traffic. The LHA have received complaints in relation to the current refurbishment. A Construction Traffic Management Plan should be conditioned to be provided and agreed in consultation with the LHA prior to commencement of development. This must include adequate dedicated contractor parking provision on site.

Travel Plan

This Travel Plan has been assessed using Hampshire County Council's (HCC's) evaluation criteria for the assessment of travel plans – "A Guide to Development Related Travel Plans (2025)".

Section 3

This should include the following:

- Existing Site Layout Plan
- Site access
- Photographs – Pedestrian and vehicular site access [May be redacted in public versions of the travel plan]
- Total number of existing employees [May be redacted in public versions of the travel plan]
- Existing staff shift patterns – This should be a breakdown of the shifts for the existing Immigration Removal Centre (IRC) per the staffing profile provided in paragraph 4.3 [May be redacted in public versions of the travel plan]
- Existing staff locations – The travel plan should include a breakdown postcode of the current employees ([at an Area and District level only i.e. SO6 or PO13](#)) to illustrate where people may be travelling from and the viability of certain measures [May be redacted in public versions of the travel plan]

Area Definition	Average Distance	Number	Proportion
Havant, Waterlooville, Cosham, Emsworth & Hayling Island	Between 2 and 7 miles	144	51%
Portsmouth & Southsea	Between 4 and 7 miles	63	23%
Fareham & Gosport	Between 8 and 11 miles	31	11%
Petersfield or further north	Over 13 miles	15	5%
Southampton or further west	Over 20 miles	14	5%
Chichester or further east	Over 12 miles	13	5%
Total	-	280	100%

Table 2: Staff Travel Data (2021 Survey)

Section 4

This should include the following:

- Indicative Proposed Site Plan
- Cycling parking, including:
 - Number of spaces
 - Location
 - Quantum and Type- The travel plan should specify the number and type of cycle parking spaces that will be provided (see chapter 11 of [LTN 1/20 - Cycle Infrastructure Design](#))
- Total number of proposed employees [May be redacted in public versions of the travel plan]
- Visitor Minibus details [May be redacted in public versions of the travel plan]

Section 5

- This should include valid, site specific objectives, e.g. reduce SOV, increase sustainable travel, actively promote travel plan, etc.
- SMART (Specific, Measurable, Achievable, Realistic, Timebound) target setting should be included.
- Baseline mode-share data should be included using valid and site-specific data – Due to the unique nature of the site outlined in paragraph 5.1.2, the travel plan should use staff travel data from the existing IRC.
- A modal target table should be included, broken down by each mode-share biennially (see example below)

Mode	Indicative Baseline	Year 1	Year 3	Year 5
Driving a car or van				
Foot				
Passenger in a car or van				
Bus, minibus or coach				

Motorcycle, scooter or moped				
Total				

The LHA are unable to fully assess the travel plan's targets without further details of the existing IRC and the travel patterns of the staff that work there. The redactions throughout such as the hidden number of cycle parking spaces, details of the visitor minibus and details from the movement assessment, prevent the LHA from gauging the viability of related measures in the travel plan.

Regarding Monitoring, the following should be included:

- Recognition that HCC requires a 35% response rate for questionnaire surveys.
- Measures to ensure that this response rate is met, e.g., a voucher for supermarket or online retailer.

As it is expected that the number of staff working in the wider Haslar IRC will more than double, the travel plan must be explicit on whether the measures (i.e. employee voucher scheme) will apply to those working prior to the completion of the expansion.

Section 6

Regarding Management / TPC role, the overall cost of the appointment and retention of the travel plan will be based off the duties outlined in Section 6, the action plan and the following factors:

- The expected time spent on travel plan per week
- The number of weeks per year to be working on the travel plan
- The cost per hour cost per hour of the person acting as the TPC

Due to the nature of the operation, it is likely that the role will be carried out internally so this may be factored into the overall cost.

If the travel plan co-ordinator has not been confirmed when the full travel plan is submitted, the developer should nominate an 'interim travel plan co-ordinator' who will serve as the main point of contact for the travel plan.

Due to the nature of this application, the contact details should be sent to HCC via the dptravelplans@hants.gov.uk email instead of being included in the travel plan.

Regarding delivery and enforcement, there needs to be a section relevant to enforcement, which should include the following detail:

- Paragraph explaining the role of the Section 106 agreement including the value of the Travel Plan Cash Deposit (where applicable)
- Commitment to pay HCC's monitoring and approval fees
- Commitment to provide a Travel Plan Cash Deposit of equal value to travel plan measures

- Sanctions in the event of non-compliance

Section 7

There are some additional measures which should be considered for inclusion within this FTP. Some of these measures may be applicable only to residents or employees, or to both groups.

Existing Employee Benefits

The travel plan should include any existing employee benefits that the staff may be entitled to. These may include:

- Employers to consider provision of interest free loans to purchase season tickets (up to £5,000 can be provided without tax implications)
- Guaranteed ride home for staff in emergency situations
- Cycle to Work scheme (tax-free loans for staff)
- Pool bikes

If the developer or IRC operator is not party to any of the measures listed above, they should be considered for inclusion to assist achieve the target mode share.

Cycling

Bike services stations for staff.

Shuttle Service

A staff minibus should be included to assist with the 'last mile problem' caused by the distance from the IRC to the town centre. The staff service would make it easier for staff to access the buses as the Gosport Interchange, and Portsmouth bus and rail connections via the Gosport Ferry.

The applicant should ensure that both the visitor and employee services are sufficient (assessed with the existing staff locations and travel patterns, and staff shift changes for the proposed staff). Therefore, the FTP should outline:

- Details of the minibus provision (number of buses, number of seats etc.)
- Visiting hours / visiting pickup times (per pickup location, whether fixed or on ad-hoc basis)

Sustainable Travel Voucher / Reimbursement Scheme:

Following from the comments made on the Targets section, it is the LHA's suggestion that the TPC oversee the management of a 'sustainable travel reimbursement scheme'. This will provide an allowance for each employee to purchase multiple bus, ferry, train tickets, or cycle accessories. This will allow staff to try sustainable travel modes to and from the minibus' pickup/dropoff points which will take advantage of many bus, ferry and rail transport links.

The LHA believe this amount should set at £90 which is the price of a Gosport Ferry Adult 30-day or Stagecoach South Hants MegaRider Xtra ticket.

[REDACTED]

Marketing and Promotion

This should include the following:

- Provision of information to all visitors and staff on how to access the site by means other than the car through a variety of methods, including:
 - Personal travel planning
 - Newsletters
- Information packs for new recruits to be updated annually
- Staff feedback sessions
- Introduction of a personalised journey planning scheme'
- Advertising TP to staff through recruitment, e.g. how to get there for interview and on the website

Regarding Appendix A - Action Plan, the cost of the measure or action over the duration of the travel plan.

Larger copies of the following documents should be appended to the Travel Plan:

- The Existing Site Layout Plan
- The Indicative Proposed Site Plan
- Figures 1-1. 3-1, 3-2, 3-3, 3-4, 4-1, 4-2, 4-3 and 4-4, 4-5,
- The Site Location Plan

The FTP will require further amendments as set out above before it can be considered acceptable for submission in conjunction with the proposed site.

Recommendation

There are a number of areas where further information is required as set out in this response before the LHA can provide a recommendation. Until the additional information is provided the Highway Authority will not be in a position to agree the transport impacts of the development proposals and suitable mitigation. I look forward to receiving further information in due course at which point I will be able to provide an update on the position.

As noted above, the heavily redacted documents (both TA and FTP) make it impossible for the LHA to comment fully on the proposals. Full and unredacted documents should be provided to the LHA on a confidential basis to allow a full assessment.

I trust the above is helpful, should you wish to discuss further please do not hesitate to contact me.

Yours faithfully,



Transport Team Leader
Universal Services