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Environment Agency

Cushman & Wakefield
1 Colmore Square
Birmingham
B4 6AJ

Reference: PA-0008171/02
Customer reference: CROWN/2026/0000005
06 October 2026

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.

Dear Sirs,

Thank you for providing us with a revised Flood Risk Assessment (Flood Risk Assessment & Surface Water Strategy (Ref: 8607-R09) Rev F, dated 29/09/2026)) and Flood Evacuation Management Plan (Ref: 8607-R09-FEMP) Rev G, dated 29/09/2026), as received by email on 1 October 2026 from 1st Horizon.

We have reviewed the revised documents and set out our position and comments below.

Environment Agency position

We are satisfied that our previous objection to the proposal (as per our letter to Gosport Borough Council, dated 3 August 2026) **can be removed**, as the revised Flood Risk Assessment now includes a freeboard above the design flood level. However, we would recommend that **the following condition be attached to any planning permission granted in relation to flood risk**.

Condition – Flood risk

The development shall be carried out in accordance with the Flood Risk Assessment (Flood Risk Assessment & Surface Water Strategy (Ref: 8607-R09) Rev F, dated 29/09/2026), by 1st Horizon) and the following mitigation measure it details:

- **Finished floor levels shall be set no lower than 5.24 metres Above Ordnance Datum (mAOD) (as per sections 6.2.1 and 8.3.1 of the Flood Risk Assessment).**

This mitigation measure shall be fully implemented prior to occupation and subsequently in accordance with the scheme's timing/phasing arrangements.

The measure detailed above shall be retained and maintained thereafter throughout the lifetime of the development.

Reasons

To reduce the risk of flooding to the proposed development and future occupants and staff at the site.

The condition is in line with the Planning Practice Guidance (PPG) to the National Planning Policy Framework (NPPF) for Flood Risk and Coastal Change.

If the above condition is unable to be applied to any permission granted or requires amendment, we would wish to be notified so we can provide further advice.

Further comments/advice from the Environment Agency

Freeboard

We previously objected to the application as the submitted Flood Risk Assessment had not included any freeboard above the design flood level. The inclusion of freeboard when designing new developments in areas at risk of flooding is important as it provides an allowance for uncertainty in flood modelling and flooding mechanisms.

The revised Flood Risk Assessment now includes a suitable allowance for freeboard (600mm above the design flood level of 4.64mAOD). As this resolves the points we originally raised, we can remove our objection to the proposal.

Further flood risk considerations not within our direct remit

The following issues are not within our direct remit or expertise but nevertheless are important considerations for managing flood risk for this development. Prior to deciding this application, we recommend that consideration is given to the issues below. Where necessary, the advice of relevant experts should be sought.

- Adequacy of rescue or evacuation arrangements.
- Details and adequacy of flood proofing and other building level resistance and resilience measures.
- Details and calculations relating to the structural stability of buildings during a flood.
- Provision of an adequate means of surface water disposal such that flood risk on and off-site isn't increased.

The application includes a Flood Evacuation Management Plan (FEMP). Please note that our involvement with this development during an emergency will be limited to delivering flood warnings to occupants/users covered by our flood warning network. We therefore do not normally comment on or approve the adequacy of flood emergency response procedures accompanying development proposals, as we do not carry out this type of role /responsibility during a flood.

Planning practice guidance (PPG) states that, in determining whether a development is safe, the ability of residents and users to safely access and exit a building during a design flood and to evacuate before an extreme flood needs to be considered. One of the key considerations to ensure that any new development is safe is whether adequate flood warnings would be available to people using the development. In all circumstances where warning and emergency response is fundamental to managing flood risk, we advise local planning authorities to formally consider the emergency planning and rescue implications of new development in making their decisions.

Flood warnings

We note that the Flood Risk Assessment refers to the management staff onsite being registered with Floodline as part of the mitigation measures. To register for Floodline, the management staff will need to phone 0345 988 1188 or visit Sign up for flood warnings - GOV.UK. Floodline is a free service that provides warnings of flooding from rivers, the sea and groundwater, direct by telephone, email or text message. Anyone can sign up.

Flood warnings can give people valuable time to prepare for flooding. Flood warnings can also save lives and enable the emergency services to prepare and assist.

If you have any questions regarding the above, please contact

planningssd@environment-agency.gov.uk.

Yours faithfully,

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