

Gosport Borough Council - Development
Control
HIGH STREET, GOSPORT, PO12 1EB

Reference: PA-0008171/01
Customer reference:
CROWN/2026/0000005
03 August 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.

IMMIGRATION REMOVAL CENTRE, 2 DOLPHIN WAY GOSPORT GOSPORT BOROUGH PO12 2AW

Dear Planning Officer,

Thank you for contacting us.

This is our response to your consultation CROWN/2026/0000005.

Environment Agency position

In the absence of an adequate Flood Risk Assessment (FRA) we **object** to this application and recommend that planning permission is refused.

Reason

The submitted FRA does not comply with the requirements for site-specific flood risk assessments, as set out in paragraphs 20 to 21 of the Flood Risk and Coastal Change Planning Practice Guidance and its site-specific flood risk assessment checklist. The FRA does not therefore adequately assess whether the development will increase flood risk. In particular, the FRA fails to:

- Identify a suitable freeboard for the design flood level for the site, and therefore fails to ensure that flood risk mitigation measures for the site are adequate for the lifetime of the development.

Overcoming our objection

Modelling carried out as part of the FRA for the proposed development identifies that parts of the site will be subject to flood depths in excess of 1 metre in a 1 in 200 year (0.5% Annual Exceedance Probability event) plus climate change (2125 epoch, Upper End scenario) tidal flood. This is a significant depth of flooding that poses a risk to all users of the site, as well as the emergency services. The FRA proposes that new buildings on the site will be raised above the design flood level (4.64 metres Above Ordnance Datum), however it fails to identify a suitable freeboard to be added to this level. The inclusion of a suitable freeboard is critical as it addresses uncertainty within flood information and mechanisms, and will alter the required flood mitigation measures for the site. For this reason we object to the development.

To overcome our objection, the applicant should calculate a suitable freeboard for the proposed development using the freeboard guidance available at [Accounting for residual uncertainty: an update to the fluvial freeboard guide - GOV.UK](#), and the mitigation measures within the FRA and Flood Evacuation Management Plan should subsequently be updated.

If this cannot be achieved, we are likely to maintain our objection. Please re-consult us if a revised FRA is submitted and we will respond within 21 days of re-consultation.

Advice on flood risk issues that are not in our direct remit

Notwithstanding our comments above, prior to deciding this application The Planning Inspectorate must give consideration to the issues below. Where necessary, the advice of relevant experts should be sought. The issues include:

- Adequacy of rescue or evacuation arrangements
- Details and adequacy of an emergency plan
- 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

Please note that we do not normally comment on or approve the adequacy of flood emergency response procedures accompanying development proposals, as we do not carry out these roles during a flood. Our involvement with this development during an emergency will be limited to delivering flood warnings to occupants/users covered by our flood warning network.

The NPPF [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. As such, we recommend you refer to '[Flood risk emergency plans for new development](#)' and undertake appropriate consultation with emergency planners and the emergency services to determine whether the proposals are safe in accordance with paragraph 167 of the NPPF and the guiding principles of the PPG.

We have considered the likely duration, depths, velocities and flood hazard rating against the design flood for the proposal, which indicates that there will likely be a **danger for all people** (e.g. there will be danger of loss of life for the general public and the emergency services).

We remind you to consult with emergency planners and the emergency services to confirm the adequacy of the evacuation proposals.

If you have any questions regarding our response, please contact planningssd@environment-agency.gov.uk.

Yours sincerely,



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