



Development Management

Crown Development Case Team
Planning & Environmental Applications Service
Planning Inspectorate

Planning and Regeneration
Gosport Borough Council
Town Hall
High Street
Gosport
Hampshire
PO12 1EB
Phone: 023 9254 5645
Email: planning@gosport.gov.uk

6th August 2026

Dear Sir or Madam

Crown Development Application Ref: CROWN/2026/0000005

GBC/LPA Ref: 26/00216/CROWN

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 Gosport PO12 2AW

This response is sent on behalf of Gosport Borough Council in its role as Local Planning Authority for the above site.

Summary

For the reason set out below and expanded upon within this response, the Borough Council formally objects to the application as submitted and raises very strong concerns about the following:

- Firstly the Borough Council as Local Planning Authority is extremely concerned about the level of redaction of details on the submitted drawings and supporting documents which make a thorough assessment of the proposals very challenging and is contrary to the presumption in favour of transparency and openness in the planning process.
- The Council has very strong concerns, given the height and scale necessary to achieve the quantum of development proposed in the application, about the harmful impact on the setting of a number of adjacent designated heritage assets, in particular the Haslar

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Barracks Conservation Area and the Listed Buildings and Park at the former Royal Hospital Haslar.

- The Council has very strong concerns about the unknown assessment of cumulative traffic and reliance on an unconfirmed future bus service in the context of a constrained access to the site located on a peninsula and heavily redacted transport information.
- The Council is very concerned about the potential impact on protected species, including bats and reptiles, especially as the survey work undertaken is considered to be out of date and deficient.
- The Council is concerned that the Flood Risk Assessment submitted with the application is not adequate and reminds the decision maker that they will need to be satisfied that the development proposals would not be at risk of flooding and would not give rise to an increase in flood risk elsewhere.

LPA Comments

Principle of Development

As set out in Policy LP1: Sustainable Development, the GBLP takes a positive approach in generally supporting the presumption in favour of development in accordance with the policies of the NPPF subject to detailed local policy considerations which are set out in this report.

Policy LP3: Spatial Strategy, Point 2 states that development proposals will be permitted within the urban area (as defined on the Policies Map) provided that it accords with Policy LP10: Design and other policies in the Local Plan.

The majority of the application site is located within the urban area boundary. The area of the site comprising the former Council owned car park at Fort Road is located outside of the urban area boundary. The proposal utilises this existing car park for continued parking provision to serve the wider site. Policy LP3, Point 9 states:

‘9. Areas outside of the urban area will be safeguarded from development unless they are for appropriate recreational uses or development essential to the operational requirements of public and other essential services. Such exceptions will need to accord with Policy LP10: Design.’

Policy D2 of the emerging GBLP 2042 continues to define an urban area boundary, albeit a review of the boundary was undertaken and several changes made within the Borough. As a result, the Fort Road car park is now included within the urban area, and therefore when the emerging Local Plan is adopted, there would be a presumption in favour of development across the entire application site. The Council published an Urban Area Boundary Background Paper in February 2026 which sets out the rationale for this change:

‘The Fort Road Car Park has now been shown within the urban area boundary to provide greater flexibility of uses associated with adjacent Haslar Immigration Removal Centre. It is recognised that the site will need to remain open in character due to a covenant on the land associated with the military use to the west and also to reflect that the King Charles III England Coast Path runs through the site.’

While part of the site is currently located outside of the adopted urban area boundary, its use as a car park to support the development could be considered essential to the operational requirements of a public service (as set out in LP3, Point 9) and is therefore considered appropriate in principle in this instance. In addition, the emerging policy proposes to include the entire site within the urban area.

It should be noted that while the site itself is not within an identified Regeneration Area, the site is adjacent the Haslar Peninsula Regeneration Area. Policy LP6 of the GBLP identifies the Blockhouse site and Royal Haslar Hospital for regeneration for a mix of uses which conserve and enhance the distinctive built heritage and setting of the Haslar Peninsula. The emerging Local Plan continues to identify the Haslar Peninsula as one of five Regeneration Areas in the Borough which are key sites available to meet development needs. Policies RA3-RA7a set out further detail. Of key relevance to this application is the Council's ambitions to see the continued redevelopment of Royal Haslar Hospital (adjacent the IRC site) and heritage-led mixed use regeneration of the Blockhouse site when released by the Defence Infrastructure Organisation (DIO). The regeneration of both these sites as a significant new waterfront neighbourhood is one of the key objectives of the Council and has the potential to be transformative for Gosport, similarly the earlier residential allocation at this site would also have contributed to this wider vision. The Council therefore has serious concerns that the proposed scale of the IRC has the significant potential to detract from these wider regeneration objectives.

Notwithstanding the above, the lawful planning use of the wider site is as an Immigration Removal Centre and as such the proposals represent an intensification of an existing use rather than a change of use to an Immigration Removal Centre. Given this position and having regard to Policy LP3 of the Local Plan and Policy D2 of the emerging Local Plan, the proposals are considered acceptable in principle.

Heritage & Design

The proposal is located within, and is immediately adjacent to the Haslar Barracks Conservation Area with the site also adjacent to the Stokes Bay Conservation Area. The Haslar Peninsula Conservation Area is located to the north-east. Policy LP12: Designated Heritage Assets: Conservation Areas will therefore apply including point 2b. Policy LP12 seeks to conserve or enhance the character or appearance of existing conservation areas. Policy LP12, Point 2 supports development proposals provided the proposal meets the criteria set out in points a and b.

Pre-application advice was provided in relation to the proposals which raised concerns over the size, height and proximity to the Conservation Area and design of the proposed buildings. The current application is identical to that proposed at pre-application stage, with the buildings just moved a further 4m from the Conservation Area boundary (previously 20m, now 24m). It is considered that previous concerns have not been sufficiently addressed.

Notwithstanding the indicative nature of the drawings and that scale, siting, and appearance are reserved matters, it is disappointing that the elevations and site plan show a group of large buildings of a starkly utilitarian design lacking architectural merit and of a size and proximity to cause harm to the adjacent Conservation Area. The location of four No. three storey blocks of 12m in height, two of which are within 24m of the low slung, predominantly single storey historic barrack buildings is considered overbearing and harmful to the Conservation Area.

The sensitivity of developing this site, directly adjacent to the Conservation Area was recognised when the Haslar Barracks Conservation Area Appraisal was adopted, for the Haslar Barracks CAA states at p.22:

'The broader setting of the Conservation Area: The surrounding land.

'... The western boundary to the site should retain a landscaped strip of land between the existing buildings and any future development to its south-west: possibly with consideration given to tree planting and a footpath link to the waterfront to ensure a degree of separation. Any development would need to have regard to the context of the Barracks site to ensure it would not be overbearing in form or harm its setting.'

As Historic England set out in their pre-application advice: 'The current proposals do provide a bit of space between the conservation area and the detention centre buildings but could not be described as good neighbours. At three storeys they are rather larger than the single storey historic barrack buildings – probably large enough to appear over bearing'.

The indicative separation of the proposed accommodation blocks to the Conservation Area boundary is considered insufficient to overcome the overbearing relationship that the proposals will have on the Conservation Area. Whilst the slight increase in separation will allow for more planting between the Conservation Area and new buildings, screening can only mitigate negative impacts, rather than removing impacts or providing enhancement, it should not be regarded as a substitute for well-designed developments within the setting of heritage assets.

An overriding issue is the size and scale of the three storey buildings, which would out of keeping with the area, not just compared with the predominantly single storey buildings within the Conservation Area, but also the surrounding residential development which is all two storeys in height. The issue is exacerbated by the location in a flood zone, which will require raised floor levels resulting in the buildings appearing even higher.

The Design & Access Statement and Heritage Impact Assessment that support the planning application both refer to the dining block and CASU as single storey respectively. This is considered disingenuous as the plans, though redacted, are annotated showing a first floor, serving each building respectively. These buildings are considered particularly poor in design. The elevations look unbalanced as there are no windows at first floor level, which combined with the extended eaves height, results in an awkward, top-heavy composition.

Given that the current proposals are intended to expand the refurbished existing buildings and the degree of shared facilities, it is considered likely to be necessary that any new build blocks be located close to the existing buildings rather than further away which could reduce any harmful impact on the Conservation Area. In the event that a Reserved Matters submission were to come forward for the indicative proposals it is likely that a degree of harm would be found that would need to be off-set by demonstrable public benefit.

Archaeology

The application is supported by comprehensive Desk-Based Assessment which provides a clear and proportionate baseline for the archaeological potential of the site and assesses that there is a potential for remains relating to defensive activities and troop activities from the Napoleonic Wars, World War 1 and World War 2.

The report also states that the existing IRC to the north has been the subject of an

archaeological watching brief which has not revealed any significant archaeological remains and has confirmed Ground Investigation results, that also extend across the application site, which show that the site is overlain by significant deposits of made ground of modern date and that this has greatly reduced the potential for significant archaeological remains to be present, particularly within those parts of the site which would be subject to major new ground disturbance.

Given the reduced potential for archaeological remains to survive, the report recommends that a continuation of the mitigation scheme that was designed for the existing IRC site would be appropriate. This approach is considered to represent an appropriate and proportionate response to below ground archaeology. This could be secured through the imposition of a suitably worded planning condition to ensure compliance with Policy LP13 of the Local Plan.

Design

While it is recognised that detailed design is a reserved matter in this application and therefore there is still opportunity for significant improvement to be made through revised designs, it is considered that the proposals are currently not well designed in terms of scale, massing and detailing, nor do they have any regard to their setting. As such the proposals do not demonstrate that the quantum of development can be accommodated in a visually acceptable way. It is clear that this proposal detracts from its location and is clearly unable to demonstrate 'beautiful' design as the Government's NPPF expects, but more than this the proposal is of poor design and contrary to both national and local planning policies. It is recognised that the buildings are functional and could be suited to a utilitarian design but there are numerous examples where such buildings are well-designed and attractive. Given the sensitive context and presence of heritage assets, it is considered unacceptable that the scheme is stark and not in keeping with the considered design of many nearby heritage assets, including those in the adjacent Haslar Barracks Conservation Area.

Impact on Residential Amenity

The closest existing residential properties to the site are those on the eastern side of Fort Road (numbers 13 to 33 inclusive) whose rear gardens back into it. Properties on the western side of Fort Road face the site across the carriageway of Fort Road. The undeveloped part of the site that forms the bulk of the Phase 2 measures in excess of 200m metres wide (north to south) and at least 100 metres deep (east to west). Given these dimensions it is considered that a development of the scale for which Outline planning permission is sought could be delivered in a manner that would not give rise to any significant harm to the residential amenities of the occupiers of neighbouring properties in terms of loss of light, loss of privacy or any overbearing or unneighbourly sense of enclosure. Residents may experience a loss of outlook from rear windows, however, this is across third party land and is not protected by planning policy.

Given the proximity of the site to residential properties it is essential that the impact of any construction works (in the event planning permission were to be granted) is managed and mitigated through the approval and implementation of a Construction and Traffic Management Plan.

Ecology

Brent Geese

The application is accompanied by a shadow Habitats Regulations Assessment and Appropriate Assessment which deals with the loss of the site as an identified core site used by overwintering birds. It is understood that the provision of a geese reserve on land out outside the Borough has been agreed by Natural England in principle. The appointed person who will determine the application will, as Competent Authority, need to satisfy themselves that this matter has been properly considered and appropriate mitigation secured.

Nutrient Neutrality

It is noted that a Nutrient Neutrality Assessment with budget calculator accompanies the application which identified a net TN load of 212.05kg TN/year which is proposed to be mitigated through nutrient credits purchased from the Knowle Sewage Treatment works wetland scheme. The decision maker will need to seek the views of Natural England and satisfy themselves that this matter has been properly considered and appropriate mitigation secured.

Biodiversity Net Gain (BNG)

The application is supported by a 'BNG Design Stage Report' which has been received by the Council's Ecologist who confirms that it is acceptable. However, the BNG report is not accompanied by a BNG metric setting out the baseline condition and value of the site against which future BNG enhancements can be assessed.

In addition to the national BNG requirement, the proposal should address Policy LP41: Green Infrastructure which seeks to maintain and enhance the Borough's Green Infrastructure Network through the provision of on-site infrastructure and where appropriate contributions towards off-site provision. Point 1b seeks to secure a net gain in biodiversity; green infrastructure measures should contribute to a net gain in biodiversity on the site. The Council considers that there is an opportunity to enhance local biodiversity in most development through a range of appropriate measures. For this proposal, this could include swift bricks, green roofs/green walls, and/or additional tree planting where appropriate and which could be secured through the imposition of suitably worded planning conditions.

Protected Species

The application is also supported by an Ecological Impact Assessment which has been reviewed by the Council's Ecologist who raises concerns about the validity of some of the surveys that were carried out in 2023, in partial with regard to reptiles.

The proposed reptile mitigation is based on sensitive habitat clearance (i.e. reptiles moving to a safe refuge location outside of the working area). However, there appears to be insufficient habitat retained for the reptile population on site, nor any habitat that could be managed in a sensitive way for reptiles due to their anticipated use. Therefore, it is not clear where the existing population could be relocated to. In summary, given the lack of updating survey work and as the mitigation strategy is not considered appropriate, the Council's Ecologist is not satisfied that the proposals will not have an adverse impact on the reptile population on site.

Due to the loss of the majority of habitats on site and introduction of additional lighting, the Council's Ecologist raises concern that no bat activity surveys have been carried out to date. It is not clear how a mitigation strategy can be designed for foraging and commuting bats (e.g. soft landscaping plans and a sensitive lighting strategy) in the absence of any survey work. Retention of the hedge along part of the southern boundary alone, as stated in the submitted report, is not considered acceptable justification for lack of any survey work whilst the grassland will be removed, there will be a change in the landscape and due to the nature and use of the site there will be limitations in providing dark corridors. Incidental observations during emergence surveys covering buildings in a different part of the site, particularly that these surveys are 3 years old, is not acceptable and does not provide the minimum information required into the level of bat usage and species composition on site. Deployment of statics and seasonal walked transects in line with good practice guidelines should be carried out, as the submitted report confirms 'moderate' suitability for foraging and commuting bats. Given the lack of any survey work and lack of a mitigation strategy (e.g. final lighting plan and soft landscaping plans), the Council's Ecologist is not satisfied that the proposals will not have an adverse impact on the local bat population

The Council's Ecologist also raises concern in regard to how the conclusion of negligible potential for notable invertebrates has been reached, given its coastal location, presence of records for notable invertebrates and lack of any survey work.

The appointed person who will determine the application will need to satisfy themselves that the impact of the proposals on protected species (in particular reptiles and bats) has been properly considered and that any mitigation is appropriate.

Highways & Parking

Hampshire County Council in their role as the Local Highway Authority (LHA) will need to be satisfied that the significant intensification of the site will not have a detrimental impact on the local highway network and be compatible with the objectives of the Local Transport Plan 4. The LHA, amongst other matters, will also need to consider highway safety, access (and an assessment of on-street parking restrictions), and the suitability of the Travel Plan.

The proposed development would increase the number of bed-spaces at the site from 130 ("existing" IRC, opening 2027) by 470 bed to a total of 600 beds, with a corresponding increase in staff from 148 to 265 (414 in total), giving rise to a total of 774 average daily vehicle movements (figures here taken from the Planning Statement at Para 3.5, pages 7 and 8).

The Transport Assessment (TA) and accompanying Travel Plan (TP) that support the application have been heavily redacted, and as such limit any ability to assess the application. An unredacted version of the TA has belatedly been provided to the LPA and further specific comments in regard to that document and this issue will be provided separately.

Nevertheless it is clear that the site is currently poorly served by public transport – with just the No.11 bus serving Gilkicker/Clayhall Roads, which has a very short service day with only 4 services per day and it is unlikely that this will be an attractive form of access to the site. The Bus Station and Gosport Ferry are nearby, and could offer opportunities for multi modal trips, with the TA detailing the site is within a 7 minute cycle and 30 minute walk from the Interchange area.

Visitor trips appear to be minimal and the TA details that all such trips will be facilitated by means of a mini-bus to/from the Gosport Ferry/Bus Station (numbers of visitors has been redacted). However, there is conflicting information in the Planning Statement (para 3.16), which details that there are dedicated parking spaces for visitors, with an expected number of visitors between 10-15 persons.

The primary access to the site is to be retained from Dolphin Way, however, proposed parking along this road will restrict this to single file traffic, with limited forward visibility. However, it is noted in the TA and TP that parking already takes place on Dolphin Way, and it is detailed that it is intended to erect signage to indicate that vehicles travelling to the site from Fort Road will have priority to reduce the risk of vehicles queuing back onto the Public Highway, with the LHA needing to be satisfied that this is a suitable mitigation.

The existing secondary access adjacent to no 13 Fort Road is identified to be retained as a "blue light" only access, the LHA will need to comment on this aspect of the access arrangements, including intervisibility for vehicles exiting the site.

Access to the new car park is to be as current arrangements from Military Road (which is a short access road taking access from Fort Road). The new car park will increase parking availability from 85-93 spaces (including 35-43 spaces on Dolphin Way) to 295-302 spaces (including 35-43 spaces on Dolphin Way). The TA notes that assumptions have been made on parking demands and para 4.4.6 appears to suggest that there is a demand for 80% of spaces, however, the number of spaces is redacted, therefore a full understanding is not possible. It is noted that 20 spaces are retained for public use outside the secure parking areas as per the requirements of the sale of the land by the Council.

For the new car park a layout plan is provided – whilst the spaces appear to be provided at 2.5m wide, end spaces do not appear to comply with the adopted Parking SPD and should be increased in width to 2.8m. The determining authority must also be satisfied that there are suitable provisions for disabled parking and also EV charging too (to meet both current requirements and also adequate enabling infrastructure for increased demands in the future).

In line with the requirements of the NPPF and other local policy documents, a Travel Plan has been submitted, the LHA will need to comment on the suitability of this document and any actions arising to reduce the reliance on the private car / increase access to the site by sustainable transport modes (the 5 year target being a reduction from 80% to 70% of trips being by driving a car/van, with an increase in alternative modes from 20% to 30%).

In relation to the accessibility of the site it is acknowledged in the submitted documents that access to the site by non-car modes is only likely to form a small proportion of the modal share. It is considered that there are improvements that could be made through investment in sustainable modes and infrastructure to reduce the reliance on the private car. The LHA should consider whether contributions should be sought to mitigate the impacts of the proposed development and facilitate improvements to walking and cycling infrastructure in the vicinity of the site. There may also be scope, through financial contributions, to make improvements to the local bus service to increase both the service frequency and the length of the operation day to make this a more attractive option for travel to / from the site.

The TP (Table 5.1) indicates that it is expected that 80% of those travelling to the site will do so by driving a car/van, with the remaining 20% travelling to the site by alternative modes (including 5% as a car/van passenger). The determining authority will need to be satisfied

that there is sufficient on-site parking capacity to accommodate the likely parking demands (including shift change over times) so as not to have a detrimental impact on the surrounding highway network, highway safety and the amenity of nearby residents. If overspill parking as a result of the proposed development were to occur this would be unacceptable and all parking demands must be met on site, as per the requirements of the adopted Parking SPD.

The Planning Statement details 26 spaces near new car park and 18 spaces close to the Dolphin Way entrance). The provision of cycle parking should be of the highest quality (secure, covered, easily accessible and convenient to use) in order to promote cycling as an attractive alternative to driving to the site.

Policy LP23 of the Gosport Borough Local Plan requires that provision is made for parking cars, motorcycles and bicycles and that access and parking for people with disabilities is provided in accordance with current standards – the determining authority must be satisfied that the requirements of Policy LP23 are met.

The highway network in the immediate vicinity of the site is relatively lightly and locally trafficked (being a peninsula on a peninsula), which means that the significant intensification of the use of the site and resultant increase in vehicular movements will be noticeable against such a background. The decision maker for this application will therefore need to be satisfied that the resultant increase in traffic will not have a significant effect on local roads and junction capacity, and also consider impacts further afield on roads and junctions likely to be used by site traffic which are more heavily trafficked and are known to have existing and long-standing capacity constraints.

Rights of Way

The application makes reference to the 'realignment and improvements to the England Coastal Path through the site'. This is likely to need the approval of Hampshire County Council as Rights of Way Authority and Natural England as the responsible body for the England Coastal Path.

Given that the route of the Solent Way follows Fort Road landward of the site whereas the England Coastal Path runs across the car park, seaward of the site and returns along Dolphin Way, there appears to be an opportunity to enhance public routes around the site, especially with regard to improving connectivity through to the former Royal Hospital Haslar where public access through that site and to the Solent frontage has been secured and provided.

Flooding

The application is accompanied by a Flood Risk Assessment, Coastal Modelling Report, and Flood Evacuation Management Plan. These documents confirm that the proposals relate to a more vulnerable use which is located in Flood Zone 3 therefore requires the Exception test to be passed. The FRA also identifies the need for mitigation measures including raised floor levels of up to 1.27 metres above current ground levels

The decision maker will need to ensure that the views of the Environmental Agency and Hampshire County Council as Lead Local Flood Authority are sought and their expert views taken account of. The decision maker will also need to ensure that the proposed development could be operated with minimal risk from flooding, would not increase flood risk elsewhere and is compliant with the requirements of national policy and guidance relating to flooding.

Other Matters

Pollution

The application is accompanied by an indicative Lighting Assessment, a Noise Assessment and an Air Quality Assessment all of which have been reviewed by the Head of the Environmental Health Partnership. The conclusions of each document that the proposals should not result in harmful impacts are agreed subject to the relevant mitigation measures being secured through the imposition of suitably worded planning conditions.

Contamination

The supporting information relating to this issue which have been reviewed by the Head of the Environmental Health Partnership. The conclusions that the proposals should not result in harmful impacts are agreed subject to the relevant mitigation measures being secured through the imposition of suitably worded planning conditions.

Employment & Skills

The Planning Statement confirms that “it is anticipated that the construction phase will create 491 additional construction jobs” and that “this employment boost has the potential to provide opportunity to local people who are currently unemployed or with poor labour market contributions, as well as through apprenticeship opportunities providing wider social value in the area”. The Planning Statement also states that “a further 364 net additional jobs are anticipated as a result of the construction of the proposed development”

In regard to the future operation of an expanded IRC the Planning Statement advises that “it is anticipated approximately 265 net additional jobs could be generated across the operational phase [when] the development is completed” and that “this employment level has the potential to provide opportunity to local people who are currently unemployed or with poor labour market contributions”.

Policy LP17 of the Local Plan relates to skills with the development exceeding the thresholds for measures to secure local employment and training relating to both the construction and operational phases of the development. The Planning Statement confirms that the applicant is agreeable to providing opportunities for local employment and training as part of the development. This can be secured through the imposition of a suitably worded planning condition. Notwithstanding this, we are aware that discussions have been initiated with representatives of the local job centre in regard to the phase 1 reopening of the IRC.

Conclusion

Whilst the proposed expansion of the IRC may be considered acceptable in principle, for the reasons set out above, there are a number of material issues where the available information does not provide sufficient detail for a properly informed planning judgement to be made. The consideration of some of these issues involve legal duties that the person appointed to determine this application will need to have due regard to.

Notwithstanding the indicative character of some of the drawings and the Outline nature of the application, the scale and siting of the indicative proposals give rise to significant concerns about the harmful impact of the proposals on the Haslar Barracks Conservation Area and the setting of the designated historic assets at the former Royal Hospital Haslar.

The proposals have the potential to adversely affect protected species known to use the site. Whilst mitigation measures have been set out in the supporting documents in relation to some of these, in other instances the survey and other work undertaken are not considered appropriate to enable a robust judgment to be made as to the potential impact or the effectiveness of proposed mitigation.

The likely level of traffic generated by the expansion of the IRC has the potential to affect the function of the local road network such that it could have an impact on the capacity of junctions in the wider area. Detailed comments in this regard will be provided by Hampshire County Council as Local Highway Authority.

Yours faithfully

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Head of Development Management

Appendix – report to Regulatory Board regarding LPA response to consultation

Appendix – schedule of suggested conditions