DAME CAROLINE DINENAGE DBE MP

HOUSE OF COMMONS
LONDON SW1A 0AA

Planning Inspectorate
c/o QUADIENT
69 Buckingham Avenue
Slough
SL1 4PN

Your ref: CROWN/2026/0000005
My ref: CD61941
30th July 2026

Dear Sir/Madam,

I am writing to object to Crown Development Application CROWN/2026/0000005 concerning the proposed expansion of Haslar Immigration Removal Centre.

Before setting out my objections, I must express my profound disappointment at the way in which Home Office Ministers and Officials have conducted engagement with residents and elected representatives. The three-storey buildings now included within this application were not included in the plans originally presented to residents, despite their height, scale and appearance being among the most significant aspects of the development. At the first engagement event in January 2023 residents were told that the height of any future buildings would be no taller than the existing site, which contains one two storey structure. This inaccuracy from the earlier engagement has left residents feeling that they were not given an accurate or transparent account of what is being proposed.

More generally, engagement by Ministers, both with residents and with me as the local Member of Parliament, has been deeply disappointing. Minister Norris agreed to meet with me in the Chamber but subsequently cancelled the meeting, while residents have already experienced an array of issues arising from the construction of the first phase which have not been addressed adequately. Communication between the Home Office and local residents has been infrequent and suboptimal.

I recognise that the Crown Development route is now available to the Government. However, this application is among the first of the very small number to be determined through this exceptional procedure, under which responsibility for determining the application has been removed from the local planning authority. I disagree with the use of this procedure and have repeatedly called for the proposal to be submitted to Gosport Borough Council through the usual planning process.

Given the substantial local interest in the application, the shortcomings in the previous engagement and the extent to which important documents and drawings have been withheld or heavily redacted, I ask that the application be determined following a full public inquiry rather than solely through written representations. A public inquiry would allow

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residents and elected representatives to test the applicant's evidence, ask questions and make meaningful representations about matters which cannot properly be examined using the limited information currently available. It would also provide the Home Office with an opportunity to answer publicly for the assumptions and conclusions contained within its application.

In addition to my concerns about the Crown Development process, I consider that the proposal conflicts with the overall development strategy set out in the emerging Gosport Borough Local Plan 2042. Policy D2 identifies five Regeneration Areas which are intended to play a central role in meeting the Borough's future development needs, and the Haslar Peninsula is arguably one of the most important of these areas.

A number of major regeneration projects within the peninsula are already progressing or expected to progress shortly. These include Fort Blockhouse, which is currently occupied by the Ministry of Defence but is expected to be released for heritage-led mixed-use redevelopment; Royal Hospital Haslar, where development is already underway, sections of the site are occupied and further phases have planning permission; the Haslar Gunboat Sheds, where planning permission has been granted and work has commenced; the former QinetiQ site, where development proposals are progressing; and the Piggeries, where planning permission has been granted for 58 homes.

Once completed, Royal Hospital Haslar alone is expected to accommodate approximately 1,200 residents, together with a hotel, care facilities and other uses. The Local Plan also recognises that the Haslar Peninsula contains nationally significant heritage assets, occupies an attractive coastal setting and presents a major opportunity for the regeneration of Gosport. It identifies the potential to create a significant new waterfront neighbourhood and connect these developments with the Waterfront Trail, the Heritage Action Zone and the wider historic waterfront.

Although the application site lies adjacent to, rather than formally within, the identified Haslar Peninsula Regeneration Area, the scale and nature of the proposed development would have direct implications for its successful delivery. The proposal would introduce a significantly intensified, heavily secured institutional development accommodating up to 600 detained people into the centre of this emerging waterfront neighbourhood. Its height, scale, utilitarian appearance, security infrastructure, operational activity and transport demands are incompatible with the accessible residential, employment, leisure, tourism and heritage-led environment which the Local Plan is seeking to create.

The Inspector should consider whether this particular scale and intensity of development would compromise the Council's wider strategy for the Haslar Peninsula. Gosport Borough Council's report acknowledges that the proposed scale of the IRC has significant potential to detract from the regeneration objectives for Royal Hospital Haslar and Fort Blockhouse, and this concern should be given substantial weight.

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The application does not demonstrate that the expansion would avoid prejudicing the accessibility, attractiveness, connectivity, viability and successful delivery of these strategically important regeneration projects. For these reasons, I consider that the proposal conflicts with Policy D2 and the overall strategy of the emerging Gosport Borough Local Plan.

Changes following public engagement

The proposal now before the Inspector differs from the scheme originally presented to residents. The capacity and intensity of the second phase are considerably greater than residents were originally led to expect, with accommodation blocks of up to three storeys alongside extensive dining, medical, leisure, care, separation and operational facilities.

Residents were also originally given the clear impression that the centre would principally accommodate male detainees awaiting removal from the United Kingdom. The Home Office's own national statistics now show that immigration bail is the most common reason for people leaving detention. In addition, the Indicative Lighting Assessment appears to have been prepared with reference to standards associated with a Category C prison, raising questions about whether elements of the development have been designed to facilitate a materially different use in the future.

Taken together, these changes demonstrate that residents were not originally shown an accurate or complete picture of the scale, operation and possible future use of the development now being proposed.

Loss of housing opportunity

The loss of the opportunity to deliver housing on this site must also be given particular weight. During the preparation of the Council's Local Plan, the Ministry of Justice promoted the IRC site for residential development and it was subsequently proposed for approximately 225 homes under the Regulation 18 draft Local Plan.

The Council worked with the site promoter to develop a sensitive, heritage-led residential proposal. That work indicated that the site was one of the most viable housing opportunities within the Borough and was capable of delivering 40% affordable housing, together with a substantial Community Infrastructure Levy contribution. The Ministry of Justice withdrew the site from the Local Plan process in July 2022, meaning that the proposed housing allocation was removed from the subsequent Regulation 19 Local Plan.

That decision has affected Gosport's ability to meet its housing needs. Gosport Borough Council cannot currently demonstrate a five-year housing supply and is subject to increasing pressure under the Government's Housing Delivery Test. The Borough has a tightly

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constrained land supply and very limited opportunities to identify large, viable sites capable of delivering a substantial proportion of affordable housing.

The Government is now proposing a major intensification of institutional use on land which it had previously promoted for approximately 225 homes, including around 40% affordable housing. While the former housing allocation is no longer contained within the emerging Local Plan, the permanent loss of such a substantial and viable housing opportunity remains highly relevant to the wider planning balance and the future regeneration of the peninsula.

The Home Office should therefore be required to demonstrate why this constrained coastal site is the most appropriate national location for a 600-place immigration removal centre when its development prevents the delivery of much-needed housing in a Borough which cannot meet its identified housing requirements.

Heritage, scale and design

The Haslar Peninsula contains a concentration of nationally important heritage assets. The application site is immediately adjacent to the Haslar Barracks Conservation Area and close to the Stokes Bay and Haslar Peninsula Conservation Areas. It is also near Fort Monckton and the nationally important listed buildings and registered park at Royal Hospital Haslar.

The adopted and emerging Local Plans require development affecting these assets to preserve or enhance their character, appearance and setting. This proposal singularly fails to achieve that objective. It includes four three-storey accommodation blocks of up to 12 metres in height, two of which would be situated approximately 24 metres from the predominantly single-storey historic barracks buildings.

This relationship would be overbearing and harmful to the setting of the Haslar Barracks Conservation Area. The proposed buildings would be substantially taller than both the historic barracks and the surrounding two-storey residential development, while the need to raise floor levels because of flood risk would cause them to appear even taller.

The Council's pre-application concerns about the height, scale, proximity and design of the buildings do not appear to have been resolved. The application appears to have responded only by moving the buildings approximately four metres further from the Conservation Area boundary. The indicative elevations continue to show large, stark and utilitarian buildings which lack architectural merit and fail to respond appropriately to their sensitive historic setting. The dining and Care and Separation Unit buildings are also described as single-storey, despite the indicative plans appearing to show first-floor accommodation.

Although detailed design is reserved for later consideration, the applicant must demonstrate at outline stage that the amount of development proposed can be accommodated acceptably. The indicative plans fail to demonstrate that a development of

this size and capacity can be delivered without significant harm to the historic environment. Landscaping and screening may soften some views, but they cannot remove the harm caused by the scale, massing and proximity of the buildings, nor should planting be treated as a substitute for appropriately designed development.

The proposal would also restrict opportunities to improve public appreciation of the peninsula's heritage and to create stronger connections between the coastal path, Royal Hospital Haslar and the future redevelopment of Fort Blockhouse.

Transport Assessment

The published Transport Assessment does not demonstrate that the existing and foreseeable development surrounding the site has been assessed adequately.

Royal Hospital Haslar is already being redeveloped and is expected to accommodate approximately 1,200 residents, together with a hotel, care facilities and other uses. Fort Blockhouse is also expected to be released for heritage-led mixed-use development, while other approved and proposed developments across the peninsula will generate further traffic.

However, the published assessment does not clearly identify how the existing and projected movements from these developments have been included in its modelling. This is particularly concerning because access to the Haslar Peninsula is already constrained and the IRC expansion itself could generate approximately 774 average daily vehicle movements.

The application therefore does not demonstrate that Fort Road and the wider Gosport highway network can accommodate the cumulative traffic from the IRC, Royal Hospital Haslar, Fort Blockhouse and the other planned developments.

The Transport Assessment also appears to rely on a future bus service for which no operator, funding or timetable has been identified. The proposal should therefore be assessed using the public transport services which currently exist, unless improvements are secured through an enforceable planning obligation.

The extensive redaction of the Transport Assessment and Travel Plan prevents residents and consultees from properly testing assumptions about traffic growth, staff journeys, visitor numbers, parking and emergency access.

Ecology and protected species

The application site is environmentally sensitive and is located close to several nationally and internationally protected habitats. It is identified as a core area used by overwintering birds and lies adjacent to the Solent and Dorset Coast Special Protection Area. It is also close

to Portsmouth Harbour Special Protection Area and Ramsar site, the Solent Maritime Special Area of Conservation and several locally designated nature conservation sites.

The Council's Ecologist has raised significant concerns about the adequacy and age of the ecological evidence submitted with the application. Some surveys were undertaken in 2023 and have not been updated, while the proposed mitigation for reptiles does not identify sufficient suitable retained habitat or explain where the existing reptile population could be relocated.

No appropriate bat activity surveys have been carried out, despite the loss of grassland, the introduction of additional lighting and the site being assessed as having moderate suitability for foraging and commuting bats. There is also insufficient evidence to support the conclusion that the site has negligible potential for notable invertebrates.

The applicant has therefore failed to provide the up-to-date survey evidence necessary to establish the likely effect on protected species or demonstrate that effective mitigation can be delivered.

Flood risk

A significant proportion of the site is located within Flood Zones 2 and 3, and the extent of the areas at risk of flooding is expected to increase over time. The proposed development is classified as a more vulnerable use and must satisfy the relevant planning tests for development in an area at significant risk of flooding.

The submitted Flood Risk Assessment identifies the need to raise floor levels by as much as 1.27 metres above existing ground level. This has implications both for flood safety and for the apparent height and visual impact of the proposed buildings.

The Inspector must be satisfied that the development can operate safely throughout its lifetime, that appropriate emergency and evacuation arrangements can be provided and that the proposal would not increase flood risk elsewhere. Given that the site would accommodate up to 600 detained people who would not be free to evacuate independently, the robustness and practicability of the Flood Evacuation Management Plan require especially careful scrutiny.

Pressure on local health services

The application repeatedly refers to a Health Needs Assessment, but that assessment has not been published for public examination. The available documents acknowledge that detained people will require access to routine outpatient services and emergency hospital treatment outside the site, which will be provided through local NHS organisations already used by Gosport residents.

As the Member of Parliament for a small coastal constituency, I regularly hear concerns about access to primary care, hospital appointments, ambulances and other health services. Our local Primary Care services already face difficulties recruiting General Practitioners. A facility accommodating up to 600 people would create additional and continuing demand.

There is also an apparent contradiction within the Planning Statement. Paragraph 6.99 states that emergency care will be routed to local hospitals only in exceptional circumstances and that comprehensive on-site care will minimise pressure on local NHS services. However, paragraph 3.25 states that the unpublished Health Needs Assessment has identified that 4.1% of detained people will require treatment at local hospitals.

As the facility cannot provide emergency hospital care, some level of off-site treatment is plainly foreseeable and should not be presented as wholly exceptional. The effect on ambulance services is also concerning, as Gosport does not have its own ambulance station and the site is located at the southern end of a peninsula with limited access routes.

Noise and disturbance

The Planning Statement confirms that detained people may arrive at or leave the facility at any time of the day or night, with the same applying to individuals released on immigration bail. The application does not adequately assess the potential effect on nearby residents of vehicle movements, engines, doors, security activity, lighting, staff movements and other operational noise during night-time and early-morning hours.

The possibility of increased movements during significant enforcement operations, including the occasional use of coaches, makes this more than an incidental concern. A facility operating continuously and receiving arrivals throughout the night could cause material disturbance, particularly given the proximity of existing and planned homes.

Operational turnover

Residents were originally given the impression that those accommodated at the centre would principally be awaiting removal from the United Kingdom. The Home Office's own statistics now demonstrate that this does not accurately describe how immigration detention operates.

Home Office statistics for the ending September 2025 show that 98% of people leaving detention had been detained for less than six months, 67% for one month or less and 27% for seven days or less. Immigration bail accounted for 52% of departures, while removal from the United Kingdom accounted for 43%.

Assuming, solely to illustrate the possible scale, an average detention period of approximately 48 days based on the aforementioned statistics and full occupation of all 600 places, the centre could accommodate approximately 4,560 individual detention periods

each year. Applying the national proportion leaving on immigration bail would suggest that approximately 2,370 releases on bail could occur annually.

The Planning Statement indicates that detained people will leave the site by vehicle, but it is unclear whether this commitment extends to people released on immigration bail and, if so, where they would be taken. Transporting someone to Gosport Ferry, a railway station or another public transport interchange would not necessarily remove that individual from the local area.

The Home Office has provided no clear explanation of how releases will be managed, particularly those occurring at night, what arrangements will apply where suitable accommodation is not immediately available or what support will be provided to vulnerable individuals. It is not suggested that every person released on immigration bail would remain in Gosport. However, without a clear and enforceable onward-transport and accommodation plan, an unknown number could remain temporarily in the area or seek assistance from local services.

This is particularly concerning given Gosport's constrained housing supply, the pressure on temporary accommodation and the existing levels of deprivation within parts of the Borough. These are foreseeable operational consequences of a large, high-turnover detention facility and should have been assessed properly.

Future Use

The Indicative Lighting Assessment appears to have been prepared using guidance and security standards associated with a Category C prison, with the stated justification that the operational use of the site could change in the future, however, no assessment has been provided of the consequences of operating the site as a Category C prison.

A prison could give rise to materially different operational requirements and impacts, including different staffing levels, visitor movements, transport demands, security arrangements, lighting, noise, servicing and effects on the surrounding community. None of these potential impacts has been assessed as part of the present application.

If the development has been designed deliberately to facilitate a future prison use, that possibility should be taken into account when assessing whether the scale, form and infrastructure of the current proposal are acceptable.

For the reasons set out above, I object to Crown Development Application CROWN/2026/0000005.

The proposal represents a substantial intensification of the site's existing use and has not been shown to be compatible with its sensitive heritage, environmental and coastal context. Its scale and operational characteristics could risk substantially compromising the

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regeneration of the Haslar Peninsula and the creation of a significant new waterfront neighbourhood at Royal Hospital Haslar and Fort Blockhouse.

It would also permanently remove the opportunity to deliver approximately 225 homes, including a substantial proportion of affordable housing, at a time when Gosport cannot demonstrate a five-year housing supply. The height, massing and utilitarian design of the proposed buildings would cause harm to the Haslar Barracks Conservation Area and the setting of nationally important heritage assets at Royal Hospital Haslar.

The applicant has not provided adequate and up-to-date evidence concerning cumulative transport effects, protected species, healthcare demand, night-time operations, immigration-bail releases or the possible future use of the site. The extensive redaction of drawings and supporting documents makes a thorough and transparent assessment of these issues exceptionally difficult.

I therefore ask that planning permission be refused.

Yours sincerely,

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