

Leigh Day

FAO: Mr Phil Hammond, The Planning Inspectorate

Room 3 O/P
Temple Quay House
2 The Square
Temple Quay
Bristol
BS1 6PN

Direct Dial: 020 7650 1240

Email: rowans@leighday.co.uk;
adews@leighday.co.uk

Your Ref:

Our Ref: RWS/ADS/00195130/1

Date: 4 April 2019

First by email: enquiries@pins.gsi.gov.uk

18 APR 2019

Dear Mr Hammond,

Re: New detention centre and Heathrow Airport expansion

1. We are instructed by End Heathrow Immigration Detention (the "Group"), which is a group of local residents and campaigners opposed to the building of a new detention centre as part of any Heathrow Airport expansion.
2. We are aware from a copy of a meeting note (enclosed for ease of reference) (the "Note") that representatives from the Planning Inspectorate ("PI") met with representatives from the Home Office ("HO") on 21 June 2017. In the meeting, HO explained that Heathrow Airport Ltd's ("HAL") plans for expansion would require the demolition and subsequent replacement of the Heathrow Immigration Removal Centre ("IRC") (which covers both Harmondsworth and Colnbrook sites).
3. The Note records HO as accepting that there is a national need for the proposed development, but stating that appropriate replacement facilities must be secured. The Note goes on to state that, whereas it is both HO's and HAL's "strong preference" for any new centre to be included in HAL's development consent order ("DCO") application, there is still an alternative option for an application for planning permission to be made under the Town and Country Planning Act 1990 (the "1990 Act").
4. We understand from the Note that PI advised the HO on how HO "could most effectively engage" if the new centre forms part of the DCO application. We also understand that the PI advised the HO about the potential for "closed hearings" at any DCO inquiry.
5. The Note records that the meeting concluded with the PI and HOM agreeing to have a follow-up meeting when site selections had been narrowed.

Leigh Day postbox@leighday.co.uk - www.leighday.co.uk

Priory House, 25 St John's Lane, London EC1M 4LB

T0207 650 1200 - F0207 253 4433

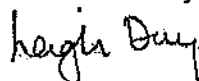
DX 53326 Clerkenwell

Central Park, Northampton Road, Manchester M40 5BP

T 0161 393 3600 - F 0207 253 4433

6. Given the Group's concerns, please provide the following information within 14 days of the date of this letter in accordance with the PI's Code of Conduct (June 2017):
 - 6.1. Details of any previous or subsequent meetings between PI and the HO on this issue, including: time, date, attendance list and copies of any meeting notes;
 - 6.2. Explanation of why it is HO's preference that any new centre is included in HAL's DCO application, how that preference has been arrived and why that option is preferred to an application for planning permission under the 1990 Act;
 - 6.3. Explanation of why it is HAL's preference that any new centre is included in HAL's DCO application, how that preference has been arrived at and why that option is preferred to an application for planning permission under the 1990 Act.
 - 6.4. Explanation of what role HO and PI will play in HAL selecting that preference as the way forward;
 - 6.5. Details of how and when the selection of that preference as the way forward will be subject to public consultation;
 - 6.6. Confirmation that neither the HO nor HAL has made a final decision in respect of their preference;
 - 6.7. Details of what further steps the HO and/or HAL have taken in exploring the option of an application for planning permission under the 1990 Act, and confirmation of whether or not that option will be the subject of a public consultation;
 - 6.8. Clarification that it is not HO's view that there is not a national need for the proposed development of a new detention centre rather a national need for the proposed development of a third runway;
 - 6.9. Clarification of what the PI meant by its advice to HO on effective engagement if the preference is selected as the way forward;
 - 6.10. Clarification of what the purpose was of the HO asking for PI's advice about "closed hearings", including whether the PI's advice was more detailed than that recorded in the Note and, if so, copies of that more detailed advice; and
 - 6.11. Confirmation as to whether the site has been selected yet or not.
7. Please note that this letter has been copied to HO and HAL.
8. Please send your response to both Rowan Smith and Anna Dews (solicitors) using the contact details in our letterhead.

Yours faithfully,


Leigh Day

Leigh Day postbox@leighday.co.uk - www.leighday.co.uk

Priority House, 25 St John's Lane, London EC1M 4LB

T 0207 650 1200 - F 0207 253 4433

DX 53326 Clerkenwell

Central Park, Northampton Road, Manchester M40 5BP

T 0161 393 3600 - F 0207 253 4433