

Broadland District Council

Planning Department

Thorpe Lodge

1 Yarmouth Road

Norwich NR7 0DU

Sent by email to: planning@broadland.gov.uk

18 February 2022

To whom it may concern,

Re: Planning application 20212324/Jaguar Buildings-Badersfield

We are writing to object to the above planning application.

The Helen Bamber Foundation

The Helen Bamber Foundation ('HBF') is an expert clinical and human rights charity that works with survivors of trafficking, torture and other forms of extreme cruelty and believes that all survivors should have safety, freedom and power. Our work alongside survivors shows us that with early and appropriate care and support they build the strength to move on with their lives. Our multidisciplinary and clinical team provides a bespoke Model of Integrated Care for survivors which includes medico-legal documentation of physical and psychological injuries, specialist programmes of therapeutic care, a medical advisory service, a counter-trafficking programme, housing and welfare advice, legal protection advice and community integration activities and services.

HBF has worked directly with people placed in the accommodation centres created by the Home Office in former military sites and with those held in immigration detention. As well as the contents of this letter we would recommend reading the detailed response we submitted last month to the planning application for a different accommodation centre (the Napier site in Kent): <https://www.helenbamber.org/resources/reportsbriefings/response-napier-barracks-planning-application-consultation>. Much of the content of that response is relevant to the Jaguar Buildings planned site use, in particular please see pages 4-9 regarding the impact on the health of residents, who are placed in institutional accommodation of this kind.

In considering this planning application it may also be useful to cross-reference:

- The All-Party Parliamentary Group on Immigration Detention's December 2021 report into 'Quasi-Detention' looking at these institutional asylum accommodation sites: <https://appgdetention.org.uk/inquiry-into-quasi-detention/>;

- The Chief Inspector of Borders and Immigration and HMIP inspection July 2021 of the Penally and Napier sites (run by Home Office contractors on an equivalent model): <https://www.gov.uk/government/publications/an-inspection-of-contingency-asylum-accommodation-hmip-report-on-penally-camp-and-napier-barracks>;
- The High Court judgment in *NB* [2021] EWHC 1489 (Admin), which is about the Napier site particularly, but includes details of the Home Office's leadership failures in setting up these 'emergency' sites: <https://www.bailii.org/ew/cases/EWHC/Admin/2021/1489.html>
- The British Red Cross's 2021 report 'Far from a Home', which includes details of their work in the Penally Camp (p.25) and the relevance of asylum housing being integrated with community (p.29): <https://www.redcross.org.uk/-/media/documents/about-us/what-we-do/far-from-a-home.pdf>

Having read the planning documents in detail, we are concerned that this accommodation is inherently unsuitable for people seeking asylum, who are a particularly vulnerable population, in light of the following features:

- The use of a semi-closed, fenced environment, with limited freedom of movement;
- Shared facilities and lack of privacy; and
- Isolation from communities and the inability of residents to access services, including healthcare and legal advice, and activities as they would in the community.

Although the site is intended to be used as an Initial Accommodation Centre for 28 days, the experience of people seeking asylum housed in other forms of initial accommodation is that they are likely to be housed there for much longer than that. This makes the concerns outlined above even more relevant and likely to have a severe impact on the morale of people staying on the site. Residents previously protested their accommodation on this site, as per the planning letter from Superintendent Kris Barnard dated 30 November 2021. At similar sites at Penally in Wales and Napier in Kent these protests have continued and at Napier residents reported exceptionally high levels of distress and then there was eventually a serious fire. The Home Office does not put in place proper residents' fora or other democratic or organising channels in Home Office accommodation.

Impact on the community

The planning consultation suggests that, in line with the Joint Core Strategy (JCS) for Broadland, Norwich and South Norfolk, development should 'promote equality and diversity', that housing people seeking asylum in Jaguar House "will broaden the social cohesiveness of the area". However, this kind of segregated, institutional asylum housing – mass accommodation in a rural area – harms community cohesion and compliance with the Public Sector Equality Duty. HBF has seen this at Penally Camp in Wales and Napier Barracks in Kent. This issue – as we understand it – was one of the reasons that the Jaguar Buildings site stopped being used (this adverse impact on the community is highlighted in Jerome Mayhew MP's planning response letter of 25 January 2022). In our experience of these sites there are few opportunities for safe and wholesome engagement with local communities (save for where local residents go far out of their way to set up entire community programmes).

The ethnic make-up of this host community in this rural setting is not representative of the ethnic make-up of camp residents, meaning residents will be readily identifiable in the streets. We can see from the planning letter dated 30 November 2021 from Superintendent Kris Barnard, and the responses of residents to the planning consultation to date, that local residents have said they felt so scared and intimidated that they did not want to leave their homes when the site was last open. This experience can be similar for residents of the site too. For example, oral evidence given to the All-Party Parliamentary Group for Immigration Detention by JRS on 8 February 2022 was that men on this kind of site themselves 'self-detain' for a significant amount of time, because they're uncomfortable going out. Former military sites have repeatedly been targets for racially motivated hate crime perpetrators to attend and if the use of this site is extended there is a real risk that it could become a target for such antisocial far right protest.

Access to health services

The Home Office has a policy which is supposed to identify certain groups of people (such as torture and modern slavery survivors) and not place them into former military accommodation centres. It is unclear whether this policy would even cover the Jaguar Buildings site, but even if it did, the High Court has found that the policy is not operated lawfully or effectively: *NB* [2021] EWHC 1489 (Admin).

In light of this, Jaguar House will almost certainly be used to house people with extremely severe trauma histories, including backgrounds of grave mistreatment, bereavement and loss. The planning documents make very minimal reference to access to healthcare for residents, saying only that "arrangements will be made by the Clinical Care Commissioning Group and Healthwatch England" and referring to "NHS Walk-In services such as the Walk-In Centre [in] Norwich". There is no plan for providing proper trauma-informed care to people moved onto the site, such as the arrangement of mental and other health assessments from a clinician trained in refugee health or the provision of ongoing mental health support. Some of the people moved onto the site will be recent survivors of rape, of torture and other human rights abuses and there will be a vital need for specialist care and services that simply will not be available. We understand that the local police received five calls regarding the suicidality of residents during the last period when Jaguar Buildings was open (planning letter from Superintendent Kris Barnard, 30 November 2022), which is consistent with HBF's experience working with residents of this kind of institutional accommodation.

People seeking asylum should have the same access to mainstream NHS services as any other member of the community. There are many strong reasons (both for individual healthcare outcomes and public health) why mainstream, full registration with a local GP is necessary. It is not clear that local NHS services would have the capacity and specialism to meet the needs of this population, who would then not have access to adequate healthcare.

Access to support and other services

The Jaguar Buildings are located in a small village with no services other than one shop. It is an hour's walk from the next village. Residents would have access to very few activities to occupy their time but will also have access to very little financial support that would allow them to travel to engage with support and community opportunities elsewhere. The consultation document makes clear that residents "will arrive at and depart from the IAC in supported transport and will not be travelling to or from the facility individually", allegedly allowing for "full control over overall movements to and from the site".

Isolated accommodation of this sort does not recognise the needs of this group. People seeking asylum housed by the Home Office can be vulnerable to further exploitation and abuse. As a population they often need access to specialist services (rape crisis, HIV, LGBTQ+, modern slavery services and so forth) and rely very heavily on community and charitable services. (food and clothes banks, destitution grants, drop-ins, again often provided by specialist organisations like the British Red Cross, as per their report above). These are not available in the local area. It is also important that people can access their own religious communities and right to worship their religion, particularly when many people fleeing asylum have already had to flee religious persecution. Many people who seek asylum in the UK will also do so because they have relatives here and so institutional accommodation in a remote setting with long and expensive journey times sabotages family emotional support.

Access to quality legal advice

It is extremely important in the UK's system that people seeking asylum have legal representation. However as far as we are aware the Jaguar Buildings are not in an area with adequate legal aid contract providers to meet this need – the nearest asylum legal aid providers being in Essex and Bedfordshire and unlikely to be able to meet high demand. The planning documents make no reference to facilities onsite where confidential legal appointments could take place.

Conclusion

It is hard to imagine a 'home environment' less suitable for a person fleeing persecution and conflict, perhaps with a substantial personal trauma history, than a segregated, remote institutional site, without an assigned support worker on site, situated next to a prison for sex offenders and a rural village community, with a single store within walking distance and very limited other amenities a three mile walk along unlit roads without a pavement and without regular public transport (which the residents could not necessarily afford anyway).

In HBF's experience there can be a lot of assurances given about the opening of emergency accommodation centres and the 'quality' of the resources on site that are not borne out by reality and do not adequately address the needs of people seeking asylum. HBF would encourage this planning decision to take into account the rigorous and extremely critical findings made by the High Court, relevant inspectorates and a specialist Parliamentary APPG (as above). The planning application for Jaguar Buildings to be reopened has been made without commensurate safeguards, auditable standards and improvements being put in place. We would support the point made by Jerome Mayhew MP in his planning letter dated 25 January 2022 that the reasons why the site was closed "are still present".

We hope that this information is useful and please do let us know if we can assist further.

Yours faithfully,

The Helen Bamber Foundation