

Nettlefire – Site MOD015



Habitats Regulations Assessment Screening

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Home Office

2 July 2026

DOCUMENT CONTROL

Document:	Habitats Regulations Assessment Screening
Project:	Nettlefire – Site MOD015
Client:	Home Office



Version	1	Prepared by:	
Date:	10 April 2026	Checked by:	
Status:	Final	Approved By:	
Description	First Issue		
Version	2	Prepared by:	
Date:	2 July 2026		
Status:	Final		
Description	Update after PEA completion and client comments		

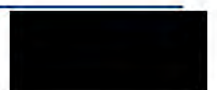


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APPENDIX A: REPORT CONDITIONS



EXECUTIVE SUMMARY

Contents	Summary
Site Location	The Proposed Development site is located at Bicester Garrison (Figure 1) which is currently used as a military storage facility. The Proposed Development site is centred at National Grid Reference SP 63089 17848.
Proposals	The proposal consists of upgrading the Proposed Development Site to allow it to be used for use as asylum accommodation for c800 SUs, with a further 450 bedspaces for capacity, totalling 1,256.
Scope of this Report	The purpose of this report is to assess the impact pathways, in the absence of mitigation, to likely significant effect of the Proposed Development upon the qualifying features of relevant Habitats sites (Habitats Regulations Assessment Screening (Stage 1 Assessment)), and subsequently assess whether these would result in an adverse effect on the integrity of these Habitats sites - thus proceeding to Appropriate Assessment (Stage 2 Assessment).
Stage 1: Screening Results	Following the screening assessment of potential impact pathways, it can be concluded that there are no Habitats sites that may be affected by the Proposed Development. Therefore, there is no likely significant effect either alone, or in combination with other plans and projects.
Conclusion	The Proposed Development will not impede the achievement of the conservation objectives of any Habitats sites which are being, or will be, delivered under Article 6(1) or 6(2) of the Habitats Directive.

1.0 INTRODUCTION

1.1 BACKGROUND

██████████ was commissioned by the Home Office on 26th February 2026 to prepare a Report to Inform an Appropriate Assessment for the Proposed Development at Site 15, hereafter referred to as “the Proposed Development site” and displayed in Figure 1.

This report is required to establish the potential for the Proposed Development to affect the qualifying features of any Habitats sites either alone or in combination with other plans or projects. The competent authority and is required to assess the Proposed Development under Regulation 63 of The Conservation of Habitats and Species Regulations 2017, hereafter referred to as the Habitats Regulations. This report is prepared to assist the competent authority in undertaking their duties.

This report has been prepared by ██████████. It has been reviewed by ██████████ and verified by ██████████. The conditions pertinent to it are provided in Appendix A.

1.2 PROPOSED DEVELOPMENT SITE DESCRIPTION

The Proposed Development site is located at Bicester Garrison approximately 4.8km south-east of Bicester (**Figure 1**). The Proposed Development site is centred at National Grid Reference SP 63089 17848. The Proposed Development site is currently a large-scale military storage facility with Nissen huts and warehouses. The surrounding habitats are primarily woodland and arable areas.

1.3 DEVELOPMENT PROPOSALS

The Home Office Asylum Accommodation Programme (AAP) is progressing a priority initiative established to rapidly mobilise and de-risk a pipeline of complex sites through early-stage feasibility, assurance and technical readiness activity. Initial investigation identified multiple Government-owned land sites potentially suitable to operationalise as asylum accommodation, using modern methods of construction/modular accommodation to house asylum seekers. Some sites have existing buildings with the potential to remediate for use as accommodation and others are more suitable for demolition and full use of modular accommodation. Following initial feasibility assessments, the Proposed Development site was deemed as having potential for this use. The Proposed Development has been non-operational for a number of years and is currently vacant. Extensive surveys are ongoing: to support planning applications; determine the level of enabling works required; and to inform the detailed design of the modular solution.

It is expected utilities, site services, foul and surface water drainage systems etc will need to be replaced and/or capacity increased for use as asylum accommodation for c800 SUs, with a further 450 bedspaces for capacity, totalling 1,256.

1.4 REQUIREMENT FOR HRA

The requirement for a Habitats Regulations Assessment (HRA) is established through Council Directive 92/43/EEC on the Conservation of Natural Habitats and of Wild Fauna and Flora, hereby referred to as the 'Habitats Directive', in Articles 6(3) and 6(4). The Habitats Directive is transposed into national legislation by the Habitats Regulations.

A HRA is an assessment of the potential impacts of a proposed project or plan on the conservation objectives of any Habitats site and, where necessary, an assessment of the efficacy and suitability of any mitigation and / or avoidance measures intended to preclude negative effects.

A European site is defined within the Habitats Regulations Regulation 8(1)¹ as:

- (a) a special area of conservation;*
- (b) a site of Community importance which has been placed on the list referred to in the third subparagraph of Article 4(2) of the Habitats Directive (list of sites of Community importance);*
- (d) an area classified pursuant to Article 4(1) or (2) of the old Wild Birds Directive or the new Wild Birds Directive (classification of special protection areas); or*
- (e) a site which has been proposed to the European Commission under regulation 12, until such time as—*
 - (i) the site is designated as a special area of conservation under regulation 12 or under a corresponding provision in the other retained transposing regulations; or*
 - (ii) the appropriate authority gives the appropriate nature conservation body notice of its intention not to designate the site, setting out the reasons for its decision, in accordance with regulation 141A(3)*

Under the changes brought in through the Planning and Infrastructure Act 2025, Ramsar sites are to be assessed through Regulation 63 (1A) of the Habitats Regulations.

Additional areas are afforded protection as if they were European Sites. Paragraph 194 of the National Planning Policy Framework (NPPF) (MHCLG, 2024) states that:

‘The following should be given the same protection as habitats sites:

¹ Regulation 8(1)(c) is omitted as per textual amendments in the Habitats Regulations

- a) *potential Special Protection Areas and possible Special Areas of Conservation;*
- b) *listed or proposed Ramsar sites; and*
- c) *sites identified, or required, as compensatory measures for adverse effects on habitats sites, potential Special Protection Areas, possible Special Areas of Conservation, and listed or proposed Ramsar sites.'*

In line with the NPPF, but to help differentiate when describing habitats; European sites and those afforded protection under paragraph 194 of the NPPF are referred to as 'Habitats sites' within this report.

The impacts assessed within a HRA must include the direct, indirect and in-combination impacts of approving the plan or project, considered with any current or proposed activities, developments or policies impacting on the Habitat site. The potential impacts of projects and policies outside the Habitats sites, but potentially impacting upon them (i.e., negative effects upon functional habitat used by their qualifying features) must also be included in the assessment.

A HRA can only be performed by a Competent Authority, as per Regulation 63(1). This RIAA is prepared in accordance with Regulation 63(2) and provides '*such information as the competent authority may reasonably require for the purposes of the assessment or to enable it to determine whether an appropriate assessment is required.*'

1.5 HABITATS REGULATIONS GUIDANCE

The HRA process undertaken by [REDACTED] has been developed to align with the long-established guidance set out in the HRA Handbook (DTA Publications, 2025). It is noted that as of January 2026, the HRA Handbook has been withdrawn. However, at the time of writing there is no further legislative or policy change that would alter the approach taken as part of this assessment. The DTA HRA Handbook remains the most appropriate guide to support the HRA process in the United Kingdom.

HRA judgement (Holohan and Others v An Bord Pleanála, 2018) has been considered within this assessment. In summary this judgement provides further clarification about the scope of an Appropriate Assessment (AA), requiring that the assessment must:

- Catalogue the entirety of habitat types and species for which a Habitats site is protected.
- Identify and examine the implications of the plan or project for species present on the Special Protection Areas (SPAs) / Special Areas of Conservation (SACs) / Ramsar sites for which the site(s) in question has not been listed provided that those implications are liable to affect the conservation objectives of the site (i.e. if they are necessary to the conservation of the habitat types and species listed for the protected area(s)).

- Consider the implications for habitat types and species found outside the SPA / SAC / Ramsar sites provided that those implications are liable to affect the conservation objectives of the SPA / SAC / Ramsar site(s) in question (i.e. if they are necessary to the conservation of the habitat types and species listed for the protected area(s)).

In essence this is how a thorough HRA is carried out, as there may be other features supporting the Conservation Objectives of the Habitats site which are not actually listed as qualifying features, both within the boundary of the Habitats site and outside it.

1.6 INFORMATION USED IN THIS ASSESSMENT

- Initial Scoping Inspection Report (Home Office, 2026)
- Feasibility Study [REDACTED], 2025)
- Initial Feasibility (HM Government, 2025)

1.7 LIMITATIONS

This RIAA only considers the details of the Proposed Development that are described within the Site Feasibility Study prepared by [REDACTED] 2025) and the Scoping Report from the Home Office (Home Office, 2026). Should any planning application receive a positive determination, and the consented elements differ to those within the Site Feasibility Study and Scoping Report, the competent authority may request further information under Regulation 63(2) of the Habitats Regulations in the form of an updated RIAA.

2.0 ASSESSMENT METHODOLOGY

Under the Habitats Regulations, an AA needs to be carried out in respect of any plan or project which:

- (i) either alone or in-combination with other plans or projects would be likely to have a significant effect on a Habitats site; and
- (ii) is not directly connected with or necessary for the management of the Habitats site for nature conservation.

This report is concerned with Stage 1 (Screening for Likely Significant Effects (LSE)) Screening. Table 1 provides a summary of each stage of the process.

Table 1. HRA Stages

Stage	Details
Stage 1 - Screening for LSE	This is often called an assessment of LSE which is essentially a risk assessment, typically utilising existing data, records and specialist knowledge. The purpose of the test is to decide whether 'full' AA is required. The essential question is: <i>"Is the project, either alone or in-combination with other relevant projects and plans, likely to result in a significant effect upon Habitats sites?"</i> A LSE is any effect which would undermine the conservation objectives of the Habitats sites. As a result of European case law, in Waddenzee², irrespective of the normal English meaning of 'likely', in this statutory context 'a likely significant effect' is 'a possible significant effect.' If it can be demonstrated that significant effects will not occur, in the absence of mitigation, no further assessment is required. If this cannot be demonstrated, the assessment proceeds to Stage 2.
Stage 2 - AA	Where it cannot be satisfactorily demonstrated that significant effects are unlikely, an AA is required. This stage is focussed entirely upon the qualifying features of the Habitats sites in question. The essential question here is: <i>"Will the project, either alone or in-combination with other relevant projects and plans, actually result in an adverse effect upon the integrity of any Habitats sites?"</i>

² <https://eur-lex.europa.eu/legal-content/EN-FR-DE/TXT/?from=EN&uri=CELEX%3A62011CJ0258> the English-language version of the ruling may be read to mean that there is a need to establish a degree of probability of an effect. The translations of other languages are weaker and suggest that the test of significance is at a lower level. The test should therefore be understood as whether the plan or project concerned is capable of having an effect. It is in that sense that the English 'likely to' should be understood.

	If it is concluded that adverse effects will occur, mitigation measures will be required to either avoid the impact in the first place, or to reduce the impact to such an extent that it is no longer adverse. Note that, unlike standard Ecological Impact Assessment, compensation for adverse effects (i.e. creation of alternative habitat) is not permitted to be considered at the AA stage.
Stage 3 - Derogations	Where an adverse effect cannot be avoided or reduced consent may only be granted as a derogation. This involves three legal tests that must be passed sequentially. The first test involves the examination of alternative ways of achieving the objectives and avoiding adverse impacts on the integrity of the Habitats sites. The second test is to demonstrate the proposals must proceed for imperative reasons of overriding public interest (IROPI). The third test is securing compensatory measures

3.0 SCOPE OF ASSESSMENT

3.1 IDENTIFICATION OF HABITATS SITES WITH POTENTIAL TO BE AFFECTED BY THE PROPOSED DEVELOPMENT

Projects may have spatial implications beyond the development footprint. Specifically, it is recognised that the distance between a plan / project and a Habitats site is not a definitive determinant as to the likelihood of an impact occurring or its severity. Site variables such as prevailing wind conditions, and surface and groundwater flow direction will all have an influence on the relative distance at which an impact can occur.

Additionally, the mobile nature of qualifying interest species must also be considered, since an adverse effect on the qualifying species of a Habitats site, even if these are present outside the Habitats site for which they are qualifying, may still result in a significant adverse effect on a Habitats site. Hence, a plan or project some distance away from a Habitats site could still have effects on the site and this, therefore, needs to be considered as part of the screening process.

This also means that both species and habitats which are present within the Habitat site's boundary or outside of the Habitats site should be considered even if they are not qualifying features, if they are supporting features that might affect the conservation objectives of the Habitats site if lost or damaged. This report has considered qualifying features as well as other habitats, flora and fauna that might be important in achieving the conservation objectives of the Habitats sites in question and maintaining site integrity.

3.2 DETERMINING THE ZONE OF INFLUENCE

The zone of influence (Zoi) used within this report was determined using a standard source-pathway-receptor model. In order for an effect to be established all three elements of this mechanism must be in place. The absence or removal of one of the elements of the mechanism is sufficient to conclude that a potential effect is not of any relevance or significance.

Receptors are the qualifying features of a Habitats site or are the ecological or environmental features supporting the qualifying features of a Habitats site. A source is any identifiable element of the Proposed Development that is known to interact with the qualifying features, or the ecological or environmental processes. The pathways are any connections or links between the source and the receptor.

A 15km Zol search radius from the Proposed Development site was used to identify any Habitats sites that could be adversely affected **Figure 2**. This is considered to be sufficient to capture all Habitat sites which may be impacted by the Proposed Development.

The Zol was extended to 20km for SACs designated for bats and a review was undertaken for the wider area to identify any designated sites with greater Zol for recreational pressures.

No Habitat sites were recorded within 15km of the Proposed Development, no SACs designated for bats within 20km and no Habitat sites with hydrological connectivity were identified. The Proposed Development site is not within any recreational disturbance Zol.

4.0 STAGE 1: SCREENING ASSESSMENT

There are no Habitats sites within 15km of the Proposed Development site. The nearest Habitats site is Oxford Meadows SAC, which is approximately 15.8km West of the Proposed Development site. Notwithstanding the limitations described in Section 1.7, the Proposed Development is not considered to form functionally linked land capable of supporting qualifying features of any Habitats sites.

A review of Defra's online 'MAGIC'³ mapping suggests there are no surface watercourses that hydrologically connect the Proposed Development site and any Habitats sites. As such, there is no hydrological pathway between the Proposed Development site and any Habitats site.

The review of MAGIC also indicates that the Proposed Development is not located atop a bedrock aquifer. There is superficial Secondary A aquifer under the Proposed Development site. Whilst there is a possibility ground water could be encountered when excavating for foundations, any pollutant that could come into contact will be managed through standard best practice measures. It is highly likely that any pollutant that may enter groundwater would be minimal in quantity due to the nature and scale of the Proposed Development. Furthermore, the receiving aquifers would likely dilute any pollutant to a level that would be indistinguishable by the time it reaches any Habitats site.

The Proposed Development site is not within any Sensitive Catchment Areas and is outside any Recreational Disturbance Zol meaning there is no effect during the operation phase.

Based upon the project details described in the Site Feasibility Study (Pick Everard, 2025) and Scoping Report (HM Government, 2025), the Proposed Development will not have a LSE upon any Habitats sites during construction and operation.

³ <https://magic.defra.gov.uk/MagicMap.html>

5.0 CONCLUSION

This is a record of the Stage 1 LSE Screening required by Regulation 63 of the Habitats Regulations and undertaken by [REDACTED] in respect of the Proposed Development. The Stage 1 LSE assessment concluded that the Proposed Development will not have a LSE on any Habitats sites. The Proposed Development will not impede the achievement of the conservation objectives of any Habitats sites which are being, or will be, delivered under Article 6(1) or 6(2) of the Habitats Directive.

6.0 REFERENCES

DTA Publications, 2025. *Habitats Regulations Handbook*, s.l.: DTA Publications.

HM Government, 2025. *Initial Feasibility – MOD015 – MoD – Bicester (A Site)*, s.l.: s.n.

Holohan and Others v An Bord Pleanála, 2018. [Online]

Available at: <https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX%3A62017CJ0461>

Home Office, 2026. *QHSE Compliance Team Initial Scoping Inspection Report MOD015 Bicester Garrison (A-Site)*, s.l.: s.n.

MHCLG, 2024. *National Planning Policy Framework*. [Online]

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https://assets.publishing.service.gov.uk/media/67aafe8f3b41f783cca46251/NPPF_December_2024.pdf

[Accessed 24 April 2025].

██████████, 2025. *Feasibility Study*, s.l.: s.n.

FIGURES





Site Location Plan

MOD015

Home Office

Legend

 Site boundary



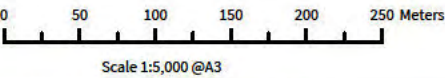
Notes:



Figure No. 1

Revision No. B

30 June 2026



British National Grid

NGR: 463022E 217804N

Microsoft, Vantor, © OpenStreetMap (and) contributors, CC-BY-SA





International Sites Within 15 km

MOD015



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Legend

-  Site boundary
-  Special Areas of Conservation (SAC)
-  Site boundary buffer (15 km)

Data Sources:
[Special Areas of Conservation](#)

Notes:
Symbology similar to that used within the MAGIC Application

Drawn by: CD

Checked by: JS

Figure No. 2

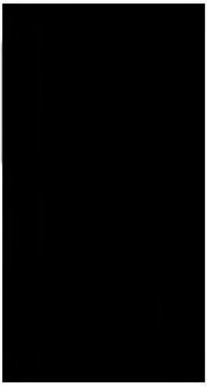
Revision No. A

27 March 2026

0 1 2 3 4 5 Kilometres
Scale 1:125,000 @A3

British National Grid
NGR: 463053E 217814N

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The report refers, within the limitations stated, to the environment of the Proposed Development in the context of the surrounding area at the time of the inspections'. Environmental conditions can vary and no warranty is given as to the possibility of changes in the environment of the Proposed Development and surrounding area at differing times. No investigative method can eliminate the possibility of obtaining partially imprecise, incomplete or not fully representative information. Any monitoring or survey work undertaken as part of the commission will have been subject to limitations, including for example timescale, seasonal and weather-related conditions. Actual environmental conditions are typically more complex and variable than the investigative, predictive and modelling approaches indicate in practice, and the output of such approaches cannot be relied upon as a comprehensive or accurate indicator of future conditions. The “shelf life” of the Report will be determined by a number of factors including; its original purpose, the Client’s instructions, passage of time, advances in technology and techniques, changes in legislation etc. and therefore may require future re-assessment.

The whole of the report must be read as other sections of the report may contain information which puts into context the findings in any executive summary.

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